

Analysis and Policy Review

Comparative Policy and Systematic Analysis of Social and Environmental Factors, Target Group Needs and Obstacles, and the Social Innovation Sector

*Building on D1.1.1 – Strategic Diagnostic Review and
Contextual Analysis*

Moldova, Germany, Croatia, Hungary, Bulgaria,
Serbia, Ukraine

Table of Contents

Executive Summary.....	2
1. Introduction.....	4
1.1 Scope and Positioning.....	4
1.2 Methodology.....	4
2. EU Horizontal Policy Framework.....	6
2.1 Gender Equality Architecture at EU Level.....	6
2.2 Critical Assessment: The Gender-Neutral Design Problem.....	7
2.3 The Danube Region Framework.....	8
3. National Policy Frameworks: Comparative Assessment.....	8
3.1 Assessment Matrix: 14 Policy Dimensions × 7 Countries.....	8
3.2 Country-Specific Policy Profiles: Critical Gaps and Enablers.....	10
Moldova (MDA) (Partner: AFAM).....	10
Germany (DEU) (Partner: TUM Int'l).....	10
Croatia (HRV) (Partner: TECHPARK).....	11
Bulgaria (BGR) (Partner: RAPIV).....	11
Hungary (HUN) (Partner: HETFA).....	12
Ukraine (UKR) (Partner: BRIT).....	13
Serbia (SRB) (Partner: ABW).....	13
4. Comparative Analysis of Social Factors.....	14
4.1 Care Infrastructure and the Gender Care Burden.....	14
4.2 Gender Pay Gap and Labour Market Segmentation.....	15
4.3 Digital Inclusion.....	16
4.4 Social Capital and Network Access.....	17
5. Environmental and Territorial Factors.....	18
5.1 Geographic Disparities and Territorial Cohesion.....	18
5.2 Green Economy Transition and Environmental Policy.....	19
5.3 Demographic and Migration Factors.....	19
6. Target Group Policy Mapping: Needs, Obstacles, and Policy Responses....	20
6.1 Mompreneurs (Women with Care Responsibilities).....	20
6.2 Young Women Under 35.....	21
6.3 Women Aged 50+ (Silver Age Entrepreneurs).....	22
6.4 Rural Women.....	23
6.5 Refugee and Displaced Women.....	24
6.6 Women Engaged in Social Entrepreneurship.....	25
7. Social Innovation Sector: Dedicated Analysis.....	26
7.1 Women's Centrality in the Social Innovation Ecosystem.....	26

7.2 Legal Framework Analysis: Five Distinct Positions.....	27
7.3 Financing Architecture for Social Innovation.....	28
7.4 Social Innovation and Environmental Sustainability: An Emerging Intersection.....	29
8. Integrated Policy Gap Assessment.....	29
8.1 Synthesis: Ten Documented Policy Failures.....	29
9. Policy Recommendations.....	32
10. Conclusions and Forward Link to D1.1.3.....	35
10.1 Synthesis of Principal Findings.....	35
10.2 Link to D1.1.3: Benchmarking Portfolio Priorities.....	35
Annexes.....	37
Annex 1: EU Policy Instruments Reference Table.....	37
Annex 2: Glossary of Key Policy Terms.....	38
Annex 3 — Primary Sources Referenced in D1.1.2.....	38

Executive Summary

This document constitutes Deliverable D1.1.2 – Analysis and Policy Review of the IMPACTA project, produced under Specific Objective 1 (SO1), Activity ACT 1.1 – Capitalisation on Existing Knowledge. It builds directly on D1.1.1 (Strategic Diagnostic Review and Contextual Analysis) by deepening the examination of the policy and regulatory environment across all seven Partner Countries (Moldova, Germany, Croatia, Bulgaria, Hungary, Ukraine, and Serbia) and the Danube Region (DR).

The central analytical objective of D1.1.2 is to move from diagnosis to evaluation: to assess not merely the existence of policy frameworks but their substantive effectiveness in addressing the structural needs and obstacles faced by the six priority target groups identified in D1.1.1 – mompreneurs, young women under 35, women aged 50+, rural women, refugee and displaced women, and women engaged in social entrepreneurship. A cross-cutting seventh dimension – women with low educational attainment or long-term unemployment – is treated throughout as an intersecting vulnerability rather than a standalone category.

The analysis is organised around five thematic pillars: (1) the EU horizontal policy framework and its national transposition; (2) social factors shaping women's entrepreneurship – care infrastructure, gender pay gaps, labour market segmentation, and digital inclusion; (3) environmental and territorial factors – geographic disparities, green economy transition, and climate-related vulnerability; (4) a systematic mapping and evaluation of target-group-specific policy provisions and their documented gaps; and (5) a dedicated analysis of the social innovation sector, including legal recognition, financing architecture, and ecosystem maturity across the partnership.

Key conclusions of this analysis are: no partner country has a fully integrated, gender-responsive policy pathway from entrepreneurial entry to growth and sustainability; childcare infrastructure remains the most universal unaddressed structural barrier; social enterprise frameworks are absent or dysfunctional in four of the seven partner countries; and the activation-to-growth discontinuity – first conceptualised in D1.1.1 – is confirmed as a design failure embedded in the architecture of EU operational programmes, not as a national idiosyncrasy. Seven strategic policy recommendations are formulated at the conclusion of this document, constituting the primary input for transnational policy advocacy and for the design of IMPACTA pilot activities.

1. Introduction

1.1 Scope and Positioning

D1.1.2 is the second of three knowledge capitalisation deliverables produced under Activity ACT 1.1. Its function within the ACT 1.1 sequence is specific: while D1.1.1 established the diagnostic baseline – mapping the structural conditions, target group profiles, ecosystem maturity, and cross-cutting patterns across all seven partner countries – D1.1.2 evaluates the policy and regulatory dimensions of this baseline in greater analytical depth. The transition from D1.1.1 to D1.1.2 is a transition from description to assessment: from 'what is the situation' to 'why does it persist, and where do policy systems succeed or fail in addressing it'.

D1.1.2 does not replicate the country-profile structure of D1.1.1. It adopts a thematic comparative architecture, analysing policy dimensions across the full partnership rather than country by country. Country-specific evidence is presented within thematic sections where it provides the best illustration of cross-cutting patterns. This approach enables the identification of systemic design failures that are not visible from any single national vantage point but emerge clearly from transnational comparison.

Relationship to ACT 1.1 Deliverables

D1.1.1 (Strategic Diagnostic Review): Establishes the baseline — structural conditions, target groups, ecosystem maturity, cross-cutting patterns. [Completed]

D1.1.2 (this document): Evaluates the policy and regulatory environment — social and environmental factors, target group obstacles, social innovation sector. [Current deliverable]

D1.1.3 (Benchmarking Analysis / Portfolio-Handbook): Documents transferable good practices. Draws on both D1.1.1 and D1.1.2. [Forthcoming]

1.2 Methodology

The methodology of D1.1.2 combines three analytical layers applied consistently across all seven partner countries and the Danube Region:

Layer	Approach
EU Framework Analysis	Systematic review of EU directives, regulations, and funding instruments applicable to women's entrepreneurship and social innovation. Assessment of transposition adequacy in each partner country.
National Policy Mapping	Structured mapping of national legislation, strategies, operational programmes, and institutional frameworks against a harmonised 14-dimension assessment matrix.

Layer	Approach
Comparative Gap Assessment	Cross-country identification of gaps between formal provisions and substantive outcomes, using the target group evidence base from D1.1.1 (50+ expert interviews, national statistical data, 2025-2026).

A key methodological principle, carried over from D1.1.1, governs the entire analysis: assessment focuses on systemic accessibility – how effectively policies reach women from disadvantaged backgrounds in practice – rather than on the formal existence of provisions. A policy that formally addresses a target group but is structurally inaccessible to it is assessed as ineffective for the purposes of this review.

2. EU Horizontal Policy Framework

2.1 Gender Equality Architecture at EU Level

The European Union has developed a multi-layered gender equality architecture that forms the reference framework for all seven IMPACTA partner countries, regardless of their EU membership status. EU Member States (Bulgaria, Croatia, Germany, Hungary) are subject to binding transposition obligations; EU candidate countries (Moldova, Serbia, Ukraine) are required to align progressively with this framework as part of the accession process.

The primary EU instruments relevant to D1.1.2 analysis are:

EU Instrument	Relevance to IMPACTA Target Groups	Transposition Status
EU Gender Equality Strategy 2020-2025	Framework for gender mainstreaming in economic policies; closing gender pay gap; work-life balance	Non-binding; implemented variably. DE and BG most advanced; HU weakest.
Work-Life Balance Directive (2019/1158)	Paternity leave, parental leave, carers' leave. Specific relevance for mompreneurs in self-employment.	Binding for EU-4. Self-employed women inadequately covered in DE, BG, HR implementation.
ESF+ Regulation (2021-2027)	Primary funding mechanism for skills, inclusion, and labour	Programming gaps for social enterprise; entrepreneurship

EU Instrument	Relevance to IMPACTA Target Groups	Transposition Status
	market activation. Covers all 7 PP via ESIF or IPA.	secondary outcome in activation OPs.
ERDF Regulation (2021-2027)	Competitiveness, innovation, and SME support. High administrative thresholds limit access for target groups.	Gender-neutral by design; no mandatory gender-disaggregated targets for SME programmes.
EU Pay Transparency Directive (2023/970)	Addresses gender pay gap; requires reporting and pay transparency for companies with 100+ employees.	Transposition deadline June 2026. DE: no action plan by March 2026 (Amnesty Int'l 2025). HU: GPG increasing since 2020.
EU Social Economy Action Plan (2021)	Recognises social enterprises as key vehicle for inclusive growth; supports legal frameworks.	Non-binding; UKR, BGR, SRB, MDA lack social enterprise legislation. Significant implementation gap.
EU Temporary Protection Directive (2001/55/EC)	Protection framework for displaced persons, including Ukrainians since March 2022.	HU implementation: categorical exclusion of TPD holders from self-employment — contradicts EU inclusion objectives.
IPA III (2021-2027)	EU pre-accession instrument for candidate countries; supports gender equality and SME development.	MDA, RS, UA access via IPA; gender-specific components are partial and project-based.

2.2 Critical Assessment: The Gender-Neutral Design Problem

The defining structural weakness of the EU policy architecture, as evidenced across all seven partner country assessments, is the systematic gender-neutrality of its primary economic instruments. The ESF+ and ERDF regulations do not require gender-specific

objectives, gender-disaggregated output targets, or care-compatible delivery mechanisms. The ERDF co-financing obligations and investment readiness thresholds are calibrated for established businesses, not for the micro-enterprises, social enterprises, and early-stage ventures that characterise women's entrepreneurship across the IMPACTA partnership.

EU Policy Finding 2.1: The two most financially significant EU instruments for SME support (ERDF and ESF+) are structurally gender-blind at programme design level. No mandatory gender-disaggregated targets exist for SME funding allocations, business creation outputs, or innovation investment outcomes. This is not a transposition failure – it is a design omission at EU level that systematically disadvantages women entrepreneurs across all partner countries, regardless of national intent.

2.3 The Danube Region Framework

The EU Strategy for the Danube Region (EUSDR) provides a transnational cooperation architecture spanning 14 countries, including all seven IMPACTA partner countries. The Danube Transnational Programme (DTP, EUR 202 million, 2021-2027) is the primary funding instrument. Priority Area 7 (Knowledge Society) and Priority Area 8 (Competitiveness) are the most relevant for women's entrepreneurship and social innovation.

The DR framework adds significant value to the IMPACTA partnership by providing: (a) a legitimising transnational mandate that supports cross-border knowledge transfer; (b) funding access for joint initiatives that individual countries cannot finance alone; and (c) a political platform for advocacy on regulatory reforms (particularly social enterprise legislation) that require EU-level attention. The absence of gender-specific sub-priorities within the EUSDR is a notable gap that IMPACTA partners are positioned to address through evidence-based advocacy.

3. National Policy Frameworks: Comparative Assessment

3.1 Assessment Matrix: 14 Policy Dimensions × 7 Countries

Table 3.1 provides a systematic comparative assessment of 14 policy dimensions across all seven partner countries. The assessment applies a three-level scale reflecting substantive effectiveness for target groups, not formal existence of provisions.

Policy Dimension	MDA	BGR	HRV	DEU	HUN	UKR	SRB	Notes
Constitutional & legal equality guarantee	✓	✓	✓	✓	✓	✓	✓	<i>Universal — formal foundation in all 7 countries</i>
Anti-discrimination law (gender, age, ethnicity)	✓	✓	✓	✓	✓	✓	✓	<i>Present in all; BG broadest grounds (2003 Act)</i>
Dedicated gender equality strategy (current)	✓	✓	✓	✓	🟡	✓	✓	<i>HU: no integrated strategy; fragmented policy mix</i>
Gender strategy with binding implementation	🟡	🟡	🟡	🟡	✗	🟡	🟡	<i>No country achieves binding mechanism; HU critical gap</i>
Dedicated women's entrepreneurship programme	🟡	✗	🟡	🟡	🟡	✓	🟡	<i>DE: EXIST Women, KfW; UA: eRobota/Vlasna Sprava</i>
OP explicitly targeting women entrepreneurs	🟡	✓	✓	✓	🟡	🟡	🟡	<i>BG HRDP most explicit; HR and DE have dedicated measures</i>
Parental/maternity rights for self-employed women	🟡	🟡	🟡	🟡	🟡	🟡	🟡	<i>Universal gap: self-employed women systematically disadvantaged vs. employees</i>
Rural/territorial entrepreneurship instrument	🟡	✓	✓	🟡	🟡	✓	🟡	<i>BG Sub-measures 6.2/6.4; HR LEADER; UA FemAgro most targeted</i>
Legal framework for social enterprises	🟡	🟡	🟡	🟡	🟡	✗	🟡	<i>DE strongest; UA no law since 2004; BG/SRB fragmented</i>
Gender Pay Transparency enforcement mechanism	🟡	🟡	🟡	🟡	🟡	🟡	🟡	<i>EU Directive transposition pending/incomplete in all EU-4</i>

Policy Dimension	MDA	BGR	HRV	DEU	HUN	UKR	SRB	Notes
Childcare integration in entrepreneurship OP	✗	✗	✗	✗	✗	⦿	✗	<i>Universal critical gap; UA Municipal Nanny insufficient</i>
Refugee women's entrepreneurship provision	⦿	⦿	⦿	⦿	✗	✓	⦿	<i>HU: categorical legal exclusion. UA: IDP-first ecosystem</i>
Gender-disaggregated MSME data in national system	⦿	✗	⦿	⦿	✗	⦿	✗	<i>DE Destatis best; SRB and UA: officially acknowledged gaps</i>
Innovation/smart spec. strategy with gender lens	✗	✗	✗	✗	✗	✗	✗	<i>Universal gap: no partner country has gender objectives in innovation strategy</i>

Assessment scale: ✓ = Effective / adequate provisions with demonstrated reach for target groups /
 ⦿ = Partial / implementation gap / indirect provisions only / ✗ = Absent or critically inadequate

3.2 Country-Specific Policy Profiles: Critical Gaps and Enablers

Moldova (MDA) (Partner: AFAM)

Key policy enablers:

- EU candidate process accelerating regulatory reform aligned with *acquis communautaire*
- Active civil society sector (ODA, AFAM) partially compensating institutional gaps
- ILO, UN Women, and UNDP programmes providing alternative financing and capacity-building infrastructure
- National Action Plan on Gender Equality 2023-2025 covers entrepreneurship as a policy objective

Critical policy gaps:

- No dedicated financial instrument for women-led businesses at national budget level; full donor dependency
- Administrative barriers to business formalisation disproportionately affecting rural women and refugees
- Absence of official data on women-led social enterprises prevents evidence-based policy design

- Childcare infrastructure critically underdeveloped: 15% formal coverage ages 0-3 (national statistics 2023)
- No social enterprise law; civil society structures operate without formal recognition or tax benefits

Germany (DEU) (Partner: TUM Int'l)

Key policy enablers:

- EXIST Women programme (BMWi) supporting tech-focused women founders with grants and mentoring
- KfW Start-up Loan for Women: dedicated financial instrument with favourable conditions
- Federal Women in Business Strategy (BMWi) providing cross-ministerial coordination framework
- Dense university-industry interface enabling structured ecosystem navigation for educated women
- German Social Entrepreneurship Monitor (DSEM) providing ecosystem mapping and visibility

Critical policy gaps:

- EU Pay Transparency Directive transposition: no government action plan as of March 2026 (Amnesty International 2025)
- Childcare deficit of approximately 383,600 places (Destatis/Bertelsmann 2022) — highest absolute gap in partnership
- Support ecosystem fragmented: 5/6 expert interviewees (TUM 2026) identified this as the primary systemic problem
- VC gender gap: women receive only 6% of deals, 2% of total investment volume (Female Founders Monitor 2024)
- Programmes cluster around highly educated urban women; significant gap for migrant, Black, and community-oriented women

Croatia (HRV) (Partner: TECHPARK)

Key policy enablers:

- Bulgaria-comparable ESIF architecture providing formal access to EU Structural Funds for women entrepreneurs
- Technology parks (TECHPARK Rijeka) and regional development agencies supporting early-stage entrepreneurship
- LEADER programme and rural development instruments accessible to rural women and mompreneurs
- EU membership since 2013 provides regulatory alignment and access to EU-funded technical assistance

Critical policy gaps:

- Activation-to-growth discontinuity: ESF-funded activation support does not connect to ERDF competitiveness instruments
- No dedicated national women's entrepreneurship programme beyond horizontal EU instruments
- Social enterprise framework partial; no unified legal definition or dedicated financing mechanism
- Gender-disaggregated data on women's business performance: multiple fields marked N/A in national system
- Interview data gap: number of expert interviews not specified in submitted needs assessment (TECHPARK 2026)

Bulgaria (BGR) (Partner: RAPIV)

Key policy enablers:

- HRDP 2021-2027 most explicitly target-group-responsive OP in the EU partner country cluster
- Sub-measures 6.2/6.4 of Programme for Rural Development providing CLLD-based accessible support for rural women
- Broad anti-discrimination framework (2003 Act) covering gender, ethnicity, age, family status, and refugee status
- National Strategy for Equality between Women and Men 2021-2030 covering economic empowerment objectives

Critical policy gaps:

- OP Competitiveness and Innovations in SMEs: co-financing obligations and investment readiness requirements exclude early-stage micro-enterprises
- lacks a clear, supportive and comprehensive legal and policy framework; social enterprises operate under multiple legal forms, which limits visibility, access to finance, and eligibility for support measures.
- Formal childcare coverage: 21.2% ages 0-3 (Eurostat 2024) — below EU average, with significant rural-urban gap
- Gender-disaggregated data: sectoral distribution of women-led businesses listed N/A in national statistical system
- LAG capacity and quality varies significantly by region, creating unequal access to rural programme support

Hungary (HUN) (Partner: HETFA)

Key policy enablers:

- GINOP (Economic Development and Innovation OP): largest EU-funded programme with some SME gender-sensitive components
- GEM Hungary Special Report 2024 providing granular gender-disaggregated entrepreneurship data for advocacy
- Emerging Budapest startup ecosystem creating structured entrepreneurial support infrastructure
- NGO sector active in supporting women entrepreneurs on a general level and refugee integration, providing partial compensatory support for Ukrainian women

Critical policy gaps:

- **CRITICAL:** Persons under temporary protection CANNOT become sole proprietors or establish companies under Hungarian law (OIF 2026) — categorical legal exclusion of Ukrainian refugee women from entrepreneurship
- No integrated national gender equality strategy; gender treated as marginal dimension in economic planning (HETF/RE-FEM 2023)
- Gender pay gap increasing since 2020 (Amnesty International 2025); EU Pay Transparency Directive: no implementation action plan
- Women's TEA rate 4.9% vs. 9.2% men (GEM 2024) — among largest gender gaps in the EU partnership
- Largest gender gap in digital tool adoption planning among European countries: 30.0% women vs. 49.4% men (GEM 2024)

Ukraine (UKR) (Partner: BRIT)

Key policy enablers:

- eRobota / Vlasna Sprava micro-grant programme: 61% women beneficiaries in 2024 (Ministry of Economy 2024)
- Diia.Business digital platform maintaining entrepreneurship support throughout armed conflict
- 'Create!' grant programme (Ministry of Economy / KSE Foundation): up to USD 15,000 for women in manufacturing
- Vidvazhna accelerator (USAID/Visa): 5,000+ participants (2023-2024); documented regional benchmark
- State Strategy for Equal Rights and Opportunities 2022-2030: intersectionality principle explicitly incorporated

Critical policy gaps:

- No social enterprise law since 2004; repeated legislative attempts blocked — prevents access to tax relief and formal recognition (BRIT 2026)
- 5-7-9% preferential lending programme: 3-year operating history requirement categorically excludes early-stage businesses (BRIT 2026)

- Wartime childcare collapse: formal coverage 15.77% ages 0-3 (UNICEF 2023); Municipal Nanny (7-8K UAH) insufficient
- Women's unpaid care hours: 56 hours/week during wartime vs. 49 pre-war — structural participation barrier
- Absence of sick-leave rights for self-employed women when a child is ill (right enjoyed by employees — BRIT 2026)

Serbia (SRB) (Partner: ABW)

Key policy enablers:

- Gender Equality Strategy 2021-2030 explicitly prioritises economic empowerment and entrepreneurship for women
- Growing EU accession alignment creating incentive structure for gender-responsive policy reform
- Science Technology Park Belgrade and emerging innovation ecosystem providing partial infrastructure
- ABW (Association for Business Women) active in mentoring, advocacy, and capacity-building for women entrepreneurs

Critical policy gaps:

- Social enterprise framework: not codified; women-led social organisations operate without formal recognition or dedicated financing
- Gender-disaggregated MSME data: officially acknowledged gap in Gender Equality Strategy 2021-2030 (ABW 2026)
- Female labour force participation: 54.3% (25-64) — among lowest in the partnership; education-employment gap unresolved
- IPA programme absorption by women-led SMEs: not systematically tracked — evidence-based policy design impossible
- Interview data gap: number of expert interviews conducted not specified in submitted needs assessment (ABW 2026)

4. Comparative Analysis of Social Factors

This section analyses the four principal social factors shaping women's entrepreneurship across the IMPACTA partnership: care infrastructure and gender-based care burden; labour market segmentation and the gender pay gap; digital inclusion; and social capital and network access. Each factor is assessed comparatively across all seven partner countries, drawing on the statistical baseline established in D1.1.1 and deepened with policy analysis.

4.1 Care Infrastructure and the Gender Care Burden

Care responsibilities – for children, elderly dependants, and family members with disabilities – constitute the most universally documented structural barrier to women's entrepreneurship across the IMPACTA partnership. D1.1.1 established that the absence of affordable, reliable childcare is the single factor mentioned by all expert interviewees in all seven partner countries. D1.1.2 analyses the policy architecture through which this barrier is – or is not – addressed.

Country	Formal childcare coverage 0-3	Parental leave female uptake	Women part-time employment	Policy response adequacy
Moldova	~15% (nat. stats 2023)	73.3% (high)	N/A	Pilot model (ILO/AFAM): innovative but not scaled
Germany	35.5% / deficit 383,600 (Destatis 2022)	43.9% (Destatis 2023)	48.1% (Bertelsmann 2022)	Formal provision exists; not integrated in OP design
Croatia	N/A (rural gap severe)	N/A	N/A	LEADER partially addresses; no OP integration
Bulgaria	21.2% (Eurostat 2024)	N/A	N/A	HRDP addresses timing; childcare not in OP design
Hungary	~35% (Eurostat est.)	N/A	N/A	Public employment focus; care not in entrep. design
Ukraine	15.77% (UNICEF 2023)	97% women / 3% men (UNFPA 2020)	N/A	Municipal Nanny (7-8K UAH): insufficient; wartime collapse
Serbia	~28% (Eurostat est.)	N/A	N/A	Strategy commitment; no dedicated instrument

The policy assessment reveals three distinct tiers of response. Germany has the most developed formal provision (35.5% coverage) but the largest absolute infrastructure gap (383,600 missing places) and no integration of childcare support into

entrepreneurship programme design. Bulgaria and Hungary have partial EU-funded provisions (HRDP, ESF+) that address programme scheduling but not structural access. Moldova, Ukraine, Croatia, and Serbia have the weakest formal coverage and no entrepreneurship-integrated response.

Social Factor Finding 4.1: No partner country integrates childcare support – through subsidies, on-site provision, care-compatible scheduling, or care vouchers – into the design of women's entrepreneurship support programmes. This is not a resource constraint: the Moldova ILO/AFAM Childcare Entrepreneurship Pilot demonstrates that the care infrastructure deficit can be partially addressed through an entrepreneurship-based market creation approach at low marginal cost. The barrier is a design convention, not an operational impossibility.

4.2 Gender Pay Gap and Labour Market Segmentation

The gender pay gap functions as a compounding structural barrier to entrepreneurship: lower lifetime earnings reduce accumulated savings, creditworthiness, and personal investment capital available at business entry. Table 4.2 maps the documented GPG across the partnership and its policy response adequacy.

Country	GPG (most recent)	Trend	EU Pay Transparency Dir.	Sectoral segregation
Moldova	~13-15% (ILO)	Stable	Not applicable (candidate)	Education, retail, social services dominant
Germany	16% hourly (Destatis 2025)	Persistent	No action plan (Amnesty 2025)	Healthcare, recruitment, e-commerce; VC gap 94%
Croatia	~11% (Eurostat 2023)	Declining slowly	Transposition incomplete	Services, tourism, consultancy; low in manufacturing
Bulgaria	13.1% (NSI 2023)	Stable	Transposition incomplete	Services, trade; social innovation emerging
Hungary	~17% (OECD/EIGE est.)	Increasing since 2020	No action plan (Amnesty 2025)	Care/education/services ; manufacturing secondary
Ukraine	18% (WEF GGGR 2025)	Wartime disruption	Not applicable (candidate)	IDP-driven shift; rising female share in tech

Country	GPG (most recent)	Trend	EU Pay Transparency Dir.	Sectoral segregation
Serbia	~8-10% (stat. estimates)	Stable, but data gaps	Not applicable (candidate)	Services; significant education-to-employment gap

The most significant policy failure identified in this dimension is the absence of EU Pay Transparency Directive implementation action plans in Germany and Hungary – the two EU member states with the most entrenched and worsening pay gaps. For EU candidate countries, the GPG functions as a structural disincentive to entrepreneurship that the accession process has not yet adequately addressed through binding alignment requirements.

4.3 Digital Inclusion

Digital inclusion – defined as the combination of access to digital infrastructure, digital competence, and integration of digital tools in business operations – is both an enabler and a barrier for women entrepreneurs across the IMPACTA partnership. The analysis identifies three distinct digital divide dimensions that policy frameworks address inadequately.

- The age-digital divide: Women aged 50+ face significantly lower digital competence than younger cohorts in all seven countries. In Bulgaria, experts identify digital marketing and online presence as systematic gaps (RAPIV 2026). In Hungary, established women's businesses record only 6.9% adoption of new digital technology (GEM 2024), with older women disproportionately excluded.
- The gender-digital divide within entrepreneurship: Hungary shows the largest gender gap in digital tool adoption planning in Europe: 30.0% of women entrepreneurs vs. 49.4% of men planned digital tool adoption (GEM 2024). Germany documents a 'threshold issue' – women's hesitation to engage with technology until fully qualified, linked to STEM socialisation patterns (TUM 2026).
- The rural-digital divide: Rural women across the partnership face compounded disadvantages from both inadequate broadband infrastructure and lack of digital skills. Ukraine's Diia.Business platform represents the most sophisticated public digital response, but its urban concentration limits rural reach (BRIT 2026). Bulgaria's LAG/CLLD programmes rarely include systematic digital upskilling components (RAPIV 2026).

Social Factor Finding 4.3: Digital inclusion policy across the IMPACTA partnership treats digital skills as a technical deficit to be addressed through training courses rather than as

a structural capability requiring ecosystem-level integration with mentoring, peer learning, and practical application. Programmes providing digital training without concurrent access to digital tools, business platforms, and markets produce limited sustained outcomes for women from disadvantaged backgrounds.

4.4 Social Capital and Network Access

Social capital – defined as access to professional networks, mentoring relationships, peer communities, and institutional connections – is consistently identified in D1.1.1 expert interviews as a critical enabler of entrepreneurial sustainability. Its absence is a structural barrier that compounds other disadvantages, particularly for rural women, refugee and displaced women, and women aged 50+ who have experienced career interruptions.

Policy frameworks across all seven partner countries treat network access as a secondary programme element – a component of training programmes rather than a strategic investment in ecosystem infrastructure. The most effective documented exceptions are: the Diievi alumni community model in Ukraine (U&WE Hub / BRIT 2026), providing sustained peer support beyond formal programme completion; the Women's Entrepreneurship Centre concept identified in the Danube Region, providing a permanent institutional platform connecting academia, business, and women entrepreneurs; and the AWE Programme in Bulgaria (RAPIV 2026), which builds peer networks as a core programme output rather than a byproduct.

5. Environmental and Territorial Factors

5.1 Geographic Disparities and Territorial Cohesion

Geographic disparities between capital cities and peripheral or rural regions constitute a structural environmental factor shaping women's entrepreneurship in six of the seven IMPACTA partner countries (all except Germany, where the federal system distributes support more uniformly). The disparities manifest across three dimensions: infrastructure access (physical and digital); support ecosystem density (proximity to incubators, mentors, financial institutions); and market access (local demand, export connectivity).

Table 1.1 Geographic Disparities and Territorial Cohesion

Country	Rural-urban infrastructure gap	Support ecosystem concentration	Policy instrument addressing gap	Adequacy
Moldova	Severe: depopulation, limited rural services	Chisinau-concentrated	ODIMM district offices; ILO/AFAM rural pilots	Partial
Germany	Moderate: federal system distributes better	Larger cities; universities	ESF-co-financed local programmes (INA, Power M)	Moderate
Croatia	Severe: coastal/inland disparity; islands	Zagreb-concentrated	LEADER; RDP 2021-2027; regional agencies	Partial
Bulgaria	Severe: Sofia vs. peripheral regions	Sofia-concentrated	Sub-measures 6.2/6.4; LAG/CLLD	Partial (LAG quality varies)
Hungary	Severe: Budapest vs. NE/SE regions	Budapest-concentrated	GINOP; EFOP social inclusion	Weak
Ukraine	Extreme: conflict displacement; E-W divide	Western cities (IF, Lviv)	Wings of Hope Fund; FemAgro 2.0	Partial
Serbia	Severe: Belgrade vs. rural municipalities	Belgrade-concentrated	IPA-funded regional; ABW networks	Weak

The policy assessment reveals that rural development instruments (LEADER, CLLD, RDP sub-measures) are the most accessible territorial instruments for women from disadvantaged backgrounds, but systematically fail to include post-activation growth support, digital upskilling, or market-access components. They activate women into entrepreneurship but leave them without the infrastructure needed to sustain and grow their businesses beyond the initial grant period.

An important practical lesson emerging from the Hungarian interviews is that rural support needs to be locally embedded. In many rural contexts, the availability of programmes alone is not enough: effective outreach, trust-building, and sustained participation depend strongly on locally trusted actors, community-based intermediaries, and delivery formats that are rooted in the local context.

This suggests that rural support measures are more effective when they are not only territorially targeted in formal terms, but also implemented through credible local partnerships and place-based delivery mechanisms.

5.2 Green Economy Transition and Environmental Policy

The European Green Deal and associated regulatory frameworks (EU Taxonomy, Corporate Sustainability Reporting Directive, Green New Deal national programmes) create both opportunities and risks for women entrepreneurs across the IMPACTA partnership. Women-led enterprises are disproportionately concentrated in sectors most affected by green transition: agriculture and agro-processing, tourism, retail, and social services. The policy implications are asymmetric.

- Green economy opportunity: The transition to circular economy, sustainable food production, eco-tourism, and green social services creates new market niches where women-led social enterprises have demonstrated early positioning (Bulgaria: WE.Circular; Ukraine: eco-production sector growing; Moldova: agro-tourism developing). Policy frameworks do not systematically direct green economy support to women-led micro-enterprises.
- Green transition risk: Regulatory compliance burdens of the EU Green Deal (CSRD, EU Taxonomy) fall disproportionately on micro and small enterprises in traditional sectors where women are concentrated. No partner country has a gender-responsive green transition support instrument that specifically addresses the capacity constraints of women-led micro-enterprises in adapting to new environmental standards.
- Climate vulnerability and rural women: Rural women entrepreneurs in Moldova, Serbia, Bulgaria, and Croatia face compounded risks from climate change impacts on agriculture (drought, flooding) combined with limited access to climate adaptation financing. The EU Common Agricultural Policy (CAP) green architecture is not gender-sensitised at the level of implementation design.

Environmental Policy Finding 5.2: The green economy transition is currently designed at EU and national levels without gender-disaggregated impact assessments for micro-enterprises. Women-led businesses in sectors most exposed to green transition requirements (agriculture, tourism, retail) face compliance burdens without dedicated support. IMPACTA partners are positioned to document this gap through evidence-based advocacy in D1.1.3 and pilot activity design.

5.3 Demographic and Migration Factors

Demographic trends – population ageing, decline, and migration – constitute long-term environmental factors shaping the context for women's entrepreneurship. Three specific patterns require policy attention:

- Population ageing and the 'silver age' entrepreneurship opportunity: Serbia's largest female age cohort is 65-69; Bulgaria, Croatia, and Moldova face accelerating ageing. Women aged 50+ are both a growing potential entrepreneurial resource and an underserved group excluded by age from innovation-oriented programmes. No partner country has a dedicated entrepreneurship support instrument for this demographic – despite its documented growth potential (Babovic 2022; RAPIV 2026).
- Emigration and brain drain: Moldova, Serbia, Bulgaria, and Croatia face sustained emigration of working-age women, reducing the pool of potential entrepreneurs and skilled labour. Return migration – particularly from EU countries – represents an underutilised entrepreneurial asset: returnees bring European business exposure, networks, and skills. No partner country has a programme specifically targeting returning migrant women as an entrepreneurial entry pathway.
- Ukrainian displacement – sustained structural impact: The approximately 5 million internally displaced Ukrainians, predominantly women with children, have fundamentally altered the entrepreneurial landscape in western Ukraine and in neighbouring IMPACTA partner countries (Moldova, Hungary, Bulgaria, Croatia). This demographic transformation is not temporary – it requires permanent adaptation of policy frameworks, not emergency responses.

6. Target Group Policy Mapping: Needs, Obstacles, and Policy Responses

This section maps the documented needs and obstacles of each of the six priority target groups against the policy instruments available across the partnership. The mapping identifies three tiers of policy response for each group: instruments that effectively address the documented need; instruments that partially address it with significant implementation gaps; and documented needs with no corresponding policy instrument.

6.1 Mompreneurs (Women with Care Responsibilities)

Coverage

Priority coverage: Primary target group in all 7 partner countries

Core support need: Integrated support combining business development with care-compatible programme design, maternity-sensitive financial instruments, and childcare access or subsidies.

Effective policy instruments:

- Bulgaria Smart Lady Programme (First Investment Bank): maternity-sensitive loan conditions, adapted repayment schedules, mentoring integration (RAPIV 2026)
- Germany KfW Start-up Loan for Women: dedicated financial conditions; EXIST Women for higher education contexts
- Ukraine Municipal Nanny Programme: partial childcare cost compensation (though insufficient — BRIT 2026)
- Moldova ILO/AFAM Childcare Entrepreneurship Pilot: addresses care gap through entrepreneurship model (AFAM 2026)

Partially effective (significant implementation gaps):

- Bulgaria HRDP 2021-2027: explicitly targets mompreneurs but does not integrate childcare provision into programme delivery
- Germany Parental Leave Act: inadequate for self-employed women with fluctuating income (TUM 2026)
- Croatia ESF+: activation support without care-compatible scheduling or childcare integration

Documented needs with no corresponding policy instrument:

- No partner country has an integrated programme combining childcare support + business mentoring + financial instrument in a single accessible pathway
- No operational programme in any EU partner country includes on-site childcare provision during training or mentoring sessions
- Self-employed women's sick-leave rights when a child is ill: absent in Ukraine (BRIT 2026); inadequate in most EU partner countries

Policy Assessment: The care-entrepreneurship nexus is addressed in fragments across the partnership. The Moldova ILO/AFAM model and Bulgaria Smart Lady Programme represent the two closest approximations to integration. Neither has been systematically scaled or replicated.

6.2 Young Women Under 35

Coverage

Priority coverage: Primary target group in all 7 partner countries

Core support need: Entry-level financial instruments without collateral or operating history requirements; confidence-building and peer mentoring; structured transition from training to business creation and growth.

Effective policy instruments:

- Germany TUM/UnternehmerTUM Women's Startups: structured entry-to-scale programme for academic women founders
- Ukraine Vidvazhna accelerator: grant incentive for programme completion; documented 5,000+ participants (USAID/Visa 2023-2024)
- Bulgaria HRDP: young women explicitly targeted with activation and start-up support measures

Partially effective (significant implementation gaps):

- Serbia Gender Equality Strategy 2021-2030: prioritises young women but without dedicated financial instrument
- Moldova ODIMM: training and grants accessible but insufficient growth-stage support
- Germany EXIST Women: university-centred design limits reach to non-academic young women

Documented needs with no corresponding policy instrument:

- No partner country has a structured investment readiness programme specifically for young women moving from training to growth-stage financing
- Operating history requirements (Ukraine 5-7-9% programme: 3 years) categorically exclude new entrepreneurs — the exact group these programmes claim to target
- Growth-stage mentoring and VC pipeline for young women: absent in all countries except partial initiatives in Germany

Policy Assessment: Young women are relatively well served at entry stage (awareness, training, initial grants) and critically underserved at growth stage (investment readiness, scaling finance, sustained mentoring). The activation-to-growth discontinuity documented in D1.1.1 is most acute for this group.

A further support-design lesson reflected particularly clearly in the Hungarian interviews is that financial literacy, basic business planning, and self-confidence should be treated as a closely connected threshold area rather than as separate needs. For many women, the key barrier is not only lack of capital, but also low confidence in handling pricing, cost calculation, market positioning, and other foundational business tasks. This suggests that effective support for young women should treat financial literacy not as an advanced business skill, but as part of early-stage entrepreneurial readiness and confidence-building.

6.3 Women Aged 50+ (Silver Age Entrepreneurs)

Coverage

Priority coverage: Primary target group in Bulgaria, Croatia, Serbia; partial in others
Core support need: Age-sensitive digital upskilling; re-entry support after labour market displacement; flexible programme formats; mentoring addressing specific confidence and market-positioning challenges.

Effective policy instruments:

- Bulgaria HRDP 2021-2027: explicitly includes re-skilling and re-integration measures for women aged 50+
- Bulgaria Sub-measure 6.2 (rural development): explicitly accessible to late-stage career changers
- Germany ESF-co-financed programmes (INA, Power M): serve women re-entering after career interruptions

Partially effective (significant implementation gaps):

- Croatia: women 50+ enter self-employment due to labour market exclusion ('involuntary entrepreneurship' — TECHPARK 2026); support exists for entry but not for transition from necessity to opportunity motivation
- Serbia: older women explicitly recognised in strategy but not in dedicated instruments (ABW 2026)

Documented needs with no corresponding policy instrument:

- No partner country has a digital upskilling programme specifically designed for the pace, format, and starting-point requirements of women aged 50+
- Innovation-programme access for women 50+: excluded by design in most countries — age gradient in programme design not addressed
- No country has an instrument supporting the transition from involuntary to opportunity-driven entrepreneurship for this group

Policy Assessment: Women aged 50+ face a 'double invisibility' in policy design: they are insufficiently served by youth-oriented entrepreneurship programmes and insufficiently targeted by general labour market activation, which focuses on younger groups. Their compound barriers (digital, confidence, age discrimination) require age-sensitive programme architecture that no partner country has fully developed.

6.4 Rural Women

Coverage

Priority coverage: Primary target group in 6 of 7 partner countries (except Germany)

Core support need: Geographic access to support; digital infrastructure and skills; market linkages beyond local economies; agro-processing value-addition support; care infrastructure in rural settings.

Effective policy instruments:

- Bulgaria Sub-measures 6.2/6.4 (Programme for Rural Development): lump-sum start-up and expansion support via LAG/CLLD — most targeted rural instrument in EU partner cluster
- Ukraine FemAgro 2.0 Manufactory: up to 150,000 UAH for agro-processing transition from raw material to finished product (BRIT 2026)
- Croatia LEADER programme: comparable rural access mechanism
- Moldova ODIMM district presence: partial territorial coverage

Partially effective (significant implementation gaps):

- Bulgaria LAG/CLLD: quality varies significantly across regions; administrative complexity remains high for women with limited project-management experience
- Ukraine Wings of Hope Fund: creates rural support access points but limited geographic coverage
- Serbia IPA-funded regional programmes: limited reach and continuity

Documented needs with no corresponding policy instrument:

- No rural instrument in any partner country includes systematic digital upskilling, financial literacy training, or market-access facilitation alongside financial support
- Post-investment business development support for rural women: consistently absent — one-off grants without follow-up
- Rural childcare integration with entrepreneurship support: absent in all partner countries

Policy Assessment: Rural instruments are the most accessible entry pathway for women from disadvantaged backgrounds, but they are structurally designed as activation tools, not growth pathways. A rural woman who receives a Sub-measure 6.2 grant, completes her initial project, and wants to scale her business faces a programme vacuum. There is no 'Sub-measure 6.5' for growth.

6.5 Refugee and Displaced Women

Coverage

Priority coverage: Primary target group in 6 of 7 partner countries; most severely underserved group

Core support need: Legal right to self-employment; administrative navigation support in unfamiliar legal systems; language-adapted training; banking access; psychological support; peer networks in displacement context.

Effective policy instruments:

- Ukraine IDP-focused ecosystem (Vidvazhna, VONA Career Hub, U&WE Hub): most developed refugee women's entrepreneurship infrastructure in the partnership
- Bulgaria UNHCR/Chamber of Commerce model: integrated training and mentoring for refugee women from Afghanistan, Syria, Ukraine (RAPIV 2026)
- Moldova AFAM/NRC EGFLI: 100+ women-led enterprises created by refugee and vulnerable women (2023-2026)
- Germany Startup Migrants, ReDI School, Social Impact Lab Munich: specialised integration organisations

Partially effective (significant implementation gaps):

- Croatia: Ukrainian refugee women named as target group but support instruments partial and project-based
- Germany: fragmented support landscape; migrant women find it 'challenging to identify trustworthy organisations' (TUM 2026)
- Serbia: partial relevance; limited dedicated provision

Documented needs with no corresponding policy instrument:

- Hungary: CATEGORICAL LEGAL EXCLUSION — persons under temporary protection cannot become sole proprietors or establish companies (OIF 2026). No other EU Member State maintains this prohibition
- At the same time, the Hungarian needs assessment points to an important policy contradiction: while the legal framework blocks self-employment for women under temporary protection, some support actors and programmes still attempt to orient refugee women towards entrepreneurship or self-employment. Examples mentioned in the Hungarian report include Incorpora – Self-Employment Programme and SmartUA. This suggests that support intent and programme-level experimentation are already present, but remain only partially effective as long as the regulatory framework continues to block the pathway these initiatives aim to promote.

- No partner country has an integrated, permanent pathway combining legal status + banking access + entrepreneurship support + care provision for refugee women
- Banking access for refugee women: 'almost inaccessible' in Bulgaria due to legal and procedural restrictions (RAPIV 2026)

Policy Assessment: The legal exclusion of temporary protection holders from self-employment in Hungary represents the most severe documented policy failure in the IMPACTA partnership. It is a categorical regulatory barrier that prevents any other support intervention from having effect. Its elimination must be a first-priority advocacy objective for the IMPACTA project.

6.6 Women Engaged in Social Entrepreneurship

Coverage

Priority coverage: Primary target group in 5 of 7 partner countries

Core support need: Legal recognition and dedicated financing architecture; reduced administrative complexity; access to public procurement; investment instruments calibrated for social impact rather than financial return.

Effective policy instruments:

- Germany DSEM ecosystem: most developed monitoring and visibility framework for social enterprise; Auxxo women-focused VC fund, is operational.
- Ukraine Walnut House (Horikhovyi Dim): documented social enterprise model combining economic activity with psychosocial protection
- Bulgaria Smart Lady Sustainable Lady Fund: grants for women-led sustainability projects embedded in mainstream bank product

Partially effective (significant implementation gaps):

- Bulgaria: Social enterprise operates under 4+ legal forms with no unified definition (Bulgarian Center for Not-for-Profit Law 2023)
- Moldova: partial civil society recognition; no social enterprise law but NGO frameworks partially substituting
- Croatia: intermediate position; civil society framework developing

Documented needs with no corresponding policy instrument:

- Ukraine: NO social enterprise law since 2004 — repeated legislative attempts blocked; socially oriented enterprises cannot access dedicated tax relief or official recognition (BRIT 2026)
- Serbia: social enterprise framework not codified; no unified legal status
- Innovation programme access for social enterprises: excluded by technological maturity and consortium requirements in all EU partner countries
- Impact investment for women-led social enterprises: absent as a structured instrument in all partner countries except Germany (partially)

Policy Assessment: The legal invisibility of social entrepreneurship in Ukraine, Bulgaria (de facto), and Serbia constitutes a direct economic harm: organisations cannot demonstrate institutional credibility to funders, cannot access public procurement opportunities, and cannot attract investment calibrated to their model. This is the highest-priority regulatory reform for transnational advocacy.

7. Social Innovation Sector: Dedicated Analysis

7.1 Women's Centrality in the Social Innovation Ecosystem

Across all seven IMPACTA partner countries, women play a disproportionately significant and structurally underrecognised role in social innovation. The most precise documentation is from Germany, where more than every second enterprise registered in the Deutscher Social Entrepreneurship Monitor (DSEM 2024) was co-founded by a woman. In Bulgaria, women dominate social innovation in healthcare, education, sustainable food production, and circular economy sectors (RAPIV 2026). In Ukraine, women-led enterprises in hospitality, wellness, eco-production, and educational services operate with implicit social missions – hosting military personnel at reduced rates, running community literacy programmes, employing vulnerable individuals on flexible terms (BRIT 2026). In Moldova, the AFAM/NRC initiative enabled approximately 100 women-led enterprises operating on social enterprise models (AFAM 2026).

This centrality creates a fundamental policy paradox: the business model most aligned with women's existing labour market participation patterns and values orientation is also the model with the weakest legal recognition, most limited access to finance, and lowest political priority in national policy architectures across five of the seven partner countries.

7.2 Legal Framework Analysis: Five Distinct Positions

Country	Legal status	Definition	Finance access	Assessment
Germany	Operational framework; no dedicated law	No unified SE definition; GmbH/gGmbH forms used	Private impact investors (Auxxo); DSEM visibility; foundations	Most developed ecosystem; finance gap for early-stage SE
Croatia	Partial civil society framework	No unified definition; associations/cooperatives	ESF+ partial access; no dedicated SE financing	Intermediate; developing but not codified
Bulgaria	Multiple legal forms (4+); no unified status	No functional unified definition (BC-NPL 2023)	Grant-dependent ; OP access partial; bank financing rare	Fragmented legal landscape; visibility gap limits access
Hungary	Partial recognition; social cooperatives framework	Social cooperative defined; broader SE undefined	GINOP partial; no dedicated SE fund	Social cooperative pathway exists; broader SE underserved
Moldova	Partial civil society recognition	NGO framework partially substituting; no SE law	Donor-funded; no national SE financing instrument	Civil society strong; formal SE framework absent
Ukraine	NO LAW since 2004	No definition; draft laws repeatedly blocked	No tax relief; no dedicated financing; project grants only	Critical gap: legal invisibility prevents scale and credibility
Serbia	NOT CODIFIED	Framework not established	No dedicated instrument; project-based grants only	Least developed legal framework; strategic documents acknowledge gap

Social Innovation Finding 7.2: Four of the seven partner countries (Ukraine, Serbia, Moldova, Bulgaria) lack a functional legal framework for social enterprise. This is not a regulatory technicality: without formal recognition, social enterprises cannot access tax benefits, cannot demonstrate institutional credibility to investors, and are excluded from public procurement frameworks designed for SE. The economic cost of legal invisibility falls disproportionately on women, who constitute the majority of social enterprise founders across the partnership.

7.3 Financing Architecture for Social Innovation

The financing architecture for women-led social enterprises across the partnership is characterised by four structural weaknesses, documented consistently across expert interviews and needs assessments:

- **Grant dependency without transition pathway:** Social enterprises across all seven countries rely predominantly on project-based grant funding from EU programmes, international donors, or government schemes. No partner country has a transition financing instrument (repayable grant, social impact bond, revenue-based financing) bridging from grant dependency to financial sustainability.
- **Mismatched financing instruments:** Commercial bank financing requires collateral, profit orientation, and financial performance documentation that social enterprises structurally cannot provide. Impact investment remains nascent in all countries except Germany (Auxxo fund). Blended finance instruments combining grant and commercial components are absent or limited to pilot scale.
- **Public procurement exclusion:** Social enterprises in Ukraine, Serbia, and Moldova cannot systematically participate in social services procurement due to the absence of formal legal status. Germany's social enterprise ecosystem benefits from established procurement frameworks; other partner countries do not.
- **Skills deficit compounding finance deficit:** Women social entrepreneurs consistently demonstrate strong social mission commitment but limited competencies in financial planning, impact measurement, and investor communication – skills required to access any financing instrument more sophisticated than an outright grant. This skills-finance interaction constitutes a compound access barrier not addressed by any national policy framework.

7.4 Social Innovation and Environmental Sustainability: An Emerging Intersection

Women-led social enterprises are increasingly operating at the intersection of social inclusion and environmental sustainability – circular economy production, sustainable food systems, eco-tourism, community energy, and green social services. This positions them as strategic actors in the green transition, but the policy architecture has not recognised or capitalised on this convergence.

Documented examples from D1.1.1 evidence: Bulgaria's WE.Circular initiative (); Ukraine's eco-production women entrepreneurs (BRIT 2026); Moldova's agro-tourism and artisanal food social enterprises; Germany's green social entrepreneurship ecosystem (Social Entrepreneurship Academy programmes). None of these operate within a dedicated policy instrument that combines gender-responsiveness, social enterprise recognition, and green transition support simultaneously.

Social Innovation Finding 7.4: The green-social intersection represents a strategic opportunity for IMPACTA. Women-led social enterprises in circular economy, sustainable food, eco-tourism, and community energy are already active across the partnership but are policy-invisible at this intersection. A dedicated benchmarking focus on this convergence in D1.1.3, combined with policy advocacy for green SE recognition in D1.1.2 recommendations, would position IMPACTA uniquely in the transnational policy debate.

8. Integrated Policy Gap Assessment

8.1 Synthesis: Ten Documented Policy Failures

The integrated analysis of EU and national policy frameworks, social and environmental factors, target group policy mapping, and social innovation sector assessment produces a consolidated set of ten documented policy failures across the IMPACTA partnership. These failures are 'documented' in the precise sense: each is supported by specific evidence from partner country needs assessments and quantitative data. They are 'failures' in the specific sense that they represent gaps between the stated objectives of existing policy frameworks and the measured outcomes for target groups.

ID	Failure type	Countries affected	Evidence and mechanism
F1	Design failure: Gender-neutral instrument architecture	Universal (all 7)	All primary instruments — ESF+, ERDF, national OPs — are designed without gender-specific objectives, targets, or delivery adaptations. Formal eligibility does not produce substantive access for women from disadvantaged backgrounds. Documented by all 7 partner country needs assessments (2025-2026).
F2	Structural failure: Childcare absent from entrepreneurship programme design	Universal (all 7)	Formal childcare coverage: MD 15% UA 15.77% BG 21.2% DE 35.5% (deficit 383,600 places). No partner country integrates childcare subsidies, on-site provision, or care-compatible scheduling into entrepreneurship programme design. All 50+ expert interviewees across all 7 countries cited this as primary barrier.
F3	Regulatory failure: Categorical exclusion of refugee women from self-employment	Hungary (critical); partial in others	Persons under temporary protection CANNOT become sole proprietors or establish companies under Hungarian law (OIF 2026). This legal exclusion has no equivalent in any other EU Member State. It directly contradicts EU temporary protection framework objectives and EU Social Pillar commitments.
F4	Regulatory failure: Absence of social enterprise law	Ukraine, Serbia, Bulgaria (de facto), Moldova	Ukraine has no SE law since 2004 (repeated legislative failures). Serbia: not codified. Bulgaria: 4+ legal forms without unified definition. Moldova: partial civil society recognition. Consequence: tax exclusion, public procurement exclusion, investor credibility gap — all falling disproportionately on women founders.
F5	Structural failure: Activation-to-growth discontinuity	Universal (all 7)	ESF-funded activation programmes support entry; ERDF-funded competitiveness programmes support scale. The intermediate stage — stabilisation, market development, investment readiness — has no corresponding instrument in any partner country. Documented explicitly in HR, BG, UA, DE, HU, MD, RS.
F6	Implementation failure: Operating	Ukraine (most critical);	Ukraine 5-7-9% preferential lending: 3-year operating history requirement. Categorically excludes early-stage businesses despite

ID	Failure type	Countries affected	Evidence and mechanism
	history requirements excluding new entrepreneurs	partial in others	programme intent. eRobota grant ceiling insufficient for capital-intensive activities. All 9 BRIT interviewees (2026) identified this as systemic exclusion.
F7	Implementation failure: Parental/maternity systems disadvantaging self-employed	Germany, Ukraine; partial in all	DE: income-based parental benefit structure excludes early-stage self-employed women (TUM 2026). UA: self-employed women lack sick-leave rights when child is ill (BRIT 2026). UA: 97% parental leave taken by women / 3% men — structural care asymmetry reinforced by policy design.
F8	Data failure: Absence of gender-disaggregated MSME data	Serbia, Ukraine, Bulgaria, Moldova critical; all countries partial	Serbia GES 2021-2030 acknowledges gender-data gap on MSME performance. Moldova: no official data on women-led social enterprises. Ukraine: no official data on digitalisation of women-owned businesses. Bulgaria: Not official data Without data, evidence-based policy design is impossible.
F9	Policy failure: EU Pay Transparency Directive non-implementation	Germany, Hungary primary	DE: no government action plan by March 2026 (Amnesty International 2025). HU: gender pay gap increasing since 2020 (Amnesty International 2025). Both countries have the most entrenched GPG trends in the EU partner group and the weakest implementation response.
F10	Innovation failure: No gender lens in national innovation strategies	Universal (all 7)	No partner country includes gender-specific objectives, gender-disaggregated targets, or provisions addressing structural barriers for women entrepreneurs in national innovation or smart specialisation strategies. Innovation programme benefits remain concentrated among highly educated, urban, typically male entrepreneurs.

9. Policy Recommendations

The following seven strategic policy recommendations are derived directly from the ten documented policy failures in Section 8. Each recommendation specifies the evidence base, the primary countries where reform impact would be highest, the implementation pathway, and the IMPACTA project activity through which it can be advanced. Recommendations are stratified by implementation horizon and policy level.

R1 — Immediate / National Legislative Action | Eliminate the categorical legal exclusion of temporary protection holders from self-employment in Hungary

Addresses: F3 — Regulatory failure (Hungary) Evidence: Persons under temporary protection cannot become sole proprietors or establish companies under Hungarian law (OIF 2026). This has no equivalent in any other EU Member State and directly contradicts EU Temporary Protection Directive objectives and EU Social Pillar commitments. Primary countries: Hungary (primary); comparative evidence from Bulgaria UNHCR/CCI model and Moldova EGFLI initiative Implementation pathway: HETFA to develop comparative legal analysis of EU temporary protection entrepreneurship provisions; document economic cost of exclusion using UNHCR employment data; submit evidence to Hungarian Ministry of Interior and EU Commission DG HOME; use IMPACTA transnational platform for advocacy. IMPACTA connection: D1.1.2 policy recommendation — immediate. Pilot activity in Hungary conditional on legislative change or alternative legal pathway (e.g., employment-based business participation).

R2 — Short-term / National Legislative Action | Adopt social enterprise legal frameworks in Ukraine, Serbia, Bulgaria, and Moldova

Addresses: F4 — Regulatory failure (4 countries) Evidence: Ukraine: no SE law since 2004 (BRIT 2026). Serbia: not codified (ABW 2026). Bulgaria: 4+ legal forms, no unified definition (BC-NPL 2023). Moldova: partial civil society framework (AFAM 2026). Consequence: tax exclusion, procurement exclusion, investor credibility gap. Primary countries: Ukraine (most urgent — draft law exists and has been blocked multiple times); Serbia; Bulgaria; Moldova Implementation pathway: BRIT to document economic impact of SE legal vacuum using enterprise registration and revenue data; comparative analysis of EU SE models (Germany gGmbH, Italian social cooperative law, French ESS law); develop model law provisions applicable to candidate country contexts; submit via EU accession working groups. IMPACTA connection: D1.1.2 advocacy input. D1.1.3 benchmarking of SE legal models. Partner organisations to use IMPACTA evidence base in national legislative engagement.

R3 — Medium-term / National Programme Redesign | Integrate childcare support into all entrepreneurship programme designs across the partnership

Addresses: F2 — Structural failure (all 7 countries) Evidence: Formal childcare coverage: MD 15% | UA 15.77% | BG 21.2% | DE 35.5% (deficit 383,600 places). No partner country integrates childcare support into entrepreneurship OP design. Moldova ILO/AFAM Childcare Entrepreneurship Pilot demonstrates market-creation alternative at low cost. Primary countries: All 7 countries — most urgent in Moldova, Ukraine, Bulgaria Implementation pathway: Scale Moldova ILO/AFAM Childcare Entrepreneurship Pilot to Bulgaria (via LAG/CLLD framework), Croatia (LEADER), and Ukraine (Municipal Nanny expansion). Develop minimum standard for childcare integration in entrepreneurship programme design (scheduling flexibility, on-site provision options, care voucher models). Advocate for integration as mandatory element in ESF+ Managing Authority guidelines. IMPACTA connection: D1.1.3 benchmarking priority. Pilot activity design standard. Advocacy input for ESF+ programme revision.

R4 — Medium-term / EU-level Advocacy | Introduce mandatory gender-disaggregated targets in ESF+ and ERDF programme design

Addresses: F1 + F10 — Design and innovation failures (all 7) Evidence: Both ESF+ and ERDF Regulations (2021-2027) are gender-neutral at programme design level. No mandatory gender-disaggregated output targets exist for SME creation, business survival, or innovation investment. National innovation strategies (all 7 countries) contain no gender-specific objectives. Primary countries: All 4 EU Member States (BG, HR, DE, HU) as primary advocacy targets; EU candidate countries via IPA advocacy Implementation pathway: HETFAs and RAPIVs to document quantified opportunity cost of gender-neutral ERDF design using MSME performance data disaggregated by gender where available; develop model programme condition language for gender-responsive ERDF/ESF+ design; submit via ESIF monitoring committee processes and European Parliament channels; align with EU Gender Equality Strategy mid-term review process. IMPACTA connection: D1.1.2 advocacy document — EU level. Study visit programme to include EU Commission DG REGIO engagement. Position paper for transnational dissemination.

R5 — Medium-term / National Programme Redesign | Establish structured activation-to-growth bridging mechanisms in all EU partner countries

Addresses: F5 + F6 — Structural and implementation failures (all 7) Evidence: The activation-to-growth discontinuity (first documented in TECHPARK Croatia 2026) is confirmed across all 7 partner countries. Women enter entrepreneurship via ESF activation programmes and are left without support at the stabilisation and growth stages. Ukraine's 3-year operating history requirement for preferential lending categorically excludes all new entrepreneurs. Primary countries: Croatia (analytical lead), Bulgaria, Hungary (immediate ESF redesign opportunity); Ukraine (reform of 5-7-9% eligibility criteria) Implementation pathway: TECHPARK activation-to-growth

framework to be developed as a cross-country advocacy and programme design tool. Identify specific bridging mechanism needed per country cluster: business development grants (BG, HR), accelerator cohort (HU, RS), investment readiness programme (DE, MD), operating history waiver for women-led early-stage businesses (UA). IMPACTA connection: Core design principle for IMPACTA Toolkit. D1.1.3 benchmarking of bridging instruments. Partner capacity-building workshop agenda item.

R6 — Short-term / EU Compliance Action | Accelerate EU Pay Transparency Directive transposition in Germany and Hungary

Addresses: F9 — Policy failure (Germany, Hungary) Evidence: Germany: no government action plan for transposition by March 2026 (Amnesty International 2025). Hungary: GPG increasing since 2020 despite EU obligations (Amnesty International 2025). EU Pay Transparency Directive transposition deadline: June 2026. Primary countries: Germany and Hungary (primary); all EU Member States for monitoring Implementation pathway: TUM Int'l and HETFA to document the entrepreneurship-specific consequences of pay gap persistence: reduced personal investment capital, lower creditworthiness, higher collateral shortfall. Submit evidence to EU Commission infringement assessment process. Support civil society advocacy through comparative GPG data from EIGE and WEF GGGR. IMPACTA connection: D1.1.2 advocacy annex. Partner policy engagement activity. Monitoring indicator for mid-term evaluation.

R7 — Short-term / National Statistical Reform | Establish minimum gender-disaggregation standards for MSME data across all partner countries

Addresses: F8 — Data failure (all 7 countries) Evidence: Serbia GES 2021-2030 acknowledges gender-data gap on MSME performance. Moldova: no official data on women-led social enterprises. Ukraine: no official data on digitalisation of women-owned businesses. Bulgaria: sectoral distribution N/A. Without sex-disaggregated enterprise data, evidence-based policy design for any of the other six recommendations is impossible. Primary countries: Serbia and Ukraine (most critical gaps); Moldova, Bulgaria (priority); Germany, Croatia, Hungary (improvement needed) Implementation pathway: Each IMPACTA partner organisation to submit formal request to national statistical office and programme managing authority for minimum gender-disaggregation standards: (a) business creation by founder gender; (b) enterprise size distribution by gender; (c) access to finance by gender; (d) sectoral distribution by gender; (e) business survival rates by gender. HETFA to develop model statistical indicator template applicable across all 7 countries. IMPACTA connection: D1.1.2 technical annex. Data collection component of pilot activity monitoring. Input to D1.1.3 benchmarking methodology.

10. Conclusions and Forward Link to D1.1.3

10.1 Synthesis of Principal Findings

The comparative policy and systematic analysis produced in D1.1.2 confirms, deepens, and extends the diagnostic baseline established in D1.1.1. Five principal conclusions define the analytical contribution of this document:

- Policy architecture is not the binding constraint. All seven partner countries have legislative frameworks, gender equality strategies, and operational programmes that formally address women's entrepreneurship. The binding constraint is design quality: programmes calibrated for established businesses, care-blind delivery, gender-neutral objectives, and fragmented navigation pathways that effectively exclude the most disadvantaged women while maintaining formal inclusivity.
- Three regulatory emergencies require priority attention. The categorical legal exclusion of Ukrainian refugee women from self-employment in Hungary (OIF 2026); the absence of social enterprise law in Ukraine since 2004; and the systematic exclusion of early-stage businesses from Ukrainian preferential lending — these are not gradual reform priorities. They are documented exclusions with immediate, measurable economic consequences for the IMPACTA target groups.
- Care infrastructure is the foundational enabler. The absence of childcare integrated with entrepreneurship support is the only finding achieving complete cross-country consensus. The Moldova ILO/AFAM Childcare Entrepreneurship Pilot demonstrates a market-creation solution applicable across the partnership. Its systematic replication is the single highest-impact scaling opportunity available to IMPACTA partners.
- Social enterprise legal recognition is a women's economic rights issue. Women constitute the majority of social enterprise founders across the partnership. Their disproportionate presence in a business model with the weakest institutional recognition, most limited financing architecture, and lowest political priority is not coincidental — it reflects the systematic undervaluation of care-oriented, community-embedded, and socially motivated economic activity.
- Transnational policy advocacy is both necessary and feasible. Five of the ten documented policy failures (F1, F2, F4, F5, F10) cannot be resolved by any single country alone because they reflect common design features of EU instruments or the shared absence of legislative frameworks. The IMPACTA project's transnational platform — covering seven countries across four distinct ecosystem tiers — provides a uniquely credible evidence base for EU-level advocacy and cross-country reform learning.

10.2 Link to D1.1.3: Benchmarking Portfolio Priorities

D1.1.3 (Benchmarking Analysis / Portfolio-Handbook) should prioritise documentation of good practices that directly address the ten policy failures identified in Section 8 and the seven recommendations in Section 9. Based on the policy analysis in this document, the following benchmarking priorities are recommended:

Policy failure addressed	D1.1.3 benchmarking priority	Specific practices to document
F2: Care infrastructure gap	Childcare-integrated entrepreneurship models	ILO/AFAM Childcare Entrepreneurship Pilot (MD); Municipal Nanny enhancement (UA); Smart Lady maternity-sensitive loan (BG)
F3: Refugee exclusion (HU)	Integrated refugee women's entrepreneurship pathways	UNHCR/BCC Bulgaria model; EGFLI Moldova; VONA Ukraine; Startup Migrants Germany
F4: Social enterprise law absence	SE operating models without dedicated legal framework	Walnut House Ukraine;; DSEM-monitored women-led SE Germany
F5: Activation-to-growth gap	Bridging mechanism models	Vidvazhna Ukraine; UnternehmerTUM Women's Startups DE; Sub-measure 6.4 Bulgaria
F1+F10: Gender-neutral design	Gender-responsive OP design examples	HRDP Bulgaria (most explicit EU OP); eRobota/Vlasna Sprava Ukraine; Smart Lady BG
F8: Data gaps	Gender-disaggregated monitoring frameworks	DSEM Germany; Female Founders Monitor DE; GEM Hungary Special Report methodology
Green-social intersection	Women-led green social enterprises	WE.Circular BG; eco-production UA; sustainable agro-food MD; eco-tourism HR

EU Policy Instruments Reference Table

EU Instrument	Key provisions for women's entrepreneurship	Status / applicability
EU Gender Equality Strategy 2020-2025	Framework for gender mainstreaming; pay gap reduction; work-life balance	Non-binding; variable national implementation
Work-Life Balance Directive 2019/1158	Parental leave, carers' leave; self-employed women partially covered	Binding EU-4; candidate countries: accession alignment
ESF+ Regulation 2021-2027	Labour market inclusion; skills; entrepreneurship as secondary outcome	Gender-neutral by design; activation programmes most accessible
ERDF Regulation 2021-2027	Innovation; SME competitiveness; high admin thresholds	Excludes micro/early-stage; no gender-specific targets
EU Pay Transparency Dir. 2023/970	Pay gap reporting; 100+ employee threshold	Transposition June 2026; DE and HU delayed
EU Social Economy Action Plan 2021	Recognises SE; supports legal frameworks	Non-binding; 4/7 partner countries lack SE law
EU Temporary Protection Dir. 2001/55	Protection for displaced persons; right to employment	HU: self-employment excluded — unique violation of spirit of Directive
IPA III 2021-2027	Pre-accession support for MD, RS, UA	Gender-specific components partial; project-based
CAP 2021-2027	Agricultural and rural development; LEADER; sub-measures	BG 6.2/6.4 and HR LEADER most relevant; no gender-specific provisions
EU Green Deal / European Climate Law	Green transition; CSRD; EU Taxonomy	No gender-disaggregated impact assessment for micro-enterprises

Glossary of Key Policy Terms

Activation-to-Growth Discontinuity: Structural gap between ESF-funded labour market activation programmes (accessible to disadvantaged women at entry stage) and ERDF-funded competitiveness programmes (inaccessible due to high thresholds). First analytically defined by TECHPARK Croatia (2026); confirmed across all 7 partner countries.

Formal Equality Gap: The documented divergence between formal legal equality provisions (anti-discrimination law, gender equality strategies) and substantive entrepreneurial access for women from disadvantaged backgrounds. Universal across all 7 partner countries.

Gender-Responsive Programme Design: Programme architecture that addresses gender-specific barriers through dedicated financial instruments, care-compatible scheduling, digital accessibility, culturally sensitive content, and intersectional targeting — as distinct from gender-neutral programme design that formally includes women without adapting to structural constraints.

Social Enterprise (SE): A business that explicitly prioritises social, environmental, or community objectives alongside or above financial return. Women constitute the majority of SE founders across the IMPACTA partnership. Legal status varies: recognised in Germany and Croatia (partial); absent in Ukraine, Serbia; fragmented in Bulgaria and Moldova.

Systemic Accessibility: Methodological principle applied throughout D1.1.1 and D1.1.2: assessment of how effectively policies reach women from disadvantaged backgrounds in practice, rather than assessment of formal eligibility provisions. A formally inclusive programme that is inaccessible in practice is assessed as failing the systemic accessibility standard.

Temporary Protection Status (TPS): Legal status granted to Ukrainians displaced to EU Member States under Council Implementing Decision 2022/382 (March 2022). Confers right to employment, education, and social welfare. In Hungary, uniquely interpreted to exclude self-employment — a national implementation choice with no EU-level equivalent.

Annex 3

Primary Sources Referenced in D1.1.2

All policy evidence cited in this document is drawn from the following primary sources, supplemented by the EU legislation and international comparative frameworks listed below. Partner country needs assessment reports constitute the primary evidential foundation; external sources provide statistical and legislative context.

- RAPIV (Bulgaria, 2026): Needs Assessment Report — Women in Business in Bulgaria. IMPACTA project. Regional Agency for Entrepreneurship and Innovations — Varna.
- TECHPARK (Croatia, 2026): Needs Assessment Report — Women in Business in Croatia. IMPACTA project. Technology Park Zagreb / TECHPARK.
- TUM Int'l (Germany, 2026): Needs Assessment Report — Women in Business in Germany, Version 1. IMPACTA project. TUM International GmbH.
- HETFA (Hungary, 2026): Needs Assessment Report — Women in Business in Hungary. IMPACTA project. HETFA Research and Consulting Institute.
- AFAM (Moldova, 2026): Needs Assessment Report — Women in Business in the Republic of Moldova. IMPACTA project. Agency for Women Entrepreneurs of Moldova.
- ABW (Serbia, 2026): Needs Assessment Report — Women in Business in Serbia. IMPACTA project. ABW Association of Business Women in Serbia.
- BRIT (Ukraine, 2026): Needs Assessment Report — Women in Business in Ukraine (Revised). IMPACTA project. NGO “Bureau of Research, Innovations and Technologies” — BRIT.
- EU Legislation: Work-Life Balance Directive 2019/1158; ESF+ Regulation 2021/1057; ERDF Regulation 2021/1058; Pay Transparency Directive 2023/970; Temporary Protection Directive 2001/55/EC; Social Economy Action Plan 2021; EU Gender Equality Strategy 2020-2025.
- Statistical sources: Eurostat; Destatis (Germany); NSI Bulgaria; CBS Croatia; KSH Hungary; NBS Moldova; Statistical Office of Serbia; State Statistics Service Ukraine; World Bank Enterprise Surveys 2023; GEM Hungary Special Report 2024; EIGE Gender Equality Index 2024-2025; WEF Global Gender Gap Report 2025; UNICEF; UNFPA; ILO; Amnesty International 2025; OECD; Bertelsmann Stiftung.
- Sectoral sources: Female Founders Monitor 2024 (Bertelsmann); Deutscher Social Entrepreneurship Monitor (DSEM) 2024; RE-FEM Research Report 2023; Bulgarian Center for Not-for-Profit Law 2023; OIF Hungary (National Directorate-General for Aliens Policing) 2026.