



**AFFILIATION OF AUSTRALIAN  
WOMEN'S ACTION ALLIANCES  
(AAWAA)**

Women's Action Alliance Canberra (WAAC)  
Women's Action Alliance Tasmania (WAAT)  
Queensland Women's Action Alliance (QWAA)  
South Australian Women's Action Alliance (SAWAA)  
Western Australian Women's Action Alliance (WAWAA)  
Women's Action Alliance Victoria (WAAV)



**A new International Gender Equality Strategy for the  
Department of Foreign Affairs and Trade**

**Submission**

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## INTRODUCTION

The Affiliation of Australian Women's Action Alliances (AAWAA) brings together women's liberation groups from the ACT, Tasmania, Queensland, South Australia, Western Australia, and Victoria, all of whom contributed to and endorsed this submission. We advocate for the advancement and protection of women and girls in all domains but especially where we face discrimination or are vulnerable by reason of our sex. Our groups are not aligned with any political party or parties.

AAWAA notes and commends DFAT's recent initiatives to empower women and girls including the inaugural Pacific Islands Forum Women Leaders Meeting and Australia's Investing in Women program to improve women's economic participation in Southeast Asia. These programs will, in time, generate direct and indirect benefits to regional development and stability.

AAWAA also notes and commends DFAT's initiative to support sanctions against abuses of the human rights of women and girls including in Iran and Afghanistan. Sanctions alone will not bring change, but they provide validation to the women who are fighting these oppressive regimes.

AAWAA hopes that the achievements of these initiatives will strengthen DFAT's case for increased funding for development assistance. We firmly believe that policies to emancipate and empower women and girls are not only a matter of moral imperative but also a strategic investment that promises substantial returns in the form of enhanced economic growth and regional stability.

AAWAA welcomes DFAT's decision to develop a new international gender inequality strategy and trusts that it signals greater ambition. We offer the following recommendations in good faith and a constructive spirit. Thank you for the opportunity to comment.

### A. RE-PRIORITISING AND RE-FOCUSING AUSTRALIA'S INTERNATIONAL GENDER EQUALITY STRATEGY

It is deeply troubling that even now – halfway through the target timeline for achieving the Sustainable Development Goals (SDGs) – we do not have sufficient data to measure progress towards gender equality (SDG5) in our region.<sup>1</sup> Anecdotal evidence suggests some wins for women in leadership roles in a few select countries but that violence against women and girls remains at epidemic levels. Additionally, health and educational outcomes for women and girls continue to lag despite years of consistent policy effort.

Against this background, AAWAA advocates for a refocused strategy within DFAT, both in its rhetoric and in its practical implementation, with a clear emphasis on addressing the unique needs of women and girls. We support commitments such as those set out in the 2016 Strategy to ensure Australia's development investments address gender issues in their implementation, but we believe a lack of real progress demands that we dedicate a much greater proportion of our aid budget to specific outcomes for women and girls. The challenge certainly demands more than the \$65 million annual expenditure that is set aside for the gender equality fund.<sup>2</sup>

A larger gender equality fund must in turn re-prioritise practical measures to address male violence against women and girls. One lesson of the pandemic – and increasingly of climate change – is that these societal stressors are increasing the prevalence of violence against

<sup>1</sup> [Asia and the Pacific SDG progress report 2023](#), UNESCAP, accessed September 2023

<sup>2</sup> [Australia's international support for gender equality](#), DFAT, accessed September 2023

women, while worthy efforts to engage women in the pursuit of peace and security (as in the Security Council's landmark resolution on Women, Peace and Security)<sup>3</sup> will be ineffectual without concomitant practical programs to address violence against women.

At the same time, promoting sexual and reproductive health and ending reproductive exploitation must remain a priority. It is imperative that DFAT redouble commitments to programs and policies that prioritise women's access to comprehensive healthcare, including family planning, maternal care, and sexual health services. This involves removing barriers to reproductive choice, ensuring safe access to abortion while addressing the practice of sex-selective abortions, and upholding women's right to female carers.

AAWAA also advocates for the inclusion of comprehensive sex education, including discussions about consent, integrated into educational curricula for both boys and girls. This should also leverage appropriate media to maximise its effectiveness. Australia must also continue its leadership of multilateral efforts to address human trafficking with an emphasis on sexual servitude and enslavement. AAWAA would also like to see the Australian Government take a leadership role in establishing extraterritorial laws to address exploitative commercial surrogacy.

Finally, AAWAA would like to see Australia – through DFAT – lead a renewed campaign to address the issue of gender-stereotyping in all domains of policy. DFAT has achieved much to address rigid sex-based stereotypes, including through programs to support women leaders and decision-makers, and in prioritising women and girls for educational opportunities, especially in STEM. At the same time, efforts to support financial measures to help women counter economic disadvantage have had the corollary benefit of discrediting harmful stereotypes about women in business.

AAWAA assesses that these disparate initiatives would be significantly more effective if they were consolidated under an overarching framework aimed at addressing gender stereotyping, as set out in Article 5 of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).<sup>4</sup> Such an approach would not only serve as a model for others to follow but also inspire approaches to reduce stereotyping in other domains.

AAWAA would especially like to see DFAT do more to uphold specific obligations regarding gender-stereotyping in education (CEDAW article 10c), where contested ideas of 'gender' (as an innate feeling manifest in, for example, clothing preferences and submissive behaviours) risk reinforcing discredited cultural stereotypes that have historically held women and girls back.

## **B. CLARITY AND ACCURACY IN LANGUAGE**

### **The importance of sex-specific language**

AAWAA is concerned that efforts to address stereotyping have prompted misguided calls to degender *all* language and not just where stereotypes are implied as in matters of power or authority (such as in the word 'chairman'). But calls to degender *all* language in fact exacerbate discrimination against women, especially where new usages impede clear communication, in matters of health for example.<sup>5</sup>

<sup>3</sup> [Landmark resolution on women, peace and security](#), UNSCR 132, accessed September 2023

<sup>4</sup> [Convention on the Elimination of All Forms of Discrimination Against Women](#), United Nations

<sup>5</sup> [Effective Communication About Pregnancy, Birth, Lactation, Breastfeeding and Newborn Care: The Importance of Sexed Language](#), *Frontiers in Global Women's Health*, Volume 3, 2022

AAWAA is also concerned about efforts in the United Nations to refashion language to efface women.<sup>6</sup> We look to DFAT's leadership to push back against these efforts and make the case for linguistic clarity and accuracy. We note in this context that arguments for erasing linguistic distinctions between men and women is the practical application of queer theory that emerged in Western universities, and its imposition on others carries strong undertones of cultural imperialism.

### C. RISKS TO AN AUSTRALIAN GENDER EQUALITY STRATEGY

#### Conflating support for women and girls and persons of 'diverse gender identities'

AAWAA is concerned that Australia's and international efforts to address stereotyping have also been confused and constrained by well-intentioned but misguided efforts to promote 'diverse gender identities' within the same policy context.

AAWAA supports Australia's and international efforts to ensure protections against violence and discrimination based on sexual orientation and gender identity (SOGI), and commends Australia's role as a 'friend of the SOGI mandate.' But the promotion of gender equality and the protection of persons of 'diverse genders' are two very different issues, relying on two very different meanings of the word gender, and calling for two very different policy responses.

When these issues are juxtaposed in the same policy context, it suggests either a lack of understanding – or a rejection from an ideological point of view – of the fact the essential challenges facing women and girls stem from inherent biological differences from men and the social roles and stereotypes that arise from these differences.<sup>7</sup> Yet to Australia's credit, our policies at the regional level in support of reproductive health, including issues of menstruation and menopause, demonstrate that we do understand this reality. Unfortunately the confusion created by the juxtaposition of these two issues in other forums serves to belittle Australia's commitment to gender equality and to improving the material conditions of women and girls.

We see this confusion in DFAT's call for submissions for developing this new international gender equality strategy. The 'easy read' version of the call provides the following to explain the meaning of gender: "People say what gender they are. They might be a man, a woman, a different gender, no gender."<sup>8</sup> We hope that this is not to suggest that the women in Iran and Afghanistan face oppression because they choose to define themselves as women – as such oppression stems from the reality of their sex.

AAWAA urges clear and consistent use of the word gender in the context of gender equality, noting accepted and common sense usage. In this regard, we note CEDAW's clear definition of discrimination against women as:

any distinction, exclusion or restriction made **on the basis of sex** which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women, irrespective of their marital status, on a basis of **equality of men and**

<sup>6</sup> See [Statement on 'Report on Gender Theory' by Independent Expert Madrigal-Borloz for the United Nations Office for the High Commissioner for Human Rights \(OHCHR\)](#), Women's Declaration International, 4 May 2022

<sup>7</sup> On the importance and meaning of "biological differences resulting in hierarchical relationships between women and men and the distribution of power and rights favouring men and disadvantaging women," see [General recommendation No. 28 on the core obligations of States parties under article 2 of the Convention on the Elimination of All Forms of Discrimination against Women](#)

<sup>8</sup> [New International Gender Equality Strategy, 'easy read' version](#), DFAT

**women**, of human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field.<sup>9</sup> [emphasis added]

To eliminate confusion in our policies, AAWAA assesses a more effective title for Australia's new international gender equality strategy would be simply 'Australia's International Strategy for Women and Girls.' Such a renaming should not be interpreted as a reduction in our commitment to our SOGI (sexual orientation and gender identity) goals but instead a sharpened clarity of purpose for both objectives.<sup>10</sup>

### **Self-identification in the developing world**

AAWAA is concerned that the promotion of the rights of 'persons of diverse gender identities' in the context of gender equality conveys support – whether intended or not – for self-identification laws in our region and beyond. These laws grant legal rights to males who self-identify as women (usually through a simple administrative process) to access protected spaces, gatherings, grants, and services, previously reserved for women and girls. AAWAA has reservations about self-identification laws in Australia because of the scope they provide for abuse – despite the existence of other laws and programs (for example, concerning consent) designed to protect women's rights to safety, dignity, privacy, and sexual autonomy. But self-identification laws in countries with much weaker legal safeguards and societal norms of male entitlement to women's bodies would be disastrous – and would, we believe, be rightly rejected by women in these countries.

In practical terms, self-ID without a range of robust safeguards would undermine, among other things, the good work of many Australian and international charities building single-sex toilets in schools in developing countries without which many girls would be at risk of sexual assault and likely to drop out of school.

### **The 'Yogyakarta Principles'**

AAWAA is concerned about efforts in some quarters to promote the 'Yogyakarta Principles' as an international human rights standard. These principles call on states to remove all barriers to self-ID including by ending the practice of registering sex on legal documents, such as birth certificates. Implementing these principles would have severe consequences, making it impossible to carry out 'special measures' to address female disadvantage – as required under CEDAW – along with efforts to collect meaningful statistics to monitor and evaluate progress. The Yogyakarta Principles have no standing in Australian or international law. It should also be noted that they were negotiated by activists, including at least one who has since recognised that the negotiators failed to consider the implications of the principles for the rights of women.<sup>11</sup>

<sup>9</sup> [Convention on the Elimination of All Forms of Discrimination Against Women](#), United Nations

See also usage by [UN Women's Gender equality glossary](#):

Gender refers to the roles, behaviors, activities, and attributes that a given society at a given time considers appropriate for men and women. In addition to the social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, gender also refers to the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialization processes. They are context/time-specific and changeable. Gender determines what is expected, allowed and valued in a woman or a man in a given context.

<sup>10</sup> In functional terms, we would also recommend that the Ambassador for Gender Equality resume the title of Ambassador for Women and Girls and our Ambassador for Human Rights take coverage of the SOGI matters.

<sup>11</sup> Robin Singer, [The man who suddenly heard women - and renounced the Yogyakarta Principles](#); Hannah Harrison, [Yogyakarta Principles: International Threat to Women's Rights](#)

We look to DFAT to correct the inappropriate promotion of the Yogyakarta Principles both in international and regional organisations and if necessary with other agencies and governments within Australia. A failure to do so could compromise any future gender equality strategy.

### **Safeguarding children**

AAWAA also calls on DFAT to be mindful of the risk that short-hand messaging to advocate for human rights protections against violence and discrimination based on sexual orientation and gender identity do not serve to legitimate unproven and risky medical treatment for children and young people in the name of their ‘gender identities.’

The risk arises because advocates have extended the very legitimate and important aim of eliminating violence and discrimination against adults who have freely chosen a ‘gender identity’ to apply the concept of ‘gender identity’ to children and with it the notion that states have an obligation to provide these children with unproven and risky medical treatments to ‘affirm’ a gender identity.<sup>12</sup>

This is despite a growing body of expert opinion – and a view accepted by a growing number of countries<sup>13</sup> – that the evidence base for these medical interventions is poor, that interventions carry significant risk for a young person’s future well-being and that some transgender identities in young people have subsequently proven mistaken especially among children who were simply same-sex attracted.<sup>14</sup> AAWAA raises these concerns in the

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<sup>12</sup> [Are children mature enough to decide their gender identity?](#), Victor Madrigal-Borloz, UN Independent Expert on Protection against violence and discrimination based on sexual orientation and gender identity.

We understand the Expert is scheduled to address the UNHCR later this month on the ‘rights of the child and inclusive social protection.’ For our part, we believe strongly that the the absence of a strong evidence base for the benefits of the paediatric gender medicine or the so-called ‘affirmation model of care,’ including the use of drugs that have not received formal approval, along with known adverse risks associated with their use, puts some UN members in breach of the [UN Convention on the Rights of the Child](#), including the obligation to protect children from injury and negligent treatment and to provide them with the highest attainable standard of health. The unproven and questionable narrative that transgender or gender dysphoric children are at elevated risk of suicide if they are not affirmed also compromises their capacity to provide informed consent. As such, it potentially breaches children’s right to protection from medical experimentation ‘without consent freely given’ – a right that is central to many human rights conventions. For further information see [Submission to the UN for the rights of the child and inclusive social protection](#), LGB Alliance Australia.

<sup>13</sup> See [Medical treatment methods for dysphoria associated with variations in the gender identity of minors](#), Council for Choices in Health Care in Finland (COHERE Finland); [Patient safety for children and young people with gender incongruence](#), Norwegian Healthcare Investigation Board; [Care of children and adolescents with gender dysphoria](#), National Board of Health and Welfare, Sweden; [Interim report of the Cass Review of the Gender Identity Development Service \(GIDS\) at the Tavistock and Portman NHS Foundation Trust](#), United Kingdom; [Medicine and gender transidentity in children and adolescents](#), Académie nationale de médecine, France.

<sup>14</sup> [The evidence to support medicalised gender transitions in adolescents is worryingly weak](#), *The Economist*, 5 April 2023



context of gender equality because girls have come to dominate presentations at gender clinics in the Global North<sup>15</sup> – a trend we fear may be repeated in the Global South.<sup>16</sup>

## CONCLUSION

AAWAA extends our gratitude in advance to DFAT for your consideration of these important issues. Should you require further clarification on our submission, we are readily available to provide additional details. We eagerly await the progress of the development of a new international strategy for gender equality and extend our best wishes for your success in this vital undertaking.

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<sup>15</sup> See [Sharp increase in incidence of gender dysphoria in children and young people](#), Society for Evidence Based Gender Medicine

<sup>16</sup> In this regard we are troubled by a campaign by UNAIDS in India to to promote the concept of a transgender child, see [UNAIDS launches Unbox Me to advocate for the rights of transgender children](#); see also, [Inventing the Indian 'Transgender Child'. Instead of focusing on AIDS prevention, why is UNAIDS turning prepubescent, nonconforming children into 'trans'?](#), Vaishnavi Sundar, May 2022



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