# Comments on the First Draft of the Voluntary Guidelines on GEWE CSM Women's Working Group 18 February 2022

The Civil Society and Indigenous Peoples Mechanism (CSM) would like to thank the work that has been done in gathering all the inputs from the Regional Consultations and the electronic global consultation, and in drafting this document in an attempt to jointly build voluntary guidelines that can lead towards policy guidance for gender equality and women and girls' rights within food systems. We welcome this improved first draft and we hope that the vision, demands, and expectations coming from the regional consultations is respected and taken into account towards the next steps. We recognize and value the global scope of the Guidelines, which needs to pay particular attention to the Global South, as part of the world who is still affected by historic oppression and neo-colonialism.

The right to food of women and girls must be realized and upheld because they are human beings. We believe it is crucial to overcome essentialist approaches to generate concrete changes in peoples' lives. Many justifications are offered in terms of women being important in and for families, for children, for the economy, food systems, etc. But women and girls' rights are essential in and for themselves rather than being contingent on something else. Their rights are too often unrecognised, unfulfilled, violated, and not respected.

The recognition, protection, and fulfilment of LGBQTI persons' rights is also crucial to ensure the progressive realisation of the right to food to all and to overcome gender disparities and power imbalances at all social and institutional levels. It is also crucial to ensure sustainable, fair, and healthy food systems. CFS vision is clear and calls its members and participants to name the discrimination and rightsholders in all their diversity, to identify the obstacles to be removed to achieve its mandate.

## **OVERALL FRAMING REMARKS**

The CSM emphasizes once more that a **genuine and solid Human Rights framework will result in truly transformative guidelines.** We welcome the advancements made in the document, particularly regarding references made to international agreed documents (see section "references in the first draft") and the commitment to the Human Rights and the Realization of the Right to Adequate Food (paragraph 19). We also believe that **references to sexual and reproductive health rights should be kept** (paragraph 5) in the final negotiated document, although these references need to be broader and not just directed to "maternal health" but rather "health" in general. This will avoid the Guidelines to fall into the patriarchal paradigm.

However, some sections of the document still need to be strengthened in order to address some of the issues and challenges, as well as policies and strategic approaches from a human rights perspective rather than from a technical top-down "fix". This is particularly the case for section 3.7 on **control and access over land and other natural resources,** where a more thorough analysis should be made on women's right to land rather than a focus on property rights, recognizing the root causes of dispossession and inequalities when it comes to access and control over land. In this sense, ongoing history of systemic and institutional racism, oppression of women and Indigenous Peoples, and violation of environmental rights should be also acknowledged. As we had previously noted, and wish to reiterate here, it should be recognised that the current dominant industrial model of agriculture is a major driver of land grabs and resource degradation, particularly impacting and resulting in landlessness. In general, the analysis on environmental and economic impacts of industrial agriculture remains lacking.

The discussion on land and resource grabbing as a structural impediment to women's land rights is very limited and fails to account for the responsibility of governments and corporations, which often are the same ones underpinning the global agro-industrial food system. In relation to this, the Guidelines should consider including States' duty to conduct human rights impact assessments of trade and investment agreements in accordance with the guiding principles developed by the Special Rapporteur on the right to food in 2011.<sup>1</sup>

Sections that refer to employment and work - being paid or unpaid, formal, or informal, recognized or unrecognized - should be further strengthened.

First, **decent work should be reflected based on its 5 pillars:** fair employment and income, social protection, social security, and the right to organize. Paragraph 7 should touch upon women's access to equal pay, living wages and safe workplace conditions. Women workers also have the right to full accurate information about their employment conditions, hazards, risks, etc (paragraph 60).

Moreover, the informal sector must be recognised. More women are employed in the informal sector than the formal one, especially with regards to small-scale food provision, agriculture, fisheries, and pastoralism (paragraph 59). The Guidelines should acknowledge the importance of the informal sector in small scale production and exchange and recognize that women rights in this sector should be protected, respected, and fulfilled. On this point consistency could be improved in the document by linking this issue with the social protection section.

Further, and importantly, focusing more broadly on women and LGBQTI persons' legitimate tenure rights rather than on property rights shall further reveal how the discrimination and inequality that women and LGBQTI persons experience arises not only from discriminatory laws, policies and customs relating to land ownership, but even more so from deliberate acts of land- and resource-grabbing by States and corporations, as well as broader neoliberal globalisation policies. Moreover, policies and strategic approaches in the first draft of the Guidelines may also include recommendations to the effect of advising Governments against certain acts, accounting for cases in which governmental institutions are directly liable, complicit, or wilfully negligent in relation to violations of women's rights. This is particularly striking for instance in para. 92 (iii), which calls on Governments to "ensure the provision of legal support to enable farmers to fight these practices [of land grabbing]." The statement seems rather naïve as it has been documented in many instances that government institutions themselves facilitate and incentivise land grabbing in the name of economic growth. It should be Governments' duty to protect farmers' (and women's) right to land rather than merely providing support to "fight these practices."<sup>2</sup>

The Guidelines assume that the path towards women equality and empowerment in food systems goes through their incorporation in value chains and in formal labour markets. The Guidelines should recognise the existing diversity of food systems. Women, girls, and LGBQTI people produce,

<sup>&</sup>lt;sup>1</sup> United Nations, Human Rights Council, Report of the Special Rapporteur on the right to food, Olivier De Schutter, Guiding principles on human rights impact assessments of trade and investment agreements, A/HRC/19/59/Add.5. (19 December 2011).

<sup>&</sup>lt;sup>2</sup> The CFS may refer to the concurrently in-process draft General Comment No. 26 on land and economic, social and cultural rights by the CESCR, which employs such terms as "States should refrain from any infringement of legitimate tenure rights" and "States should refrain from entering into international agreements with other States or international finance institutions that protect those institutions and corporations from liability or provide them with immunity from activities that endanger Covenant rights," among others.

sell and exchange food through territorial markets and local economies. Their crucial work should be acknowledged, and their rights should be protected, without adversely incorporating them into global value chains.

For the CSM organisations, agroecology is at the heart of our daily work, lives and our vision of a fair, sustainable food system centred on the realisation of human rights. This is particularly the case for women. Agroecology seeks to achieve a more just system, therefore its implementation can deconstruct and render all forms of injustice more visible, including the inequalities that women and LGBQTI persons face and suffer. It is not enough to simply include them in the implementation of actions: if the process is to be truly inclusive, women and LGBQTI persons need to be there from the outset, designing them. It is not about increasing their options within the recognized economy, but rather about generating a new economy where productive and reproductive work is made visible and shared. The much-needed transition to locally based, diverse, environmentally sustainable and climate resilient approaches is realized through the implementation of agroecology, as demonstrated by numerous case studies.<sup>3</sup>

We recognize the efforts made in including references to agroecological approaches. However, as CSM, we still believe that the CFS has not been able to adequately differentiate agroecology from diametrically opposed approaches, which are far from the transformation needed towards just and equitable food systems. Agroecology continues to be highlighted as an approach while it should be recognized as a model, without systematic reference to "other innovative approaches". As CSM, we will continue to push for an adequate recognition of agroecology as the true pathway for the urgent transformation needed, without conflating it with "other innovative approaches". Furthermore, we still can see more space for such references, for instance in paragraphs 92, 93 and 128viii.

Moreover, in order to achieve a fair and equal society where women and girls can fully enjoy their rights, we must put at the centre the alternative model of consumption and production that ensures women and girls rights, recognize their central role and that it is **founded on the food sovereignty paradigm**. Food sovereignty is the horizon and the key political demand coming from the communities. It is about people deciding what they eat, what they produce and how they produce it. We want to emphasize the importance of including the concept of food sovereignty in the document, which is different from food security.

In this sense, we recognize that efforts have been made to include some of the principles of food sovereignty, such as in paragraph 31iv, when referring to "local ownership and control over production". This paragraph could be further strengthened by adding "diverse" to its last segment ("production of appropriate, healthy, affordable [and diverse] foods"). Principles of food sovereignty may also be introduced into the policies and strategic approaches under section 3.7 on women's access to and control over natural and productive resources, in relation to women's equal ownership and control over production, besides equal tenure or inheritance rights.<sup>4</sup>

<sup>&</sup>lt;sup>3</sup> Seibert, I., Talat Sayeed, A., Georgieva, Z., Guerra, A. (2019). Without Feminism, there is no Agroecology. The Right to Food and Nutrition Watch, 11: Women's Power in Food Struggles. https://www.righttofoodandnutrition.org/node/1297

<sup>&</sup>lt;sup>4</sup> The UN Women and OHCHR has proposed the following working definition of "women's land rights":

<sup>&</sup>quot;Women's rights to land and other productive resources" or "women's land rights" mean the ability of women to own, use, access, control, transfer, inherit and otherwise take decisions about land and related resources, as well as women's rights to land tenure security (including community, customary, collective, joint and individual tenure). They also encompass rights to meaningfully participate in discussions and decision-making on land law, policy and programming throughout the cycles of assessment and analysis, planning and design, budgeting and financing, implementation and monitoring and evaluation."

Realizing Women's Rights to Land and Other Productive Resources (2nd edition). UNWOMEN and OHCHR (2020). https://www.unwomen.org/en/digital-library/publications/2020/10/realizing-womens-rights-to-land-and-other-productive-resources-2nd-edition

We believe that the 6 pillars of food security, including agency and sustainability, which are referred to in paragraph 8 are a good approximation to the food sovereignty principles. In this sense, we strongly request that this approach is kept within the next versions of the document.

We note that food sovereignty has been recognised in the UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP), identified in Part 2 as part of the core principles underpinning the Guidelines.<sup>5</sup>

It has also been recognised by the General Recommendation 34 on the Rights of Rural Women elaborated by the UN Committee on the Elimination of Discrimination Agains Women states the following in article 64: "States parties should ensure the realization of the right to food and nutrition of rural women within the framework of food sovereignty and ensure that they have the authority to manage and control their natural resources"

Moreover, food sovereignty's relevance to the progressive realisation of the right to food was also noted by the <u>CFS Chair's Summary</u> of the High Level Forum on Women's Economic Empowerment held in September 2017, setting the first stone of this policy convergence process within CFS.

Finally, the CSM firmly believes that the **implications of the realization of the right to adequate food need to be better interconnected within the document**, to fully grasp the indivisibility of human rights. "Adequacy and sustainability of food availability and access", as presented by the Committee on Economic, Social and Cultural Rights' General Comment No. 12 on the Right to Food should guide the different analysis and policy approaches. Issues of redistribution of unpaid care work, public services, and procurement (eg. Provision of Healthy and diverse school meals), regulation of unhealthy eatable products (eg. Interpretative Front of Pack Labelling, regulation of marketing of Ultra-processed foods, ...) should be touched upon in a systematic perspective when addressing the current challenges of malnutrition (eg. Paragraph 50). The language seems to be making women responsible for providing nutritious diet to the household. One of the biggest reasons for dependence on processed food is due to their cheapness, and affordability by the poor. Fresh food is often expensive and inaccessible, due to the structural barriers. Therefore, reliance on processed food may not be due to working women cutting down on cooking time but the economic condition of the household. This point should be cautious of neither justifying women's gendered role of food preparation nor promoting "tech fixes" such as food fortification.

This is equally true when addressing technologies within the document. "Labour-saving technologies" alone will not solve the problem of the burden women and girls face regarding care and domestic work (paragraph 52). The structural analysis and its systemic RESPONSE must be the thread to be followed by the Guidelines.

Lastly, gender-based violence can also manifest itself as denial of access to adequate food and **nutrition.** The Guidelines, therefore, should not just point out to the contributory role of women in

<sup>&</sup>lt;sup>5</sup> Article 15 (4) of UNDROP provides as follows: "Peasants and other people working in rural areas have the right to determine their own food and agriculture systems, recognized by many States and regions as the right to food sovereignty. This includes the right to participate in decision-making processes on food and agriculture policy and the right to healthy and adequate food produced through ecologically sound and sustainable methods that respect their cultures."

food security and nutrition, but they should also highlight that women and LBGQTI persons, due to GBV, are denied access to food and nutrition themselves.

## STRUCTURE OF THE FIRST DRAFT

We welcome the fact that the structure of the whole document has been revised since the Zero Draft, including a section on cross-cutting issues, and prioritizing some structural causes of gender inequalities such as gender-based violence (GBV) and unpaid care work. Along this line, we appreciate the fact that social protection has been included into the cross-cutting issues, although the universality of social protection should be highlighted<sup>6</sup>, instead of a "targeting systems" approach, which tends to be emphasized in the current draft. The establishment of universal social protection floors must be the priority of States to fight against gender inequalities and malnutrition. Social protection measures should be available for all - not just the poorest populations. It should not exclude women working in the informal economy. We suggest the following changes for:

- Paragraph 30iv): "Establish national universal social protection floors as a tool to fight against poverty and gender inequalities; and guarantee equal access to benefits and protection for women to compensate the effects of discrimination and inequalities of the societies, including in times of vulnerability, emergency and protracted crisis"
- Paragraph 107: Mention universal social protection floors first, before addressing "shock-responsive" mechanisms. Either delete "shock-responsive" or add "Universal and shock-responsive
- Paragraph 109: this paragraph has lost much of its quality, as it misses the transformative potential of social protection => we need to go back to what was written in the Zero Draft "A comprehensive set of social policies and programs can significantly contribute towards advancing gender equality in a society and address the multiple and intersecting forms of discrimination and disadvantage faced by women and girls. Social protection can also be a transformative lever that can be used to challenge and transform gender relations, for example when it is used to redistribute unpaid care work." (Sentence to reintegrate)
- 113iii): add "long term and universal"

We also want to stress out that GBV occurs not just in times of food crisis. An important step would be to explicit the need to identify and make accountable the perpetrators of GBV and sexual exploitation, regardless of their institutional belonging.

We still feel, however, that there is a **need for greater consistency between Problem Statements and Policy Discussions** within different thematic sections where often the policy areas seem to be disconnected from their respective rationales.

<sup>&</sup>lt;sup>6</sup> "Recognizing the overall and primary responsibility of the State in giving effect to this Recommendation, Members should apply the following principles: (a) universality of protection, based on social solidarity;" Recommendation (No. 202) Concerning National Floors of Social Protection, International Labour Organization (2012).

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100 INSTRUMENT ID:3065524

<sup>&</sup>quot;This means defining social protection neither as an emergency response to a situation crisis, nor as charity – but rather as a set of permanent entitlements prescribed by domestic legislation, defining individuals as rights-holders and public authorities as duty-bearers." Looking back to look ahead: A rights-based approach to social protection in the post-COVID-19 economic recovery. Report. The Special Rapporteur for extreme poverty. 2020. https://www.ohchr.org/EN/Issues/Poverty/Pages/Covid19.aspx

#### **LANGUAGE OF THE FIRST DRAFT**

We also recognize that some of the language and concepts have also progressed and have become more precise. This is the case for references to "patriarchal system and structure", "women and girls in all their diversities", "vital to challenge masculine gender norms that may affect men's willingness to take on these shared roles". We strongly believe that this advancement should not be lost in the future drafts of the Guidelines, particularly when it comes to measures promoting non-discrimination and gender equality.

Nevertheless, our demand on **strengthening the perspective of non-binary and non-hegemonic gender identities and roles** persists. Addressing gender must have a broader vision than the sexual diversity of women. It is therefore necessary to advance gender-inclusive language in all CFS guidelines and policy work. Human Rights are for all, and not only for some.

Greater inclusion of LGBQTI persons is needed so the Guidelines do not fall into a binary heteronormative approach. This should be the case for paragraphs speaking about multiple and intersecting forms of discrimination, such as paragraph 25 and section 3.3, but also when participation in decision-making processes is referred to, such as in paragraph 57ii). In particular, section 3.3.1. makes no mention of discrimination against gender minorities and sexual orientation when addressing the issues and challenges. Moreover, in section 3.6 paragraph 122 should also refer to gender-based violence in the context of COVID 19 and how it has also increased discrimination and violence against LGBQTI people.<sup>7</sup> In the same line, the document should ensure that gender-disaggregated data is inclusive of LGBQTI people (paragraph 27).

The Guidelines should avoid falling into the "traditional nuclear family" model. We suggest harmonizing the whole text by using household rather than "family". This would allow that global scope of the policy instrument can be ensured.

We believe that the reference made to "human rights defenders" is also to be kept, along with considering including a specific mention to the "environmental human rights defenders". In this sense, the Guidelines should include recommendations to ensure that violations and abuses against them are investigated and that those responsible are held accountable.

Progress has been made regarding **Indigenous Peoples** in terms of inclusion of traditional, Indigenous and local knowledge (paragraph 27), and them experiencing inequality and discrimination (paragraph 25). We appreciate the fact that the document still highlights the importance of free, prior, and informed consent.

The final document can still be stronger in terms of language. In the first place, all references to them must be capitalized, as Indigenous is a proper noun, not an adjective. Furthermore, the document should be more inclusive of them across all sections. For instance, land and waters are also central and fundamental to practising culture and self-determination for Indigenous Peoples (paragraph 81). In countries where sovereignty has not been ceded, access and control of land for Indigenous Peoples is the highest priority. This is partially addressed in paragraphs 86 and 91 but requires strengthening.

The scope of food production could also be further expanded by including **fisherfolks and fisher communities**.

<sup>&</sup>lt;sup>7</sup> UN Independent Expert on protection against violence and discrimination based on Sexual Orientation and Gender Identity, 2020. *The Impact Of The Covid-19 Pandemic On The Human Rights Of LGBT Persons* . Report to the UN General Assembly. <a href="https://documents-dds-ny.un.org/doc/UNDOC/GEN/N20/197/62/PDF/N2019762.pdf?OpenElement">https://documents-dds-ny.un.org/doc/UNDOC/GEN/N20/197/62/PDF/N2019762.pdf?OpenElement</a>

#### REFERENCES IN THE FIRST DRAFT

We appreciate the fact that the list of references to international law (paragraph 17) has been expanded and does include mention to UNDROP, UNDRIP, ILO Conventions and Resolutions, as well as CEDAW's General Recommendation 34. The Guidelines should also include references to:

- Texts denouncing discrimination on the basis of gender identity or sexual orientation and in particular Resolution 32/2 adopted by the Human Rights Council on June 30, 2016 which deals with Protection against violence and discrimination on the basis of sexual orientation and gender identity: <a href="https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/154/16/PDF/G1615416.pdf?OpenElement">https://documents-dds-ny.un.org/doc/UNDOC/GEN/G16/154/16/PDF/G1615416.pdf?OpenElement</a>
- ILO Recommendation 202 on Social Protection Floors: <a href="https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\_INSTRUMENTID:3065524">https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\_INSTRUMENTID:3065524</a>

We would like to stress again that we are still concerned about the chapeau adopted by the CFS in 2021 vis-à-vis adopted international instruments, as we still believe that it undermines the existing international law. The framing of this chapeau was highly controversial for CSM during the negotiations of the Food Systems and Nutrition Guidelines, and led CSM Constituencies to leave the negotiations. We still demand that paragraph 17's opening should state the following: "The Guidelines are intended to be applied, consistent with the following instruments as far as each of these instruments are relevant and applicable".

## COVID-19

We welcome that a section on the impacts of COVID-19 has been included within part 3.10. The same analysis should be done within section 3.6, as the pandemic has shown the extent of injustices and inequalities in the distribution of care work, the dramatic raise of Gender based and sexual violence but also within employment. By now, the Guidelines should feel comfortable enough to consider the large amount of evidence showing that, in this patriarchal model, the first ones to lose employment are women and that the burden of care work within households fell automatically and directly on them. Due to rising unemployment, especially women were pushed out of the labour market, falling incomes, disruptions in the value chains all contributed towards food insecurity, which impacted women the most.

This section should also highlight the lack of work health and safety in processing facilities during the COVID-19 pandemic, particularly impacting migrant women and undocumented workers. We are sharing again the findings of the CSM Women's Report on the impacts, communities' responses and feminist policy demands to COVID-19, that could further inform the framing of this section<sup>8</sup>.

# WHAT IS STILL MISSING IN THE FIRST DRAFT

We see references to conflicts (e.g. paragraph 44, 124-127) but never to the situation of women in occupied areas. We need clear references to state/extra-territorial occupations, which undermine women's rights, access to land, resources, social protection, food, healthcare, etc in particular for women in the Middle East and North African region. We suggest including the word occupation in these paragraphs following already agreed language in the Framework for Action for Food Security

<sup>&</sup>lt;sup>8</sup> Gender, COVID-19 and Food Systems: Impacts, Community Policy Responses and Feminist Policy Demands (October 2020) by CSM Women Working Group authored by Jessica Duncan an Priscilla Claeys. <a href="https://www.csm4cfs.org/wp-content/uploads/2020/10/NEW\_Gender-COVID-19-and-Food-Systems-October-2020">https://www.csm4cfs.org/wp-content/uploads/2020/10/NEW\_Gender-COVID-19-and-Food-Systems-October-2020</a> compressed.pdf

and Nutrition in Protracted Crisis: "in all situations of conflict, occupation, terrorism, or man-made and natural disasters;" (for example para 25, i) FFA).

This is equally the case for racism and discrimination against cast and ethnicity which are completely absent within the document. While we strongly appreciate the recognition that women experience intersecting forms of discrimination, structural issues such as race, cast, disabilities, sexual orientation and gender identity could be spelled out as practical examples in paragraph 25. In this way, the Guidelines would reflect the lived, intersecting challenges faced by women and LGBQTI persons.

**Marginalized groups need more references** in the document, as not all of them are mentioned. For instance, this is the case for paragraph 44.

Migrant women's specific challenges and forms of violence and discrimination should also be acknowledged and addressed in these Guidelines as highly relevant to their food insecurity and malnutrition. Migrant women's right to food is both at risk in their place of origin, throughout the migration journey and in their place of arrival. Their conditions and demands are often invisible and unnamed, exacerbating their vulnerability. Often the structural causes driving to migration are the same of the ones impacting people's right to food in a certain territory: climate crisis, conflicts and protracted crisis, land grabbing and corporate capture of natural resources and criminalization of human rights defenders, just to mention a few.

Regarding access to financial services, there is no mention of family indebtedness as an economic barrier. Support for territorial markets, saving and credit schemes, and market opportunities designed for women producers, processors and workers should be included.

# **PROBLEMATIC ISSUES IN THE FIRST DRAFT**

As CSM, we welcome the improvement of the language on multi-stakeholder platforms in section 2 of the document. Nevertheless, we believe that language on conflicts of interest is still weak, and would insist on moving beyond agreed language to incorporate the "need for safeguards against conflicts of interest" rather than "management" of them. References to "multistakeholder platforms/collaborations/approaches/partnerships" without any mention of rules of engagement should be avoided or, at the very least, followed by a rights-based language on the differentiation between rights-holders and the responsibility of duty bearers, in particular vis-à-vis their roles and responsibilities. Moreover, we reiterate our concerns on placing multistakeholder partnerships within the section on "Core Principles"; paragraph 29 does not correspond to a principle and is conflicting with the previous paragraphs of this section.

The focus on entrepreneurship in the Guidelines fails to acknowledge the diversity within food systems, as well as undermines the attempts to strengthen the production and consumption model, which is ecological, equitable, just and resilient, namely agroecology. The Guidelines should be more coherent in the direction they propose either the status-quo of a productivist system with its extractivist and unsustainable model is outlined or the document decides to take a step forward and make the ambitious choice of moving towards a true transformation of food systems. As CSM we will continue to reiterate the need for the CFS to go into the second direction. We can list here several examples of the existing contradictions within the draft:

- While some sections recognize the unsustainability of an "industrial" model of food production (paragraph 45), other sections instead seek to integrate women into a "productivist" approach (paragraphs 63, 70, 79iv, 95, 97, 106iii). Considering large-scale/industrial agriculture as the system to which women should aspire is problematic. Small-scale

- food production-provisions are the foundation and backbone of local, territorially embedded food systems, women face challenges in these as well, and policies and programmes need to support both, local food systems as well as women's agency and capacities in them.
- Some of the sections remain in a patriarchal productivist and capitalist approach, with economic growth as the ultimate goal. The use of "untapped potential for women" is one example as is the case for paragraph 85. On the one hand, this undermines the existing references to women's agency, knowledge, and autonomy. On the other hand, it is high time evidence on the fallacies of the "growth" discourse are acknowledged by policy instruments.

On digitalization and data collection, the Guidelines need to be more cautious on the suggested text. They should avoid the attitude to insist that these are the solutions. We reiterate that these are just "tech-fixes" that do not address the structural and systemic barriers to achieve gender equality and respect women's and LGBQTI persons' rights. Moreover, taking into account the global scope of the Guidelines, particularly for the Global South, these are far-fetched, or even impossible solutions, where the diversity of knowledges is ignored and accessibility and literacy for these technologies are far from the realities on the territories. We strongly recommend avoiding this approach of a "one-way" solution.