

Dear members of CEDAW Committee,

Greetings from Beirut,

In response to your call for comments on the updated version of General Recommendation no. 19 on violence against women that was drafted by the Committee on the Convention against All Forms of Discrimination against Women, please find enclosed our contribution to this process.

A coalition from Lebanon is making this joint submission in response to this call, which was communicated by the Regional Office of the Office of the High Commissioner for Human Rights in Middle East and Northern Africa to a wide group of civil society actors in Lebanon. The coalition is composed of Lebanese, Palestinian and Syrian NGOs working on the issues of women's rights and gender equality.

The participating NGOs commend the efforts and urge the committee to give attention to the particular challenges that affect women in the Arab region considering the overall political, economic, social and cultural conditions that hinder the achievement of equality and elimination of violence.

The coalition members wish that the Committee would take the observations into account in order to urge the states to meet their obligations and to activate efforts to abolish all forms of gender-based violence against women and girls.

The coalition prepared set of general observations and then added few comments directly on the draft. The following NGOs have contributed to this submission:

1. Abaad- Resource Center for Gender Equality
2. Arab NGO Network for Development
3. Collective for Research and Training on Development-Action
4. Fe-male
5. Justice without Frontiers
6. Kafa- (Enough) Violence and Exploitation
7. Lebanon support
8. Lebanese Women Democratic Gathering
9. Lebanese Council to Resist Violence against Women
10. Musawa \ Women's Studies Center
11. Association Najdeh
12. Syrian feminist lobby
13. Syrian league for citizenship
14. Syrian Women's League

Best regards,

On behalf of the coalition

The Lebanese Women Democratic Gathering

Beirut, September 29, 2016

General observations on the text:

The participating NGOs in drafting observations on supplement of General recommendation No. 19 have agreed on the following comments:

- To unify the term of gender-based violence against women and girls, and to give more attention for the Arabic translation by the United Nations.
- To stress more on linking the global context in relevance to implications of armed conflicts related-crises on women.
- To remark the growing aspects of religious fundamentalism, extremism and violence phenomenon.
- To remark all international resolutions whether issued by Security Council or general assembly on violence against women and to link them to CEDAW and general recommendation no. 19.
- To emphasis on the specificities of violence that is occurring during conflicts; not because of increased violations but due to arising forms of violence (stoning, captivity, group harassment, forced marriage and human trafficking against women and girls...)
- To encourage states to abide by Vienna Convention on the law of treaties.
- To encourage the states to ratify the optional protocol to CEDAW.
- To highlight the urge to review the operational mechanism of the protocol and the need to expand in clarifying the concept of exhaustion of local appeal processes.
- To confirm that protection include women are girls.
- To emphasize on clarifying that protection include all women and girls living in the territories of the state that ratified the convention.

Particular observations

- To expand more on the link between violence and discrimination on Paragraph 1
- Paragraph 2 : The adoption of the specific regional human rights conventions That don't inconsistent with international human rights conventions issued by the United Nations.
- To link on Paragraph 4 the prevalence of violence against women, lack of democracy and growth of terrorism, wars and conflicts and its implications on women and girls with the emergence of new types of violence.
- To include a specific paragraph around violence against women refugees on Paragraph 7
- to divide paragraph number 9 into two parts; the first related to causes and the second to effects.
- to add on paragraph 10 the impact of violence on reproducing roles with inequality and with dominance of power
- To include on paragraph 11 women housewives, rural women, girls children, divorced women, widows, elderly women, women with disabilities, women with chronic diseases, psychotic, sex workers, domestic workers, women prisoners, displaced women, migrant women, women belonging to limited ethnic or religious groups and women refugee
- To clarify what meant by the private sector
- To add a paragraph on non-governmental actors and state's responsibility for acts committed by those during armed conflicts To add a paragraph on non-governmental actors and state's responsibility for acts committed by those during armed conflicts
- **At the legislative level** , To ensure applying the concept of dominance of International law on the national law and To encourage states to include the constitutions an article that criminalizes violence against women
- **At the executive level** To encourage states to establish a ministry or special committee for women in order to set policies and strategies.
- **AT the judicial level** To Encourage states to apply the international law in pleadings, legal provisions and judgments , Train judges on gender approach and to adopt mechanisms that facilitate women's access to justice.
- To divide the paragraph on prevention into several parts under the following subtitles:

* Legislation

*Measures and procedures

*Strategies and policies

- To add the following suggestions on procedures:
 - *engage media in advocating women's issues.
 - * take firm procedures that ensures respect to women in media and not using them as sexual tools.
- To add the following on Legislative measures:
 - *Cancel all discriminatory laws against women and girls.
 - *Encourage states those who ratified ILO conventions.
 - * Adopt legislative measures for protection from sexual violence.
 - *Integrate international resolutions on peace and security in the national laws.
 - *Enact competent laws to protect women with terms and concepts that are founded by feminist movements and not with neutral-gender terms.
 - *Repeal Legislation that justifies mitigating reasons for the perpetrators of gender-based violence against women

- To add the following on Protection and redress
The States parties should establish special services for domestic violence victims, rape, incest, sexual abuse and other forms of gender-based violence, and support provisions that are provided by non-governmental organizations through:

- 1- Financial and security support for shelters equipped with professional staff.
- 2- Provide special training for health and social workers that responds to needs of women victims/ at risk of violence.
- 3- Rehabilitate and support victims.
- 4- Provide legal consultancy for women and their family members.
- 5- Tailor special programs that are aiming at rehabilitating perpetrators of domestic violence.
- 6- The state parties should create and circulate reporting mechanisms to allow women, and workers in social, health, educational, and legal sectors to report on cases of violence or at risk.
- 7- The states parties should facilitate women's access to provisions provided for victims of violence and should also allocate special services for women with low privileges.
- 8- The states parties should take legal procedures that ensure providing women victims of violence moral and financial compensations (public apologies, open trial etc...)
- 9- The judiciary in the states parties should pay extra attention in order to achieve justice with regard to the perpetrators of violence; particularly in not resorting to mitigating reasons -cultural believes such as blaming women victims, or looking into real reasons like tendency to tolerate violence perpetrators / sole breadwinner for his family
- 10- To increase penalties for crimes of sexual violence and trafficking in women and girls

- To add the following on Data collection and monitoring
 - 1- The states parties should include violence against women a constant section in comprehensive or representative statistics implemented by the central government unit; that would allow to collect data and researches on real number of gender based violence against women cases and to identify all forms, reasons and effects on victims and in general. This would allow to take concrete preventive and protective procedures and accordingly to measure the efficiency of the adopted procedures in tackling the issue.
 - 2- The states parties should develop mechanisms that would allow a central office to receive data from different institutions; and to facilitate for other actors on gender-based violence issue to access such data to help them conduct researches aiming at drawing concrete strategies and policies on the proposed issue.
 - 3- The states parties should put more efforts to obtain information about the illegal practices happening on its territories such as (abortion and its implications on women, sex buying, sex work and measures taken to deal with the consequences...)
 - 4- The state parties should support qualitative researches that would allow to explore norms, attitudes and practices against women and show kinds of violence that cause them; particularly those under taboo cultural reservations such as: Incest, marital rape, harassment at workplace, sexual harassment in public areas ...
 - 5- The state parties should make special effort on including women with low privileges in collecting data around violence, identifying risks that make them more exposed to violence, and providing special services for this segment with different needs.
 - 6- The state parties should support studies and researches on sexual violence against women and girls.