## EWL draft response to the European Commission’s Public Consultation on Pay Transparency EWAR

26.05.2020

We are very sorry for the late response due to the time it took to consult member organisations.

First of all, EWAR is absolutely supportive of the goal of reducing and eliminating the gender pay gap and building a gender equal society. It has been dealing with the gender pay gap since 2008, raising awareness and explaining what the gender pay gap is, what it entails and what has been done in other countries to reduce it. EWAR has been going deep into the subject since 2018/2019 in connection with a proposed amendment to the Estonian Gender Equality Act, one of the objectives of which was increasing pay transparency and which was accompanied by extensive debates by a wide range of stakeholders. The bill was dropped from the parliamentary proceedings in 2019.

Below is the summary of views of our members concerning the proposed pay transparency measure.

EWAR members reasoning was based on the understanding that Estonia has made quite some progress in reducing the gender pay gap; it has decreased 8.2% over the past 12 years. (30.9% in 2007; and 22.7% in 2018).

[*https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=sdg\_05\_20&plugin=1*](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=sdg_05_20&plugin=1)

Given this, the majority of EWAR’s member organisations -  seeing huge differences in the gender pay  statistics due to concrete socio-economic and historical/cultural backgrounds in MSs, the high administrative burden of the proposed measure, especially for (very) small organisations,  the (widespread) lack of expertise to properly apply it -  were not supportive of the uniform binding instrument. It was also suggested to run in some MS a pilot project to see the full benefit of the pay transparency measure and, equipped with a best practice model, to replicate it in other MSs.

However, we make a note that one of our member organisations, Kadri, which joins social democratic women, is fully supportive a legislative measure (Directive) on pay transparency.  We attach their arguments in support of the directive (in Estonian).

We also attach EWAR’s opinion about the pay transparency measure presented to the Ministry of Social Affairs that is responsible for promoting gender equality in Estonia. (in Estonian)