

## Commentary on Concept Addendum General Recommendation No. 30

The Dutch CEDAW Network (hereinafter: the Network) welcomes the invitation to submit comments to the advance unedited version of the Addendum to General Recommendation No. 30 (2013) on women in conflict prevention, conflict and post-conflict situations.

The Network commends the Committee's work on the Addendum to GR30, which effectively responds to the evolving global and political context and advances the Women, Peace and Security (WPS) agenda. It is highly valuable that the Addendum consolidates obligations and standards across international legal and normative frameworks by gender sensitive interpretation. Furthermore, the Network wishes to express its appreciation for the Committee's thorough and substantive background paper on *Evolving Norms and Changing Directions*.

In this submission, the Network offers concrete suggestions on specific paragraphs drawn from the insights and expertise of the NGOs and experts contributing to the Network and reflects key aspects of the Women, Peace and Security agenda within the broader CEDAW normative framework

### Introduction

*Para 2.* The Network wonders whether the Committee would consider a more comprehensive update of GR30, in a manner similar to the revision of other GRs. In the Network's view, such an update would further enhance the effectiveness of the Convention's implementation and offer additional tools to strengthen the position of women and girls during and after conflict. Such a revision could provide insight into how the CEDAW framework has evolved in relation to the WPS agenda, by drawing examples from relevant Concluding Observations to State Parties (COs) related to WPS and, in that sense, complement the Addendum. Another possibility is to include such examples in the Addendum. The Network will present some opportunities in this submission.

*Para 4.* The Network would like to draw the Committee's attention to the OSCE-wide WPS Roadmap<sup>1</sup>, which highlights a broad range of good practices for advancing the implementation of the WPS agenda across diverse security contexts. As well as the recent NATO Policy on WPS<sup>2</sup>. The Network wonders whether these could be useful references for the Committee's work.

*Para. 6-7.* The Network commends the inclusion of Feminist Foreign Policy (FFP) in this section and recommends further emphasising the need to align it with the WPS agenda and GR40<sup>3</sup>, tackling the root causes of gendered insecurity and injustice requires that the WPS agenda be applied holistically across the full spectrum of domestic and foreign-policy tools. We propose explicitly recommending that States use WPS as a "tool to secure women's rights and achieve gender-responsive peace in all contexts"<sup>4</sup>, including in diplomacy, trade, development cooperation, defence, immigration, and security services<sup>5</sup>.

<sup>1</sup> OSCE, *OSCE WPS Roadmap*, (2025), <https://www.osce.org/sites/default/files/f/documents/4/1/590384.pdf>, at 23-34.

<sup>2</sup> NATO, *NATO Policy on Women, Peace and Security*, (2024), <https://www.nato.int/en/about-us/official-texts-and-resources/official-texts/2024/07/10/nato-policy-on-women-peace-and-security-2024>.

<sup>3</sup> GR40 para 60-61.

<sup>4</sup> Idem para 60.

<sup>5</sup> Sophia Close & Siad Darwish, *Status Quo or Bold Adaptation? Reclaiming the Women, Peace and Security Agenda*, European Institute of Peace, (2025), at 6.

## **Survivor-centric justice**

*Para 8-11.* The Network applauds the elaborate emphasis on the need for survivor-centric justice. We see the opportunity to explicitly include an intersectional lens, whose importance is underscored by GR28<sup>6</sup>. Additionally, GR33<sup>7</sup> highlights that intersecting factors of discrimination make it more difficult for women from marginalised groups to gain access to justice. That is why we suggest referring to the intersecting factors of discrimination that shape survivors' experiences of violence, exclusion, and their access to justice.

*Para 9.* The Network suggests explicitly mentioning the role of survivor-led organisations in shaping access to justice mechanisms. UNSCR 2467<sup>8</sup> encourages States to support women-led and survivor-led organisations. This aligns with GR33<sup>9</sup>, which emphasises prioritising survivors' needs and experiences. Similarly, the WPS agenda stresses that interventions be developed through meaningful consultation with survivors<sup>10</sup>. To achieve this, States must ensure institutional support for survivor-led, women's, youth-led, grassroots, rural, Indigenous and feminist organisations, whose contributions are essential to inclusive and accessible justice pathways, as emphasised in GR33<sup>11</sup> and GR39<sup>12</sup>. The Committee's COs on the Congo illustrate good practice in defining State obligations<sup>13</sup>.

## **Shifting the shame and stigma to the perpetrator**

*Para 12.* The Network sees an opportunity to acknowledge that men and boys may also be subjected to sexual violence in conflict and post-conflict settings, as recognised in UNSCR 2467<sup>14</sup>. Further, the Network suggests elaborating on the role of men and boys in countering the shaming and stigmatisation of survivors of gender-based violence (GBV). Both GR35 and the WPS agenda underscore the importance of engaging men and boys to ensure the sustainable implementation of WPS commitments and the realisation of feminist peace<sup>15</sup>. The Network sees the opportunity to cross-reference GR35's guidance on addressing harmful gender stereotypes, including measures to prevent stigmatisation and victim-blaming<sup>16</sup>. In addition, the Committee's COs on Congo, for instance, call for comprehensive awareness-raising campaigns to combat discriminatory stereotypes that negatively affect women and girls as well as men and boys, and that fuel GBV<sup>17</sup>.

## **Women as leaders in WPS**

*Para 14.* The Network encourages further clarification of why women's leadership, in all its diversity, is essential, and suggests drawing on GR40 to ground this more firmly. GR40 highlights women not only as victims of violence but also as key players, leaders and decision-makers in peacebuilding and in sustaining peace<sup>18</sup>.

## **Expanding the lens of conflict-related sexual violence**

*Para 17.* The Network welcomes the reference to victim-survivors of CRSV and suggests clarifying at the outset that CRSV can be perpetrated against women, men, girls, and boys, and may be directly or indirectly linked to conflict. And that it may also intersect with other

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<sup>6</sup>GR28 para 18.

<sup>7</sup>GR33 para 8.

<sup>8</sup> S.C. Res. 2467, para 20.

<sup>9</sup> Idem, para 14.

<sup>10</sup> Dutch NAP Partnership, *Women, Peace, and Security: NAP 1325-IV*, (2020).

<sup>11</sup> GR33 para 5.

<sup>12</sup> GR39 para 24.

<sup>13</sup> CEDAW, *Concluding observations on the eighth periodic report of the Congo*, CEDAW/C/COG/CO/8 (2019) [hereinafter CO Congo1] para 11.

<sup>14</sup> S.C. Res. 2467, para 28.

<sup>15</sup> Close & Darwish, *supranote 4*, at 51.

<sup>16</sup> GR35 para 35.

<sup>17</sup> CEDAW, *Concluding observations on the eighth periodic report of the Congo*, CEDAW/C/COG/CO/8 (2025) [hereinafter CO Congo2] para 22.

<sup>18</sup> GR40 para 5.

identity factors. The Network further sees an opportunity to reflect the diversity of acts CRSV encompasses. As underscored in GR35, sexual violence often occurs on a continuum of multiple and interrelated forms of violence, in both public and private settings<sup>19</sup>. In this context, the Addendum could acknowledge that conflict may exacerbate domestic violence through the reinforcement of harmful gender stereotypes and rigid masculinities<sup>20</sup>.

*Para 18.* The Network proposes elaborating the role of local communities in preventing CRSV and advancing accountability, as is highlighted by GR35 and GR33<sup>21</sup>.

### **Sexual violence by UN peacekeepers and aid workers**

*Para 23.* The Network sees an opportunity to further highlight the consequences of sexual exploitation, abuse, and harassment (SEA) by peacekeepers and aid workers. Victim-survivors often face stigma and social exclusion<sup>22</sup>, and in cases where SEA results in pregnancy, women are left to bear the full responsibility of caregiving. These harms have long-term impacts not only on the women themselves but also on the children born out of SEA. The Network suggests referring to, for instance, the COs for Niger, where the Committee mentions the need to ensure that victim-survivors and children born of rape are protected from stigma, discrimination and exclusion<sup>23</sup>

### **Women refugees and humanitarian assistance**

*Para 29.* UNSCR 1265 recognises that women, refugees, and internally displaced people are particularly vulnerable in armed conflict and welcomes the integration of a gender perspective in humanitarian assistance<sup>24</sup>. Building on this, the Network suggests further elaboration on the gendered vulnerabilities of refugee women and girls, including increased risks of GBV, barriers to health care, and impoverishment<sup>25</sup>. These vulnerabilities further entrench inequalities and hinder safe access to humanitarian assistance, not only in countries of displacement but also in transit and resettlement. Women and girl refugees must have access to relief and recovery everywhere<sup>26</sup>. In line with this, several COs emphasise the importance of gender-sensitive humanitarian assistance that addresses the specific needs of women and girls<sup>27</sup>.

*Para 30.* The Network sees value in further elaborating why the inclusion of women- and refugee-led organisations is essential. Displaced women and girls are best positioned to articulate their own needs, and humanitarian responses are most effective when informed by their expertise. This can be cross-referenced with GR40<sup>28</sup>, which underscores that women must be actively included in decision-making.

### **Early warning gender indicators of conflict**

*Para 31.* The Network sees an opportunity to further strengthen this section by emphasising the value of an intersectional approach to early warning indicators. Such indicators may include patterns of repression against LGBTQI people, the rise of militarised masculinities, increased targeting of women's rights defenders and civil society organisations, and escalating violence against marginalised ethnic, religious or other

<sup>19</sup> GR35 para 6.

<sup>20</sup> Close & Darwish, *supranote 4*.

<sup>21</sup> GR35 para 34-39.; GR33 para 65.

<sup>22</sup> CEDAW, *Evolving Norms and Changing Directions*, (2025), at 79-82.

<sup>23</sup> CEDAW, *Concluding observations on the fifth periodic report of the Niger*, CEDAW/C/NER/CO/5, (2024), para 32.

<sup>24</sup> S.C. Res. 1265, preamble.

<sup>25</sup> U.N. High Comm'n. Refugees, *Sexual and Gender- Based Violence Syrian Refugees in Jordan*, (2014), at 1-2.

<sup>26</sup> Dutch NAP Partnership, *supranote 8*, at 26-27.

<sup>27</sup> CEDAW, *Concluding observations on the tenth periodic report of Canada*, CEDAW/C/CAN/CO/10 (2024), para 46.; CEDAW, *Concluding observations on the combined seventh and eighth periodic report of Spain*, CEDAW/C/ESP/CO/7-8 (2015), para 37.; CO Congo1 para 49.

<sup>28</sup> GR40, para 27.

minority groups<sup>29</sup>. The Network also notes that women's and LGBTQI organisations are often among the first to detect emerging risks -comparable with "the canary in the coalmine".

### Antipersonnel mines

*Para 40-42.* The Network highlights UNIDIR's report<sup>30</sup> on the gendered impacts of explosive weapons and suggests it may be a useful reference for the Addendum.

### Arms transfers

*Para 43.* The Network wonders whether the Committee may wish to introduce this section with a brief explanation of how the international arms trade, GBV, and militarism are interlinked. For example, the Addendum could note that "*the availability and proliferation of conventional weapons through international arms transfers can heighten insecurity and increase risk of sexual and gender-based violence (SGBV)*"<sup>31</sup>. *The circulation of weapons facilitates GBV in both conflict and non-conflict settings and disproportionately affects women and girls*". Such wording could help underscore the importance of critically engaging with militarism and prioritising peace-centred, non-violent approaches, including civil society, to conflict prevention<sup>32</sup>.

*Para 46.* The Network sees an opportunity to cross-reference this section with relevant COs<sup>33</sup> concerning State obligations regarding arms transfers that may facilitate GBV. For example, in its COs for Germany<sup>34</sup>, the Committee recommends conducting comprehensive and transparent assessments of the impact of arms on women. This approach aligns closely with the WPS agenda, which calls for accountability and the integration of a gender perspective across all levels of arms control, with particular emphasis on the prevention pillar. Further, the Network encourages referring to Article 7(4) of the ATT<sup>35</sup>, which commits States to assessing GBV risks as part of arms-transfer authorisation processes.

### WHRDs

*Para 47.* The Network recommends highlighting the various forms of repression faced by women human rights defenders, as detailed in the *Evolving Norms and Changing Directions* report<sup>36</sup>.

*Para 48.* The Network suggest cross-referencing to GR33, which discusses the importance of ensuring "that women human rights defenders are able to gain access to justice and receive protection from harassment, threats, retaliation and violence"<sup>37</sup>. For clear State

<sup>29</sup> International Foundation for Electoral Systems, *Gender-Sensitive Indicators for Early Warning of Violence and Conflict: A Global Framework*, (2021), at 11-20.

<sup>30</sup> UNIDIR, *Gendered Impacts of the Use of Explosive Weapons in Populated Areas*, (2024), [https://unidir.org/wp-content/uploads/2024/04/UNIDIR\\_Gendered\\_Impacts\\_of\\_the\\_Use\\_of\\_Explosive\\_Weapons\\_in\\_Populated\\_Areas.pdf](https://unidir.org/wp-content/uploads/2024/04/UNIDIR_Gendered_Impacts_of_the_Use_of_Explosive_Weapons_in_Populated_Areas.pdf)

<sup>31</sup> Ray Acheson, *Gender-Based Violence and the Arms Trade*, Global Responsibility to Protect, (2020), <https://doi.org/10.1163/1875984X-01202002>, at 142-147; Oxfam Novib, *supranote 18*, at 61-63.

<sup>32</sup> *Ibid.*; Dutch CEDAW Network, *Mind the Gap: Addressing Policy Gaps in Women's Rights*, (2024), para 8.

<sup>33</sup> CEDAW, *Concluding observations on the combined seventh and eighth periodic reports of Germany*, CEDAW/C/DEU/CO/7-8 (2017), [hereinafter CO Germany], para 28.; CEDAW, *Concluding observations on the eighth periodic report of Italy*, CEDAW/C/ITA/CO/8 (2024) [hereinafter CO Italy], para 18.

<sup>34</sup> CO Germany para. 28.

<sup>35</sup> Arms Trade Treaty art. 7(4), 3013 U.N.T.S. 269.

<sup>36</sup> CEDAW, *supranote 23*.

<sup>37</sup> GR33, para 15.

Obligations on the protection and empowerment of WHRD, the Network suggests referring to the COs for Congo<sup>38</sup> and Thailand<sup>39</sup>.

### **Conflict minerals and extractive industries**

*Para 52.* The Network highlights an opportunity to reference the connections between extractive industries, conflict, gender inequality, and child labour. It proposes mentioning that resource extraction is frequently a driver of conflict, and that it therefore has deeply gendered impacts. Further, we suggest mentioning that these industries continue to undermine women's rights and safety, as women and girls are forced to work under exploitative, hazardous conditions, as is highlighted in the COs for Congo<sup>40</sup>. Further, the Network proposes mentioning that extractive industries often rely on child labour, which exposes children to dangerous conditions, trafficking and sexual exploitation<sup>41</sup>.

*Para 53.* The Network proposes noting that the global supply chain of conflict minerals often lacks sufficient transparency, enabling exploitation and illicit trade. The *Evolving Norms and Changing Directions* report provides a useful accountability lens<sup>42</sup> when reading UNSCR 1820 alongside UNSCR 2467 and highlights frameworks such as the EU Corporate Sustainability Due Diligence Directive<sup>43</sup>, which requires companies to identify and address human rights and conflict-related risks, including gendered impacts. The Network also wonders whether this section could further emphasise the central role of local women's groups -including rural, Indigenous, and displaced women's organisations- in preventing harm, addressing inequalities, supporting affected communities, and advancing more sustainable economic models<sup>44</sup>. This aligns with GR34 and GR39, which underscore the need to ensure these groups' meaningful participation in the design and implementation of policies related to land, natural resources, and development<sup>45</sup>. The Network recommends referring to the Committee's COs for Sri Lanka on gender-sensitive disaster risk reduction<sup>46</sup>.

### **Food insecurity and starvation as warfare tactic**

*Para 57.* The Network wonders whether this section could further elaborate on the gendered impact of food insecurity and starvation. In many conflict-affected contexts, economic distress can lead families to adopt harmful coping strategies, including early and forced marriage, which heighten risks of GBV and perpetuate cycles of poverty<sup>47</sup>. The Network also proposes drawing attention to the cumulative impact of conflict on pre-existing gender inequalities, which exacerbates barriers that women and girls already face in peacetime and intensifies their caregiving burden, food insecurity, and reduced access to essential services<sup>48</sup>.

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<sup>38</sup>CO Congo1 para 43.

<sup>39</sup>CEDAW, *Concluding observations on the eighth periodic report of Thailand*, CEDAW/C/THA/CO/8, (2025), paras 33-34.

<sup>40</sup>Idem para 47.

<sup>41</sup>Wilson Center, *The DRC Mining Industry: Child Labor and Formalization of Small-Scale Mining*, (2020), <https://www.wilsoncenter.org/blog-post/drc-mining-industry-child-labor-and-formalization-small-scale-mining>.

<sup>42</sup>CEDAW, *supranote 23*, at 23.

<sup>43</sup>Idem at 27; Regulation (EU) 2017/821 of the European Parliament, 2017 O.J. (L 130) art. 3-4.

<sup>44</sup>Oxfam Novib, *supranote 18*, at 63 ; Sage Fund, *Building Power in Crisis: Women's Responses to Extractivism*, (2023), [https://static1.squarespace.com/static/56e04646f699bb070acdb6f3/t/64947b5da3709401a44eccdc/1687452512143/ExtractiveReport\\_Short\\_Eng\\_LoRes\\_Final\\_2.2.23.pdf](https://static1.squarespace.com/static/56e04646f699bb070acdb6f3/t/64947b5da3709401a44eccdc/1687452512143/ExtractiveReport_Short_Eng_LoRes_Final_2.2.23.pdf), at 12-20.

<sup>45</sup>GR34 para 35-36 & para 61.

<sup>46</sup>CEDAW, *Concluding observations on the ninth periodic report of Sri Lanka*, CEDAW/C/LKA/CO/9, (2025), para 60.

<sup>47</sup>CEDAW, *supranote 23*, at 27-28.

<sup>48</sup>Idem, at 29.



## Threats to reproductive rights and healthcare in armed conflict

*Para 67.* The Network suggests including in this paragraph that reproductive rights and health care are increasingly at risk due to armed conflict, the global rise of authoritarianism, and anti-rights movements. It proposes mentioning that states have an obligation to ensure women's equal access to comprehensive, quality, and non-discriminatory sexual and reproductive health services, as underlined by UNSCR 2106<sup>49</sup>. The Network recommends referring to the Committee's COs for Chile for State obligations<sup>50</sup>.

## Pandemics

*Para 69.* The Network encourages consideration of the potential rise in GBV, particularly domestic violence, during pandemics<sup>51</sup>.

## Technology and AI

*Para 77.* The Network highlights the importance of considering AI's impact on gender inequality. As underscored in *Evolving Norms and Changing Directions*, UNGA Resolution 77/193 points out that AI systems may amplify existing inequalities because of data limitations, design gaps, and historical biases<sup>52</sup>. For State recommendations, the Network proposes looking at the COs for Italy<sup>53</sup>.

## AI- Spawned online violence

*Para 80.* The Network proposes greater attention to the gendered risks posed by AI-generated online violence. It suggests explicitly mentioning that AI-fueled digital violence manifests as a form of SGBV, which is highlighted in the COs for Chile<sup>54</sup>. The Network encourages noting the gendered impacts of this, for example, by adding: *This threatens the safety and well-being of women, youth, and LGBTQIA+ people*<sup>55</sup>. *Technologies are not merely tools for abuse and harassment; they increasingly function as mechanisms that perpetuate harm, deepen suffering, and reinforce stigma against victims*<sup>56</sup>. In the COs for Chile, excellent State obligations can be found<sup>57</sup>.

## AI in warfare

*Para 85.* The Network commends the Committee's attention to the risk of algorithmic bias affecting marginalised groups and suggests a brief elaboration. For example, it could be acknowledged that AI-enabled weapon systems may reproduce or exacerbate gender discrimination, including against women, women of colour, and LGBTQ+ people<sup>58</sup>. Where meaningful human control and safeguards are insufficient, such biases could influence who is identified -or misidentified- as a threat or as a civilian requiring protection<sup>59</sup>.

## Climate Crisis

*Para 98.* The Network sees an opportunity to elaborate on GR37 and align the guidance in both GR30 and 37 by giving greater attention to the gendered vulnerabilities arising from

<sup>49</sup>Idem, at 33.

<sup>50</sup>CEDAW, *Concluding observations on the eighth periodic report of Chile*, CEDAW/C/CHL/CO/8 (2024) [hereinafter CO Chile], para 38.

<sup>51</sup> UN Women, *The Shadow Pandemic: Violence against women during COVID-19*, <https://www.unwomen.org/en/news/in-focus/in-focus-gender-equality-in-covid-19-response/violence-against-women-during-covid-19>.

<sup>52</sup>CEDAW, supranote 23.

<sup>53</sup>CO Italy para 26.

<sup>54</sup>CO Chile para 26.

<sup>55</sup>Close & Darwish, supranote 4, at 20.

<sup>56</sup>Nicola Henry, Asher Flynn & Anastasia Powell, *Technology-Facilitated Domestic and Sexual Violence: A Review*, Violence Against Women, (2020), <https://doi.org/10.1177/1077801219875821>, at 1846.

<sup>57</sup>CO Chile para 26.

<sup>58</sup>CEDAW, supranote 23.

<sup>59</sup>Idem at 61.

climate change. GR37 extensively details how women and girls are disproportionately affected by climate-related disasters<sup>60</sup> and how these impacts intersect with other forms of discrimination, including against displaced, Indigenous, and rural women<sup>61</sup>. The Network further proposes elaborating on the climate-induced risks of GBV, including *rape, sexual assault and harassment, intimate partner violence, child marriage, trafficking, and sexual exploitation*. In addition, we suggest emphasising how climate disasters increase the care burden on women and girls, as highlighted in GR37<sup>62</sup>, creating a vicious cycle that heightens vulnerability to future disasters. For strong examples of State obligations, the Network recommends referring to the COs for Congo<sup>63</sup> and Chile<sup>64</sup>.

*Para 99.* The Network suggests emphasising the importance of protecting women on the frontlines of environmental safeguarding and ensuring equal opportunities for their participation in climate governance<sup>65</sup>. GR37 further outlines mechanisms for holding States accountable for the disproportionate impacts of climate change on women and girls<sup>66</sup>

*Para 103.* The Network would welcome language acknowledging that militarisation fuels the climate crisis and intensifies gendered harms, and that gender-responsive approaches to reducing militarisation are an essential component of protecting women's rights in climate-affected contexts<sup>67</sup>.

## Reparations

*Para 113.* The Network wonders whether it would be appropriate to include (a gendered approach to) restorative justice as a complementary approach to reparations and transformative change in this section, particularly considering experiences with restorative justice in various countries, including the Truth and Reconciliation Commission in South Africa. This could be supported by cross-referencing to GR33<sup>68</sup>. Additionally, the COs for Italy highlight how such alternative processes can reinforce efforts to address GBV, while emphasising that they should complement, rather than take precedence over, formal justice mechanisms<sup>69</sup>.

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<sup>60</sup>GR37 paras 3-5.

<sup>61</sup>Idem paras 2.

<sup>62</sup>Idem para 62.

<sup>63</sup>CO Congo2 para. 42.

<sup>64</sup>CO Chile para 54.

<sup>65</sup>GR37 para 36.

<sup>66</sup>Idem para 38.

<sup>67</sup>WILPF, *10 Things You Need to Know about Demilitarisation for Climate Justice from an Intersectional Feminist Perspective*, (2023), <https://www.wilpf.org/10-things-you-need-to-know-about-demilitarisation-for-climate-justice-from-an-intersectional-feminist-perspective/>.

<sup>68</sup>GR33 para 37.

<sup>69</sup>CO Italy para 28.