



Women's Rights Are Human Rights: U.S. Ratification of the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

Testimony for the United States Senate, Committee on the Judiciary, Subcommittee on Human Rights and Law

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“CEDAW COMPLIANCE WOULD LIMIT THE SCOPE OF DEMOCRATIC DECISION-MAKING, AND THE ROLE OF THE PRIVATE SECTOR, VOLUNTARY ASSOCIATIONS, FAMILIES, AND INDIVIDUALS THROUGHOUT AMERICAN LIFE”

I thank the Chairman and Senator Coburn for the opportunity to submit written testimony for the hearing on the ratification of CEDAW.

Discussion with CEDAW Committee Member about Democracy, Slovenia and Day Care and “Comparable Worth” in American Politics

I would like to begin my testimony with a vignette, a discussion that I had with a member of the U.N. CEDAW Committee that monitors the compliance of State Parties to the Women's Convention. I spoke to the CEDAW Committee representative (a woman from Mauritius) last year after a panel discussion on CEDAW in Washington at the American Society for International Law, of which I am a member.

We discussed compliance with the treaty in the context of tensions with representative democracy. I specifically brought up the case of the newly democratic nation of Slovenia which was chastised by the CEDAW Committee because “only 30%” of Slovenia's children were in day care centers. I asked the women from Mauritius, why this statistic constituted a problem for women rights in general, or specifically a failure to comply with CEDAW? I asked isn't the decision to either place their children in day care centers, or raise them at home a matter for parents to decide rather than UN monitors?

The UN Committee representative said that she remembered the Slovenian situation well. The problem she told me was that the Slovenian government was providing subsidies for stay at

home mothers, which was detrimental to both the women and the children. The women were missing out on career opportunities and the children were missing the educational resources and the social other benefits of being in day care. I responded that the Slovenian government was democratically elected on a “pro-family” platform that included support for family subsidies. Moreover, a future government with opposing views could reverse these policies. Isn’t this how democracy works? Isn’t it up to Slovenians to determine what family or day care policies they are going to have, or not have? The UN representative replied that the Slovenian government was “reinforcing old stereotypes.” CEDAW, she said, embodies universal norms and took precedence over the actions of a particular democratic government.

I also raised the issue of “comparable worth”, (the concept that women should be paid equally to men, not simply for the same work, but for work of “comparable value”) noting that the CEDAW Committee is promoting this concept in their monitoring of the State Parties. I pointed out to her that the concept of comparable worth is a controversial political issue in the US that Americans are addressing through their democratic process. Further, I mentioned that many Americans believe that market forces (not government) should determine wage scales. She responded that equal pay for work of comparable value was a human right and a universal norm. Neither the private sector, nor the market, nor democratic governments have the right to “discriminate,” they must adhere to universal norms such as equal pay for work of equal value, she insisted. Most importantly, she emphasized that CEDAW requires “substantive equality” (or equality of outcome) not simply equality of opportunity or equality before the law, these are just the first stages of de facto equality. At the end of our conversation, the UN representative suggested that the US could ratify CEDAW with reservations and we (the Committee) could work on having those reservations “withdrawn” later.

If CEDAW is ratified, what would compliance look like?

The conversation with the UN CEDAW Representative was enlightening. It reveals that the most important question in considering the ratification of CEDAW is: what would compliance with the Convention mean for the United States of America, for our constitutional system, for our sovereignty, for our federalism, for our economy? Fortunately, it is possible to obtain a clear picture rather quickly and easily. There are two sources that are crucial to understanding the potential impact of CEDAW in the United States: (1) The CEDAW Assessment Tool developed by the American Bar Association (ABA) and funded by the US Agency for International Development (USAID), dated January 2002¹ and (2) the CEDAW Committee’s monitoring reports of how democratic countries comply or fail to comply with the Convention.

ABA’S CEDAW Assessment Tool.

First, let us examine the ABA’s CEDAW Assessment Tool. The Assessment Tool is an over 200 page document with hundreds of specific questions. It details what states should do to be in compliance with CEDAW. The ABA document uses the official “CEDAW Commentary and Guidelines” as its authoritative source on exactly what the Convention means and doesn’t mean. For example, on the controversial issue of whether gender quotas (special temporary measures) are voluntary or required, the ABA Assessment Tool emphatically states that there is an “obligation” to implement gender quotas.

However, Article 2 (e) of CEDAW obligates States Parties to "take all appropriate measures to eliminate discrimination against women by any person, or organization or enterprise." Article 3 also reaffirms the commitment to take all appropriate measures to ensure the full development and advancement of women. Taken together, Articles 2, 3 and 4 **do, in fact, create an obligation to implement temporary special measures** policies in an effort to end discrimination against women.²

Moreover, the ABA Tool declares:

To promote further de facto gender equality, General Recommendation No. 5 encourages the States Parties to employ more temporary special measures, "such as positive action, **preferential treatment or quota system** to advance women's integration into education, the economy, politics and employment." Recommendation No. 8 also suggests that States Parties employ temporary special measures of affirmative action to ensure women equal opportunity to represent their governments internationally. General Recommendation No. 23 **further advises States Parties to establish quotas** and targeted recruitment procedures and appointments to particular posts, such as the judiciary, in order to overcome the cultural barriers that remain, after de jure compliance has been achieved.³

The ABA document clearly states that the CEDAW Convention is not simply interested in legal equality or equality of opportunity, but equality of result or equality of outcome (de-facto equality or substantive equality not de-jure equality) and, indeed that temporary special measures (gender quotas) "must be applied" in some cases.

Thus, the ABA Tool declares:

Article 4 makes it clear that the goal of the Convention is to promote the gender equality of outcome. Recognizing that legal (de jure) equality does not automatically guarantee de facto equality, Article 4 permits States Parties to employ temporary special measures for as long as inequalities continue to exist. Temporary special measures, which are defined as nondiscriminatory by Article 4, are permissible because they promote de facto equality of women. **Temporary special measures must be applied to implement effectively** all the other provisions within the Convention.⁴

Let us simply look at a few pages of this 200 page ABA document to get the flavor of what is required to comply with CEDAW. Article 3 of the CEDAW Convention declares:

States Parties shall take in all fields, in particular in the political, social, economic and cultural fields, all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality.⁵

This sounds reasonable enough. But what does this mean in terms of compliance? To assess whether a State is in de facto compliance, the ABA document recommends asking the following questions:

Has the State created a national machinery dedicated to the advancement of women through the promotion of more equitable gender roles?

If so, what is its mandate? Does it include the elimination of discriminatory laws, gender stereotyping, customs and other practices that discriminate against women?

How is it funded? **Is funding adequate?**

How is it staffed? What is their level of expertise and commitment? Are they permanent government employees or consultants?

Is there inter-agency coordination within the government to ensure compliance with CEDAW within all departments of the government?

To what level of government does the national machinery report (e.g., legislative, executive, etc.)?

Does the national machinery report to anyone outside the government (e.g., the public, the United Nations or other international organizations)?

Does the government coordinate with the NGO community when drafting policy recommendations to the legislature or within government agencies?

If so, what is the nature and quality of the coordination?

Does the national machinery or the State track national budget expenditures for programs that promote the advancement of women?

What are the results of this study (e.g., **percentages of funds spent on social and family support programs, awareness campaigns, temporary special measures to promote women's advancement in all fields**)?

Does the State and women's NGOs have a coordinated plan of action to challenge the effects of harmful cultural traditions on women?

Does the State publish and disseminate information on resources and programs benefiting women?

Does the State have a long-term plan to promote the advancement of women?

If so, were **NGOs involved in the drafting of this plan?**

Does this plan comprehensively cover all areas addressed in CEDAW?

Does this plan include specific targets, such as timelines, specific actions, and delegated responsibilities?

Who implements this plan?

Who evaluates progress of the plan's implementation? How often?

Is the evaluation published and distributed?⁶

We have quoted from the ABA's assessment compliance tool at length so that there will be no misunderstanding of what CEDAW means. This is not an "international bill of rights for women" or a "tool for the promotion of equality," as its proponents claim. Instead, as one can see from the above questions that CEDAW is an attempt: (1) to create a massive intrusive bureaucracy ("national machinery"); (2) to dictate democratic policies, even budgetary priorities ("does the national machinery track national budget expenditures?"); (3) to coordinate policy with activist-special interest groups (were NGOs involved in drafting this plan?); (4) to implement

preferential gender quotas (“[what] percentage of funds [are] spent on temporary special measures?”); and (5) to use taxpayer funds for the promotion of controversial policy objectives (“[what] percentage of funds [are] spent on awareness campaigns?”).

Further, what is the purpose of asking if the “national machinery” “reports” to “United Nations or other international organizations”? The implication is that our self-governing constitutional democracy needs the approval, or at least the imprimatur, of the United Nations to determine our own laws on discrimination and sexual equality. This implies that American sovereign self-government—that is to say, decision-making within the American constitutional process—is somehow contingent on forces outside of our nation and constitutional process.

In fact, the ABA Assessment tool emphasizes the authority of CEDAW over national law. First, the ABA document asks: how does the definition of “discrimination against women” in national law compare to CEDAW’s definition of discrimination. It, then asks, “If it [the definition of discrimination against women] does not coincide, [with CEDAW’s] what measures have been taken (and by whom) to harmonize CEDAW’s definition of discrimination against women with the State’s definition.”⁷ The implication is that CEDAW’s definition has precedence over national law.

This point is made even clearer on the following page of the ABA document. The ABA recommends asking: “Is CEDAW directly applied and given effect in courts as part of national law? And then the most revealing question of all: “What training programs exist to educate judges and other legal professional about CEDAW’s precedence over national law”?”⁸ The implication of this question is that if there is no training program in which judges learn that CEDAW is superior to national law, there ought to be.

Through its questions on compliance with CEDAW, the ABA document implicitly indicates that the CEDAW Convention endorses a series of controversial policy positions. These include (1) the concept of “comparable worth; (2) gender quotas for elected offices; (3) federal government sponsored revision of textbooks, the promotion of co-educational institutions and the elimination of all-male education institutions; (4) federal government action to promote shared parental responsibilities which includes government-sponsored “family education”; and (5) federal government action to promote parental leave for men.

In these issues the ABA document asks the following:

- On “comparable worth.”

Do women enjoy the right to equal remuneration (including non-monetary benefits) for work of equal value?

What enforcement mechanisms exist to ensure compliance with equal pay and equal evaluation of work laws in both the public and private spheres?

Are there policies and procedures established to prohibit discrimination in the evaluation of work performance? Have gender-neutral evaluation criteria been established?

Has the State undertaken any studies to calculate the value of work done by women in the non-monetized sector, including but not limited to agricultural work, domestic work, child and elder care, family education and health care?⁹

- On gender quotas for elected officials.

Has the State allocated funds to encourage female candidates to run for office?

Has the State Party expanded women's opportunities to vote by providing child-care facilities or transportation to conveniently located polling stations throughout the country?

Do gender quotas exist for increasing the number of women elected or appointed to government bodies? If so, how have they been implemented?

Do gender quotas exist to include a certain number of women on party lists or as party candidates?

What percentage of party members are women?

What percentage of party leaders are women?

Does the State track how many women run for publicly elected bodies?

Do voting rates differ between women in urban and rural areas?

If so, has the State introduced any special temporary measures to eliminate the gap?

Are female candidates guaranteed equal access to media outlets during their political campaigns as men?

Do they receive equal media attention? If so, what kind of media attention?

Does a negative perception about women's participation in politics exist?

If so, has the State undertaken a public information campaign to change people's negative perceptions about women's participation in politics?

Do public education campaigns conducted by the State emphasize the importance of a balanced representation of men and women in elected bodies?¹⁰

- On federal government sponsored revision of textbooks, promotion of all co-educational institutions, and the elimination of same sex education institutions.

Is co-education of boys and girls practiced in all areas of the State?

If not, what measures have been undertaken to encourage co-education throughout the State?

Has the State conducted a review of school curricula, textbooks and other materials at all educational levels to eliminate negative stereotyping of girls and women?

What measures has the State undertaken to review teacher training materials and curricula with the aim of eliminating gender stereotypes?

If so, has the State adequately staffed and funded these initiatives?

In secondary school curricula, does the teaching of the State's political history include the contributions of women political leaders and women's participation in historical events?¹¹

- On federal government action to promote shared parental responsibilities including government sponsored family education.

What measures has the State undertaken to ensure that family education includes the concept of shared responsibility of both parents in raising children? What measures has the State undertaken to encourage shared parental responsibilities?¹²

- On federal government action to promote parental leave for men

Is there paternity leave for fathers?

If so, what percentage of eligible men use it?

What measures has the State undertaken to encourage men's use of paternity leave where it exists?

Does the State support, financially or otherwise, social services that enable parents to balance family obligations with work responsibilities and participation in public life?

Is paternal leave available to men?

If so, what is the State doing to encourage men to use their paternal leave?¹³

Surely, it is clear that the “right” answers to the ABA’s assessment tool (that is, the answers that demonstrate that a nation is in compliance with CEDAW) are affirmative—“yes we do have gender quotas for elected officials”; “yes we do have government-funded paternity leave for men.” Moreover, if male-female ratio in any category is not near 50-50, “yes, we will institute ‘special temporary measures’ until this parity is achieved.”

Yet, none of the issues listed above (comparable worth, gender quotas, textbook revision, government promotion of shared parental duties, government promotion of parental leave for men) are serious human rights or women’s rights issues, such as voting rights or the end of female genital mutilation. Some, such as comparable worth, are controversial political issues about which there is much disagreement. Others have so little popular support that they have never even reached the stage of becoming serious political proposals (e.g., gender quotas for members of Congress). The remaining issues, for example, how families divide household and parental duties, are, questions, most Americans believe, that families should be able to determine for themselves without coercion from the U.S. federal government or the United Nations. If the American proponents of CEDAW are serious small “d” democrats they should be willing to play by the rules of our constitutional system. That is to say, they should attempt to enact their proposals through the normal process of American democracy, not claim these controversial proposals are “universal human rights” that should not be subject to democratic decision-making.

The work of the UN CEDAW Committee that monitors the Convention.

UN Human Rights Conventions such as CEDAW establish a committee of experts and advocates to monitor the progress of the State Parties towards compliance with the treaty. To understand how CEDAW is defined and works in practice it is necessary to review the actions of the CEDAW Committee that monitors the compliance of the nation-states. Listed below are some highlights of the work of the CEDAW Committee in monitoring the compliance of six fully functioning advanced democracies. To better understand what American compliance with CEDAW would mean, we choose to review only the CEDAW Committee’s response to democratic nations.

● United Kingdom of Great Britain and Northern Ireland.

The CEDAW Committee admonished the British because they appeared to prefer equality of opportunity and equality under law to “substantive equality” or equality of result or outcome. Thus, the CEDAW Committee “notes with concern, however, that varying levels of public understanding of the concept of substantive equality have resulted in the promotion of equality of opportunity and of same treatment only.” The CEDAW Committee told the British to “implement awareness raising and education campaigns” to explain the “meaning of substantive equality that goes beyond equality of opportunity” to equality of outcome. To do this it would be necessary for the British to develop “appropriate mechanism and capacity to monitor implementation, evaluate results achieved, and ensure accountability.”¹⁴

● France.

The CEDAW Committee complained that despite France’s gender parity law which required 50% gender quotas for party candidates in local elections—the Committee was still concerned with the “under-representation of women in high-level positions in public sectors...in academia, and in the private and business sectors.”¹⁵ Moreover, the CEDAW Committee called on France to curb the “wage gaps” between men and women by “financial sanctions” against companies, “that did not have a plan to redress wage inequalities.”¹⁶

● Germany.

The CEDAW Committee told Germany to introduce government subsidized non-transferable child raising leave to fathers. The reason for this was that the Committee was displeased that so few German fathers were using parental leave under the voluntary arrangement.¹⁷ Thus, the CEDAW Committee demanded to know: “Has the Government conducted a study on why fathers are so reluctant to take parental leave?”¹⁸ Further, the Committee insisted upon knowing “what measures” the German government was “envisaging to counteract such realities.”¹⁹

● Ireland.

The CEDAW Committee told the Irish to “genderproof” their budget and allocate more budgetary funds for women’s concerns. Ireland was also informed by the Committee that “it was important” for the republic that all the UN Human Rights Treaties (including CEDAW, the Rights of the Child, the Convention for the Elimination of Racial Discrimination, and the Convention for Civil and Political Rights be incorporated into domestic law.²⁰

● Israel.

The CEDAW Committee admonished the Israelis because their public health services allocated considerable resources to *in vitro fertilization*, but contraceptives were not free. The Committee also told the Israelis to develop programs to provide for the “gender sensitization of the judiciary, police, and health professionals.”²¹ Eight years later, the CEDAW Committee reported that it “remained concerned about the low level of representation of women” in local authorities. The Israelis were told by the CEDAW representatives to “take sustained measures, including

temporary special measures in accordance with article 4, paragraph 1 of the Convention...and to establish concrete goals and timetables” to increase the “representation of women, including Israeli Arab women in elected and appointed bodies in all areas of public life.”²²

● Australia.

The CEDAW Committee complained to the Australians that although they had ratified the treaty, they had attached reservations to that ratification that restricted women in military combat units. The Committee also objected to what it defined as “disproportionate budget cuts” on programs effecting women. In addition, the Committee admonished Australia for failing to provide federally funded state maternity leave.²³ Nine years later, the Committee “welcomed” Australian legislation that provided for paid maternity leave for federal government workers but complained that there was no “national system of paid maternity leave” that would require the states, territories, and private sector to act.²⁴

The activities of the CEDAW Committee’s country monitoring reports reveal that the tone of the ABA Assessment Tool is essentially accurate in anticipating what constitutes “compliance” with the CEDAW Convention. Both the ABA document and the results of the CEDAW Committee’s monitoring of democracies demonstrate that the UN Women’s Convention is extremely problematic in both principle and practice.

The overarching principle behind CEDAW is substantive equality, or ascribed group-based equality of outcomes, enforced by government bureaucracies. That is, equality of result based on the group that one is born into. This is antithetical to the traditional American concepts of equality of opportunity and equality under law, without regard to race, sex, ethnicity, or religion. In fact, the CEDAW representatives specifically criticize equality of opportunity and equality under law as inadequate. Americans spent a good part of the last century fighting ideologies and movements that promoted (although they didn’t practice) substantive equality, there is no reason to embrace this false principle today.

In practice, compliance with the type of substantive or de facto equality promoted by the CEDAW Committee means massive government-bureaucratic intrusiveness into every aspect of national life—politics, economics, health, family, religion and social policy. This is clearly shown by the Committee’s attempted interference in how democracies deal with such issues as: the ratio of funds spent on *in vitro* fertilization as opposed to contraceptives; government “measures” to “counteract” the reluctance of fathers to use parental leave; “financial sanctions” against companies that have not instituted comparable worth pay rates based on gender; the political question of whether or not women should serve in military combat roles; and government programs for the “gender sensitization” of judges.

The Issue of Enforcement.

It is often noted by the proponents of the treaty that the CEDAW Committee has no enforcement authority. If the treaty is not self-executing, the argument runs, Congress would have to enact legislation to implement CEDAW. Nevertheless, as American Enterprise Institute scholar Christina Hoff Sommers recently noted the ratification of CEDAW is sure to have an effect on

policy development in the U.S. Many lawsuits will be brought arguing that the U.S. is not in compliance with CEDAW on this or that issue. Sommers argues that given “the official nature of the [CEDAW] committee, and the legal authority conferred upon it by the international community... its judgments would become a powerful persuasive force.”²⁵ Further, “CEDAW would serve as an impetus and a justification for judges to make radical new ruling in cases touching on gender issues.”²⁶

Massive Litigation.

Indeed, as the ABA document suggested, the ratification of CEDAW would lead to massive litigation with activist-special interest groups filing law suit upon law suit in an attempt to achieve equality of outcome through judicial means because they have been unable to achieve this goal legislatively through the democratically elected Congress.

RUDs, Reservations, Understandings, and Declarations will have little meaning.

Nor will the inclusion of any “Reservations, Understandings, and Declarations (RUDs) to America’s ratification matter. As Professor Sommers remarks, “The legitimacy and role of ‘reservations’ in international human rights treaties is one of the most contested areas of international law. Legal experts disagree about the power of RUDs to insulate a country from provisions of a treaty if has committed itself to honor. CEDAW itself states, ‘A reservation incompatible with the object and purpose of the Convention shall not be permitted.’”²⁷ Further, she notes, “as NOW...reported on its website in August 2009, ‘Representatives from groups who have advocated for ratification over the years suggest that RUDs have little meaning and could potentially be removed from the treaty at some point.’”²⁸

CEDAW process undemocratic in principle and antithetical to a free society..

At the end of the day, the CEDAW process itself is at odds with core American democratic principles because the role of the CEDAW monitors (1) distorts the democratic decision-making process and (2) because these UN monitors seek to limit both the scope of democratic self-government and the role of civil society and private life. The CEDAW Committee is a foreign body that takes sides in favor of one political group and against another political group within a democratic state in which it has neither citizenship nor any type of democratic accountability. We saw at the beginning of this testimony how the CEDAW Committee took sides in Slovenia for one political group and against the pro-family forces. In the US, upon ratification of the treaty, it is clear that the CEDAW Committee will work hand and globe with some domestic special interest groups (e.g., NOW and other supporters of expanded government) and, at the same, oppose other domestic actors (e.g., pro-family groups, private sector advocates, budget limiters and others). Thus, the CEDAW monitors would interfere in and distort our internal democratic process.

Worse still, the CEDAW Committee would not simply “take sides” in American politics, but would work actively to limit American democratic decision making by taking political issues out of the hands of elected officials and transform them into “universal human rights,” to be determined by judges on the basis of the “evolving norms of international law.” Further, the

CEDAW process (as we have discussed continuously in this testimony) seeks to limit the scope of individual action within civil society, the free-market economy, and even private life itself. In short, CEDAW is not a benign treaty that Americans could accept in any form (with or without the ineffective reservations that have been suggested), but is anathema to American democracy and our free society.

¹ See American Bar Association Central and East European Law Initiative (CEELI), *The CEDAW Assessment Tool: An Assessment Tool Based on the Conventional to Eliminate All Forms of Discrimination Against Women (CEDAW)*, The Right Consortium, Funded by USAID, January 2002, contact ABA CEELI, 740 15th St. NW, 8th Floor, Washington, DC 20005-1022. Hereafter referred to as ABA Tool.

² ABA Tool, p. 16.

³ *Ibid.* p. 16.

⁴ *Ibid.* p. 16.

⁵ *Ibid.* p. 82.

⁶ *Ibid.* p. 82.

⁷ *Ibid.* p. 79.

⁸ *Ibid.* p. 80.

⁹ *Ibid.* p. 95.

¹⁰ *Ibid.* pp-87-88.

¹¹ *Ibid.* p. 92

¹² *Ibid.* p 85.

¹³ *Ibid.* p.97

¹⁴ U.N. General Assembly , 63rd Session. Report of the Committee on the Elimination of Discrimination Against Women: 40th (14 January-1 February 2008) and 41st (30 June-18 July) Sessions. Supp No. 38 (A/63/38). Official Record. New York, 2008.

¹⁵ U.N. Committee on the Elimination of Discrimination Against Women. 40th Session. Convention on the Elimination of All Forms of Discrimination Against Women: *Concluding comments of the Committee on the Elimination of Discrimination Against Women: France (CEDAW/C/FRA/CO/6)*. 14 January-1 February 2008.

¹⁶ *Ibid.* p.5.

¹⁷ U.N. Committee on the Elimination of Discrimination Against Women. 30th Session. Pre-Session Working Group for the 30th Session. *List of Issues and Questions With Regard to the Consideration of Periodic Reports, Germany (CEDAW/PSWG/2004/I/CRP.I/Add.3)*. 12-30 January 2004.

¹⁸ *Ibid.*

¹⁹ *Ibid.*

²⁰ U.N. Press Release, “Committee on the Elimination of Discrimination Against Women Begins Consideration of Report on Ireland.” (Press Release WOM/1142). 21 June 1999.

²¹ U.N. Committee on the Elimination of Discrimination Against Women. 17th Session. U.N. Convention on the Elimination of Discrimination Against Women. *Concluding Comments: Israel* (excerpted from A/52/38/Rev.1). 25 July 1997.

²² U.N. Committee on the Elimination of Discrimination Against Women. 33rd Session. U.N. CEDAW. *Concluding Comments: Israel* 5-22 July 2005.

²³ U.N. Committee on the Elimination of Discrimination Against Women, 17th Session CEDAW. *Concluding Comments: Australia* 25 July 1997.

²⁴ U.N. Committee on the Elimination of Discrimination Against Women, CEDAW. *Concluding Comments: Australia*, 2006.

²⁵ Christina Hoff Sommers, “The Case against the U.N. Women’s Treaty, National Review Online, November 16, 2010.

²⁶ *Ibid.*

²⁷ *Ibid.*

²⁸ *Ibid.*