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# Committee on the Elimination of Discrimination against Women: Concluding observations on the combined seventh and eighth periodic reports of Germany

(shortened)

1. The Committee considered the combined seventh and eighth periodic reports of Germany (CEDAW/C/DEU/7-8) at its 1482nd and 1483rd meetings, on 21 February 2017 (see CEDAW/SR/1482 and 1483). The Committee's list of issues and questions is contained in CEDAW/C/DEU/Q/7-8 and the responses of Germany are contained in CEDAW/C/DEU/Q/7-8/Add.1.

## (...) B. Positive aspects

4. The Committee welcomes the progress achieved since its consideration in 2009 of the State party's sixth periodic report (CEDAW/C/DEU/CO/6) in undertaking legislative reforms, (...)

5. The Committee welcomes the State party's efforts to improve its institutional and policy framework aimed at accelerating the elimination of discrimination against women and promoting gender equality, (...)

7. The Committee wishes to commend the significant and generous efforts made by the State party in receiving high numbers of asylum seekers and refugees forced to flee their countries throughout 2015 and early 2016. (...)

## D. Principal areas of concern and recommendations

### *Implementation of the Convention, the Optional Protocol thereto and the Committee's general recommendations*

9. The Committee welcomes the numerous efforts being made by the State party to disseminate the Convention. However, it is concerned that disparities in the implementation of the Convention across the Länder and municipalities remain. It is further concerned at the limited awareness among the judiciary and legal professionals of the Convention, the Optional Protocol thereto, and the general recommendations of the Committee. (...)

### *Application of the Convention under the federal system (...)*

12. The Committee, (...), reiterates its previous recommendation (see CEDAW/C/DEU/CO/6, para. 16) that effective coordination of the structures at all levels be strengthened in order to ensure uniformity of results in the implementation of the Convention throughout the State party. It further recommends that the State party strengthen the mandate of the German Institute for Human Rights and grant it the authority to ensure the transparent, coherent and consistent implementation of the Convention throughout its territory.

### *Legislative framework*

13. (...) However, the Committee is concerned that the 2006 General Law on Equal Treatment remains limited in scope and fails to comprehensively protect women from gender-based discrimination in the domestic and private spheres. While noting the shift in the burden of proof in civil and administrative proceedings concerning discrimination, the period during which discrimination claims can be made remains extremely limited. The Committee is further concerned that group action enabling women's organisations and trade unions to bring cases of discrimination before the courts is currently not provided for through the Act. In addition, it is concerned that Article 9 of the Act provides for questionable differential treatment on the grounds of religion or belief.

14. The Committee recommends that the State party amend the General Law on Equal Treatment in line with the proposals outlined in the evaluation conducted by the Federal Anti-Discrimination Agency, and ensure that its range of application be expanded. It therefore recommends that the State party introduce the right of group action by women's organisations and trade unions to bring discrimination cases before the courts and extend the deadline for submitting discrimination complaints to at least six months. It further recommends that dismissals be added to the General Law on Equal Treatment and that Article 9 of the same Law be abolished.

### *Extraterritorial State obligation (...)*

16. The Committee recommends that the State party:

(a) Strengthen its legislation governing the conduct of corporations registered or domiciled in the State party in relation to their activities abroad, including by requiring those corporations to conduct human rights and gender impact assessments prior to making investment decisions;

(b) Introduce effective mechanisms to investigate complaints filed against those corporations, with a mandate to, inter alia, receive complaints and conduct independent investigations and incorporate a gender perspective into the 2016 NAP;

(c) Adopt concrete measures, including a redress mechanism to facilitate access to justice for women victims of human rights violations and ensure that judicial and administrative mechanisms are in place take into account a gender perspective;

(d) Ensure that trade and investment agreements negotiated by the State party recognize the primacy of its international human rights obligations over investors' interests, and that the introduction of investor-State dispute settlement procedures through the Comprehensive Economic and Trade Agreement does not create obstacles to full compliance with the Convention.

**National machinery for the advancement of women and gender mainstreaming (...)**

18. The Committee reiterates its previous recommendations (CEDAW/C/DEU/CO/6, para. 24) that the State party:

(a) Reinforce the integrated approach to gender mainstreaming and introduce effective monitoring and accountability mechanisms, including through the systematic continuation of gender impact assessments on legislation across all Ministries, ensuring that evaluation is measured on the basis of compliance with relevant targets and indicators and effective data collection;

(b) Develop a comprehensive national gender strategy, policy and action plan that addresses the structural factors causing persistent inequalities, including intersecting forms of discrimination against disadvantaged and marginalized women and girls;

(c) Adopt an integrated gender-budgeting process (including the implementation of the Sustainable Development Goals) with effective monitoring and accountability mechanisms across all sectors and levels of government drawing on the experience of those Länder which have successfully implemented such processes;

(d) Strengthen the mandate of the Federal Anti-Discrimination Agency and provide it with the necessary authority to file court cases, launch investigations, impose sanctions and ensure that it is provided with adequate human, technical and financial resources to effectively implement its mandate. Establish and sustain independent anti-discrimination offices in all Länder;

(e) Consider amending the Federal Equality Law to extend eligibility for appointment as equality delegate to men;

(f) Ensure the adequate allocation of human, technical and financial resources to the Ministry for Economic Cooperation and Development so as to allow for the full and effective implementation of its Gender Equality in German Development Policy and in its Gender Action Plan.

**(...) Stereotypes**

21. The Committee welcomes the legislative and other measures taken to address discriminatory stereotypes, and notes the pilot projects related to the portrayal of transgender persons in the media. The Committee is nevertheless concerned that:

(a) Prevailing stereotypes about the roles and responsibilities of women and men in the family and in society continue to impede progress in advancing gender equality;

(b) Stereotyped and sexualized images of women continue to be depicted in the media and advertisements;

(c) Stereotyped media portrayals and negative images of ethnic minority women and migrant women undermine their ability to integrate into society;

22. The Committee reiterates its previous recommendations (see CEDAW/C/DEU/CO/6, para. 28) that the State party:

(a) Strengthen its efforts to eliminate discriminatory stereotypes regarding the roles and responsibilities of women and men in the family and in society, including through awareness-raising campaigns;

(b) Establish an education strategy for media professionals comprising guidelines and monitoring mechanisms to eliminate discriminatory stereotypes against women, and encourage gender

sensitive media coverage, particularly in the run up to elections; introduce measures to promote equal representation of women and men in the media and strengthen the role of the German Advertising Standards Council to ensure adequate sanctions and enforcement powers in addressing discriminatory gender stereotypes; and,

(c) Introduce incentives for the media to promote positive images of ethnic minority, migrant women, and refugee and asylum seeker women.

**Harmful practices**

23. The Committee welcomes the adoption of legislative and other measures to combat harmful practices, including the 47th Criminal Law Amendment Act of 2013 prohibiting female genital mutilation and the establishment of the Inter-Ministerial Working Group on Intersexuality/Transsexuality (IMAG). However, the Committee is concerned about:

(a) Legislative provisions allowing marriage under the age of 18 years in exceptional cases;

(b) The significant number of girls living in the State party, often from migrant families, who have undergone or are at risk of being subjected to female genital mutilation or other harmful practices;

(c) The limited information and education projects available on harmful practices, particularly for ethnic minority and migrant women, along with inadequate training for health and social services professionals and the lack of adequately-provisioned counselling services throughout the State party;

(d) The lack of clear legislative provisions prohibiting unnecessary medical procedures to be performed on infants and children with indeterminate sex until they reach an age when they are able to provide their free, prior and informed consent;

(e) Inadequate support and lack of effective remedies for intersex persons, who have undergone medically unnecessary surgical procedures, at a very early age, often with irreversible consequences, resulting in long term physical and psychological suffering.

24. In light of the joint general recommendation/general comment No. 31 of the Committee and No. 18 of the Committee of the Rights of the Child on harmful practices (2014), the Committee recommends that the State party:

(a) Ensure safeguards to protect girls under the age of 18 years who have been allowed to marry;

(b) Systematically collect disaggregated data on the incidence of harmful practices in the State party and continue to strengthen preventive and protection measures to eliminate female genital mutilation;

(c) Develop awareness raising campaigns and ensure that information is readily available to victims of female genital mutilation and ensure that health and social services professionals are sufficiently trained to identify potential victims and that perpetrators are brought to justice;

(d) Adopt clear legislative provisions explicitly prohibiting the performance of unnecessary surgical or other medical treatment on intersex children until they reach an age when they can provide their free, prior and informed consent; provide families with inter-

sex children with adequate counselling and support; and ensure that the German Medical Association provides information to medical professionals on the legal prohibition of unnecessary surgical or other medical interventions for intersex children;

(e) Ensure effective access to justice, including by amending the statute of limitations, for intersex persons who have undergone unnecessary surgical or other medical treatment without their free, prior and informed consent and consider the proposal by the German Ethics Council to establish a state compensation fund.

### *Gender-based violence against women*

25. The Committee commends the numerous measures taken by the State party to address gender based violence, particularly through the 2016 amendment to Section 177 of the Criminal Code, criminalising sexual assault; sexual assault by use of force or threat of force and rape. It further welcomes the announcement made during the dialogue with the Committee that the State party will ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) in 2017. However the Committee is concerned about:

(a) The high prevalence of domestic violence against women, the absence of a comprehensive prevention and early intervention strategy, along with the prevailing attitudes among judicial authorities that cases of domestic violence are a private matter;

(b) Underreporting of gender-based violence to the police and the low prosecution and conviction rates;

(c) Reports suggesting that women with disabilities, particularly those living in residential institutions, are two to three times more likely to be exposed to various forms of violence than other women;

(d) Reported incidents of various forms of sexual and domestic violence against women in refugee shelters by their partners, shelter staff or security staff; and the legal restrictions on their freedom often forcing them to wait for several months before they can be transferred to an alternative safe shelter;

(e) Incidents of hate crimes and attacks on refugees and asylum seekers in both shelters and camps, causing injury to women and girls;

(f) Gender based stereotypes and myths surrounding rape within society and among legal professionals;

(g) The fact that women in certain cases encounter difficulties in practice in achieving recognition of their situation of particular hardship, that according to the Residence Act leads to abandonment of the requirement for cohabitation in marriage for at least 3 years to gain an independent right of residence, and may be forced to remain married to a violent spouse to avoid losing their derived right of residence.

26. The Committee recalls its general recommendation No. 19 (1992) on violence against women and reiterates its previous recommendations that the State party:

(a) Enhance its efforts to combat all forms of gender-based violence against women, and take steps to develop a comprehensive prevention strategy to address domestic violence, including through awareness raising campaigns;

(b) Encourage women to report incidents of gender-based violence, including domestic violence, and ensure that cases of violence against women are effectively investigated and that perpetrators are duly prosecuted;

(c) Establish an independent mechanism and enable it to monitor cases of violence and abuse in institutions for disabled persons, ensuring that such a body be provided with the necessary human, technical and financial resources to fully implement its mandate;

(d) Amend the law to ensure that immigration law considerations do not prevent authorities from taking prompt action to provide protection in cases of gender based violence;

(e) Promptly investigate any incidents of hate crime or attacks against refugee and asylum seeking women and girls and ensure that the perpetrators are duly prosecuted;

(f) Undertake awareness raising campaigns to educate the public about the implications of sexual violence, and strengthen capacity building programmes at both the federal and Länder levels for judges, prosecutors, police officers and other law enforcement officials on the strict application of criminal law provisions on sexual violence against women;

(g) Ensure that foreign women are not forced to remain in an abusive marriage by facilitating in practice the recognition of their particular hardship and granting them an independent right of residence; and,

(h) As announced during the Dialogue with the Committee take all steps necessary to ratify the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention) as a matter of priority.

### *Women, peace and security (...)*

28. The Committee recommends that legislation regulating arms export control be harmonised in line with Article 7 (4) of the Arms Trade Treaty and the Council Common Position 2008/944/CFSP of the EU. It further recommends that, before export licences are granted, comprehensive and transparent assessments should be conducted on the impact that the misuse of small arms and light weapons have on women, including those living in conflict zones.

### *Trafficking and exploitation of prostitution*

29. The Committee welcomes the wide range of legal and structural measures developed by the State party in the review period to combat trafficking. However, it is concerned about:

(a) The lack of a comprehensive anti-trafficking strategy, and the absence of available disaggregated data on victims of trafficking, or quantitative information on the extent of trafficking in the State party, particularly for purposes other than sexual exploitation;

(b) The low rates of prosecution and conviction in cases of trafficking in women and girls;

(c) The lack of national guidelines for the identification of victims of trafficking;

(d) The lack of systematically organized and harmonised victim assistance and rehabilitation and reintegration measures across all Länder including access to counselling, medical treatment, psychological support and redress, including compensation,

for victims of trafficking, in particular for migrant women, who are not automatically entitled to temporary residence permits unless they cooperate with the police and judicial authorities;

(e) The limited measures in place to ensure nationwide multilingual counselling and support for women victims of trafficking and women engaged in prostitution and the inadequate procedures necessary to provide alternative income-generating opportunities to women who wish to leave prostitution.

30. The Committee recommends that the State party:

(a) Establish an independent mechanism with the aim of supporting a comprehensive and effective anti-trafficking policy, and provide such a mechanism with the adequate human, technical and financial resources to enable the collection and analysis of disaggregated data on human trafficking, as well as to conduct statistical and quantitative studies on the extent of trafficking in the State party;

(b) Develop awareness raising programmes for the police and social workers at the municipal levels and investigate, prosecute and adequately punish all cases of trafficking in persons, especially women and girls;

(c) Develop national guidelines for the effective identification of victims of trafficking;

(d) Strengthen measures to systematically identify and provide support to women victims and those at risk of trafficking, in particular migrant women and unaccompanied girls, ensuring adequate access to health care, counselling services and redress including compensation. In addition strengthen human, technical and financial resources to NGOs who offer specialised victim protection and support services, and develop gender-sensitive training for social workers dealing with victims of trafficking;

(e) Grant temporary residence permits to enable all victims of trafficking to avail themselves of protective and rehabilitation measures, irrespective of their willingness to cooperate with police authorities, and ensure that the authorities adopt a victim centred approach when granting the recovery and reflection period;

(f) Provide an assessment, in the next periodic report, on the revised criminal law in relation to human trafficking as adopted in October 2016, which includes a provision to bring clients of victims of trafficking or sexual exploitation to justice;

(g) Strengthen assistance provided to women and girls who wish to leave prostitution, including by providing exit programmes and alternative income-generating opportunities.

#### ***Participation in political and public life (...)***

32. The Committee reiterates its previous recommendations (see CEDAW/C/DEU/CO/6, para. 32) that the State party strengthen its efforts to increase the number of women in elected decision-making bodies at the federal and Länder levels as well as in appointed positions at the municipal level, with a view to achieving equal representation of women and men in political and public life. It further recommends that awareness raising campaigns be developed to enhance the understanding that the full, equal, free and democratic participation of women on an equal basis with men in political and public life is a requirement for the full implementation of women's human rights.

#### ***Education (...)***

34. The Committee recommends that the State party:

(a) Encourage further diversification of the educational choices of women and men and girls and boys, revise educational curricula at the Länder level to ensure the inclusion of women's human rights, ensure that gender sensitive teaching materials and teaching materials that promote diversity and the protection of all minority groups, are available across all Länder, and include a module on gender stereotypes in education within national teacher training programmes;

(b) Address discriminatory stereotypes and structural barriers that may deter girls from progressing beyond secondary education and enrolling in traditionally male-dominated fields of study, such as mathematics, information technology and science; and,

(c) Continue to promote and monitor the career development of women in the education system to ensure equal access to senior management positions at all levels of the education system and prevent hidden or indirect discrimination faced by women in this regard;

(d) Ensure that all asylum seeking and refugee children have access to language course and integration programmes.

#### ***Employment***

35. (...) However, it notes with concern:

(a) That the prevailing gender pay gap (currently 21 per cent) in both the public and private sectors continues to impact negatively on women's career development and pension benefits due to the lack of effective implementation of legislation on the principle of equal pay for work of equal value;

(b) The persistence of horizontal and vertical occupational segregation, the concentration of women in the lower-paid service sectors and in temporary and part-time work due to their traditional role as caregivers for children, and women's under-representation in managerial positions in companies;

(c) The gender pension gap which stands at 53 per cent (2016), with men receiving on average 43 percent more than women in pension benefits;

(d) The limited access by migrant, refugee and asylum-seeking women, as well as women with disabilities, to the formal labour market;

(e) The prevailing negative stereotypes that mothers active in the labour market are confronted with, as well as an income tax system for couples, depending on the combination of the tax collection categories, and social benefit provisions, that may adversely affect women's full professional insertion in the labour market and financial autonomy and security;

(f) The insufficient number of high quality child care facilities, despite the considerable efforts that have been made in this regard.

36. Reiterating its previous recommendations (CEDAW/C/DEU/CO/6, para. 40) the Committee recommends that the State party:

(a) Strengthen efforts to eliminate the gender wage gap and ensure equal opportunities for women and men in the labour market, including through the continued use of temporary special measures, with time-bound targets, in line with article 4, paragraph 1, of the Convention and its general recommendation



No. 25 (2004) on temporary special measures. Furthermore adopt the draft law on equal pay as a matter of priority;

(b) Provide skills training and incentives to orient women to non-traditional professions, eliminate horizontal and vertical occupational segregation in the public and private sectors, and monitor the implementation of temporary special measures to enhance the representation of women in managerial positions in companies, and encourage companies to create part time opportunities in high level positions;

(c) Strengthen the statutory pension as a means of ensuring a decent standard of living for retired women and amend legislation to prevent a statutory, company or partially state-funded pension from being deducted from basic social security benefits for job seekers benefits;

(d) Ensure that victims of sexual harassment in the workplace have access to effective mechanisms and remedies, and encourage employers to conduct regular reviews of company culture to prevent the occurrence of such harassment;

(e) Continue to effectively implement the European Social Fund programme “Strong Careers – Mothers with a Migration Background Start Out”, and take into account the needs of other disadvantaged groups of women, especially women with disabilities, and introduce targeted measures to create further employment opportunities for these women;

(f) Strengthen awareness raising campaigns to address the prevailing negative stereotypes limiting mothers’ insertion in the labour market, and review the tax system and social benefit provisions that – depending on the applied combination of the tax collection categories – penalize women’s full participation in employment;

(g) Introduce adequate staffing ratios for day-care centres, ensuring high quality and reliable after school care for children, and increase all-day care options.

#### **Health (...)**

38. In line with its general recommendation No. 24 (1999) on women and health, the Committee recommends that the State party:

(a) Ensure that modern contraceptives are accessible, affordable and available throughout the territory of the State party to all women and girls, in particular those living in poverty and/or in remote areas;

(b) Ensure access to safe abortion without subjecting women to mandatory counselling and a 3 day waiting period which WHO has declared to be medically unnecessary, and ensure that such procedures are reimbursed through health insurance;

(c) Consider the repeal or amendment of section 8 of the Residence Act and ensure that undocumented migrants are given the same rights to access the documentation necessary to access non-emergency health services, without the risk of being denounced by medical personnel and deported.

#### **Economic empowerment of women**

39. (...) However, the Committee remains concerned that:

(a) Women continue to be disproportionately affected by poverty, particularly single mothers, older women, migrant women and women with disabilities;

(b) The significant number of parents, predominantly fathers, who fail to pay child maintenance, and the often limited and one-sided access to maintenance advances, are one reason single female headed households are at considerable risk of falling into poverty;

(c) The limited data available on the economic consequences of divorce on women.

40. The Committee recommends that the State party:

(a) Adopt a national poverty reduction strategy with a focus on the most disadvantaged and vulnerable groups of women, integrating a human rights and gender-based approach, and ensuring that the development and implementation of the strategy are fully inclusive, and encourage the active participation of women;

(b) Design a sustainable system of child maintenance and introduce means tested child allowance along with minimum maintenance payments for children after their parents separate or divorce;

(c) Conduct research and collect disaggregated data to assess the economic impact of divorce on women with a view to adopting public policies and programmes to improve their economic situation.

#### **(...) Disadvantaged groups of women**

##### *Migrant and minority women (...)*

44. The Committee recommends that the State party take effective measures to eliminate discrimination against migrant women and minority women, both in society at large and within their communities, by developing awareness raising campaigns and engaging with the media to prevent intersecting forms of discrimination against these women.

##### *Transgender women*

45. The Committee notes as positive the establishment of the Inter-Ministerial Working Group on Intersexuality/Transsexuality (IMAG), and the possible revision of the Transgender Law, (...)

46. The Committee recommends that the State party

(a) Revise the Transgender Law to harmonise it with international standards on non-discrimination, and to alleviate and simplify the conditions under which gender reassignment treatment can be obtained and ensure that health insurance companies reimburse the costs for such interventions without unreasonable barriers;

(b) Strengthen efforts to eliminate discrimination against transgender persons, including through awareness raising campaigns, and appropriate training for police personnel and among the judiciary.

##### *Refugee and asylum-seeking women (...)*

48. In line with its general recommendations No. 32 (2014) on the gender-related dimensions of refugee status, asylum, nationality and statelessness of women and No. 30 (2013) on women in conflict prevention, conflict and post-conflict situations, the Committee recommends that the State party:

(a) Review the decision to postpone family reunification for subsidiary protection beneficiaries, given that it is an important legal and safe pathway to ensure integration, particularly for vulnerable women and girls;

(b) Transpose the provisions of European Union asylum legislation in relation to reception conditions and asylum procedures reflecting the specific needs of particularly vulnerable refugee and asylum seeking women in all measures related to integration;

(c) Ensure that the Federal Office for Migration and Asylum is adequately resourced to deal with the significant backlogs it is currently facing, and ensure that the specific needs of vulnerable groups of asylum-seeking and refugees, as well as women and girls, arriving in the State party are addressed as a priority concern throughout the asylum process.

#### *Marriage and family relations (...)*

50. The Committee recommends that the State party:

(a) Establish a monitoring mechanism to ensure that shared custody is practiced and that child maintenance orders reflect the reality in relation to the time and cost allocation between parents;

(b) Ensure that single female headed households are not penalised due to protracted time out of work as a result of women's care responsibilities;

(c) Eliminate income tax allowances for families that lower the tax burden but widen the gap in the tax wedge between the first and second earner and introduce incentives to encourage women who live in families to enter the labour market;

(d) Establish a State compensation scheme to provide redress by supplementing the pensions of women divorced in the former German Democratic Republic.

#### *Beijing Declaration and Platform for Action*

51. The Committee calls upon the State party to use the Beijing Declaration and Platform for Action in its efforts to implement the provisions of the Convention.

#### *(...) Dissemination*

53. The Committee requests the State party to ensure the timely dissemination of the present concluding observations, in the official language of the State party, to the relevant State institutions at all levels (federal and Länder), in particular to the Bundestag, the Bundesrat, the Parliaments of the Federal States, and federal and State Ministries and courts, to enable their full implementation.

#### *(...) Follow-up to the concluding observations*

55. The Committee requests the State party to provide, within two years, written information on the steps taken to implement the recommendations contained in paragraph 38 (b), 40 (b), 48 (b) and 50 (d) above.

#### *Preparation of the next report*

56. The Committee invites the State party to submit its ninth periodic report in March 2021. (...)

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## Die Verhandlungen des CEDAW-Ausschusses zum deutschen Staatenbericht im Lichte des Alternativberichts

### Dr. Katja Rodi

Stellvertretende Vorsitzende der djb-Kommission Europa- und Völkerrecht, wissenschaftliche Mitarbeiterin und Hochschuldozentin, Ernst-Moritz-Arndt Universität Greifswald

Bei den Verhandlungen des CEDAW-Ausschusses mit der deutschen Bundesregierung zum kombinierten 7. und 8. Deutschen Staatenbericht lagen den Ausschussmitgliedern der Alternativbericht der CEDAW-Allianz<sup>1</sup> und die Ergänzungen der Allianz auf die Antworten der Bundesregierung zu den List of Issues<sup>2</sup> als ergänzende Informationsquellen vor. Erfahrungsgemäß bezieht der Ausschuss diese Informationen aus der Zivilgesellschaft in seine Verhandlungen und Bewertungen ein. Interessant ist daher, inwieweit dieses Mal die Themen und Darstellungen der CEDAW-Allianz Einfluss auf die gerade abgeschlossenen Verhandlungen gehabt haben. Dieser Frage soll anhand der List of Issues und der Abschließenden Bemerkungen („Concluding Observations“ – CO) des CEDAW-Ausschusses<sup>3</sup>, mit denen das Staatenberichtsverfahren abgeschlossen wurde, nachgegangen werden. Der Alternativbericht entstand in intensiven Diskussionen von sieben Arbeitsgruppen seit dem Zusammenschluss von rund 40 zivilgesellschaftlichen Organisationen zur CEDAW-Allianz<sup>4</sup> im November 2015 und wurde am

12. Dezember 2016 der Bundesregierung<sup>5</sup> offiziell übergeben. Der nachfolgende Vergleich der Abschließenden Bemerkungen (CO) und der List of Issues mit dem Alternativbericht folgt dem Aufbau des Berichts, von dem die CO zum Teil abweichen.

### Sichtbarkeit von CEDAW und Anwendung der Konvention in der deutschen Rechtsprechung

Der Alternativbericht kritisiert wie bereits in den vorhergegangenen Staatenberichtsverfahren die unzureichende Sichtbarkeit der CEDAW-Konvention und aller weiteren in diesem

- <https://www.djb.de/themen/CEDAW/> (13.03.2017).
- Vorbereitende Fragen, die der CEDAW-Ausschuss dem Vertragsstaat schriftlich vor den Verhandlungen gestellt werden. Die aktuelle List of Issues hat die Dokumentennummer CEDAW/C/DE/Q/7-8 und ist ebenfalls veröffentlicht unter <https://www.djb.de/themen/CEDAW/> (15.03.2017)
- Alle Dokumente sind (in englischer Sprache) veröffentlicht unter [http://tbinternet.ohchr.org/\\_layouts/treatybodyexternal/SessionDetails1.aspx?SessionID=1071&Lang=en](http://tbinternet.ohchr.org/_layouts/treatybodyexternal/SessionDetails1.aspx?SessionID=1071&Lang=en) (12.02.2017).
- Die einzelnen vertretenen Gruppen werden im Bericht der CEDAW-Allianz über die 66. Sitzung der UN-Frauenrechtskonvention in dieser Ausgabe der djbZ genannt.
- An der Veranstaltung nahmen die parlamentarische Staatssekretärin bei der Bundesministerin für Familie, Senioren, Frauen und Jugend Elke Ferner und Vertreterinnen mehrerer Bundesministerien teil.