Para 1
Split into 3 distinct points. The first as it is currently in the draft document, i.e., about GR 19. The second on Special rapporteurs with more elaboration particularly their work on state responsibility, the third on other treaty bodies.

Para 2
After the first sentence, the rest of the paragraph better be split into 2 sub paragraphs. The first on states parties, the sentence “The practice of States parties has endorsed the Committee’s interpretation for over 25 years” should be moved from Para 1 to begin this sub paragraph. It would be great to provide numbers on laws on GBV adopted, national policies created, etc. Second sub paragraph on “civil society, especially women’s non-governmental organizations, …… contributing to the recognition of this violence as a human rights violation and the adoption of laws and policies to address it”, and setting services for women victims/survivors in place.

Para 3
Since the adoption of General Recommendation No. 19 …………… condemn gender-based violence against women, in all its forms, wherever it occurs, and reject impunity for any party involved in its perpetuation.

Para 4
There is a need to provide a wider list of non-state actors, which should include not only armed groups, but also non-armed, ideological militias, international corporations, and international institutions including UN staff in some circumstances.

"In addition, in some States parties there has been erosion of legal and policy frameworks to address equality of women with men and non-discrimination on the basis of sex and gender, sometimes as a result of shrinking democratic political spaces and reduction in public spending or justified in the name of tradition, religion or fundamentalist ideologies. That erosion allows for the pervasiveness and increase of gender-based violence against women and the increasing culture of impunity."

Para 9
- A new para (9-2) to get into in-depth definition of psychological violence – building on the work of SRs is needed to cover a gap that is currently present at both political and legal levels, leading to inadequacy in implementing them in practice.

- Ethnic factors should be included as it really impacts GBV. Order of factors, cultural, political, social and economic
- *Economic harm* should be emphasized in the impact of GBV and as reinforcing. (Let us keep the definition we have in the GR 19, Declaration on VAW, and the work of SRs).

**Para 11**
The Committee considers that gender-based violence against women is *one of* the fundamental social, political and economic mechanisms by which the subordinate position of women with respect to men and their stereotyped roles are perpetuated (otherwise there could be an impression that GBV is the only, not is one of many, mechanisms)

**Para 12**
1. The paragraph should separate the duties of state actors and non-state actors in order to address obligations which remain relevant to the emerging context and forms of gender-based violence against women.
2. With regards to new technologies and social media, the *phrasing* of legal aspects is critical so that it is not used by states to restrict freedom of expression of activists on cyberspace.

**15. Recommendations’**

**Protection and redress**

ii. Providing appropriate protection to prevent further or potential violence.

Add another sentence

*Providing emergency contraceptives, DNA tests and psychological counseling to victims of sexual assaults in hospitals and forensic offices*

Add new paragraph e) provide gender sensitivity training to staff of all services interacting with women: shelters, police stations, forensic medicine doctors, hospitals, ....