The Women’s Environment and Development Organization (WEDO) welcomes this opportunity to present a submission to the United Nations Committee on the Elimination of Discrimination Against Women, on draft General Recommendation 35, on the Gender-Related Dimensions of Disaster Risk Reduction in a Changing Climate. WEDO appreciates the Committee’s development of this valuable recommendation, recognizing the urgent nature of climate change, its relation to disaster risk reduction and the impacts on the human rights of women and girls.

Comments on the scope of the General Recommendations
WEDO is disappointed to see the scope of the draft has been scaled back to focus on “dimensions of DRR in a changing climate”. WEDO would like to see a return to clear focus on disaster risk reduction and climate change. The urgency of climate change cannot be overstated, neither can the negative and differentiated impacts of climate change on women and marginalized communities. Recent landmark agreements, the Paris Agreement, the Sendai Framework and the 2030 Agenda for Sustainable Development, as well as the New Urban Agenda, are all in early phases of implementation and the draft clearly recognizes the need to develop synergies and ensure policy coherence.

States parties need guidance from CEDAW to address the interlinkages and ensure full compliance with their obligations to respect, protect and fulfil women’s human rights in the context of both disaster and climate change. This is the time to do it and explicitly address prevention. A future General Recommendation may unfortunately come too late, given the time required for drafting and adoption.

In particular, WEDO would like to see clear elaboration of the obligations of States parties to take effective measures to mitigate climate change, addressing the root causes of climate change, which not only lead to slow and rapid onset climate-related disasters, but also directly and indirectly impede gender equality. These include unsustainable patterns of production and consumption that fuel profits while ignoring social and environmental costs. The result is increasing greenhouse gas emissions caused by human action (and inaction) and impacts that it may not be possible to adapt to.

Specific text recommendations for Section II.
9. This General Recommendation will provide guidance to States parties on the implementation of their obligations under the Convention on the Elimination of All Forms of Discrimination against Women in the context of disaster risk reduction in a changing and climate change. In their reporting to the Committee, States parties should address general obligations to take urgent action to mitigate climate change and reduce greenhouse gas emissions, including addressing root causes of climate change; ensure substantive equality between women and men in all areas of life, as well as specific guarantees in relation to those Convention rights that may be particularly affected by climate-related disasters such as extreme weather events and slow-onset phenomena including droughts and sea level rise. The objective of the Recommendation is to highlight the steps that need to be taken to prevent climate
change and its causes and achieve gender equality as a factor that will reinforce the resilience of individuals and communities in the context of climate-related disasters. The General Recommendation further seeks to improve coherence, accountability and the mutual reinforcement of different international agendas on disaster risk reduction, climate change, sustainable development and human rights, in particular women’s human rights.

10. The General Recommendation does not cover the gender-related dimensions of climate change adaptation and mitigation in general. It focuses on the obligations of States parties and other stakeholders under the Convention to take effective measures to mitigate and adapt to climate change in order to prevent, and anticipate and respond to the new hazards and disaster risks that have emerged as a result of climate change and on the need to develop synergies between gender equality, disaster risk reduction, climate management and sustainable development efforts...

Comments on Section IV and Section V
Section IV of the draft importantly highlights precarious and informal employment, gendered division of labour, the increased care burden of women after disasters and inadequate social protection systems that negatively impact women’s access to education and other resources. The steps outlined are commendable. One concept that should be integrated in this section of the draft is that of a ‘just transition’, which is a concept from the trade unions to address the move from polluting fossil fuel industries to renewable energy/no carbon economies and its impact on workers (recognized in the Paris Agreement). The idea is expanding to just and equitable transitions for all, including women and marginalized groups, recognizing especially that women face structural barriers to decent work that mirror the barriers that affect women’s ability to respond and be resilient to climate change. These include wage inequality, discrimination, low-wage/low-status jobs for women, burden of unpaid care work, and lack of access to health, education and other public services.

The draft could provide further guidance in paragraph 25 in how to promote decent work in the frame of just transitions for women in under-valued fields such as care work; the (social) service sector; sustainable, locally-focused agriculture and fisheries; as well as locally governed renewable energies with women participating equally as shareholders, owners and fairly-remunerated workers.

Section V. E addresses technology and misses that technology in a climate change context is also an opportunity for women, including indigenous women, to contribute knowledge and expertise and build their capacity in development of appropriate technologies.

Section VI. E on Sustainable Urban Development would benefit from recognition of the importance of sustainable gender-responsive infrastructure, as well as accessible, affordable, public transport systems.

1 Obligations should be reserved for States parties or recognized duty bearers, not general stakeholders that may include rightsholders.