



To: UN Committee on the Rights of Persons with Disabilities

From: [NRWC](#) - written by Judy Harrison

Subject: **Input on Draft Guidelines on identifying and addressing intersectional discrimination against women and girls with disabilities**

Date: 29 June 2026 / 5 August 2026 (typos removed)

1. Introduction

1. The Committee on the CRPD (**the Committee**) is consulting on three draft General Comments (**DGCs**) and two Draft Guidelines (**DGs**) including the current DG-I (**‘the five 2026 drafts’**) detailed at **Table 1** below.
2. This input relates to the [DG on identifying and addressing intersectional discrimination against women and girls with disability](#) (‘DG-I’). Separate input relates to [DG - identifying and addressing disability-based violence](#) (**DG-DBV input**).
3. It is requested that the following be treated as input on the five 2026 drafts:
 - the current input on DG-I
 - the DG-DBV input including ‘3. Additional Issues’.
 - [NRWC input](#) (including para 31-33 recommendations) regarding the [CEDAW Committee on draft General Comment 41 – Gender Stereotypes](#).
4. This input consists of this Introduction, Response to the text and Tables 1-5.
5. Terms:
 - ‘women’ is used for women, girls and adolescents unless indicated otherwise.
 - ‘rural, remote, maritime and other non-urban areas’ is used, like language in para 8 of the [CSW70 agreed conclusions](#) namely ‘women and girls in rural,

remote and maritime areas'. The language nuance aims to avoid essentialising non-urban areas as functionally 'rural'.

Adjust to address RRM+

6. It is submitted that DG-I be adjusted to:
 - address intersectional discrimination against women with disabilities in remote, rural, maritime and other non-urban areas (**RRM+**) as **a cross-cutting theme**, and
 - elaborate on this by **addressing formal, substantive, direct and indirect discrimination** relevant to **intersectional discrimination** against women with disabilities relating to RRM+ areas throughout DG-I.
7. Intersectional discrimination against the diversity of women with disability related to - and in - their RRM+ locations, is currently poorly addressed by DG-I which:
 - does not describe the patterns about where women disabilities in all diversity live in the world in relation to urban and RRM+ areas
 - only makes passing reference to 'rural' in paras 5, 17 (discussing intersectionality and CEDAW) and para 39 (about health inequality), and
 - does not conceptualise or address discrimination, including intersectional discrimination, relating to place of residence or location in RRM+ areas.

Review written inputs

8. The [Committee's call for written inputs](#) (closed Nov 25) included asking:

'- which groups of women and girls with disabilities face the greatest risks of multiple and intersectional discrimination? For example: - Women and girls with disabilities living in rural or remote areas'.

Although 'rural or remote' was not made visible in the other seven questions for input – about 81 of the [143 published inputs](#) raised concerns related to rural and/or remote areas. Together these inputs highlighted unaddressed, discriminatory, intersectional barriers and disadvantage which are failing the human rights of women disabilities in RRM+ areas. For example the [Colombian Coalition for Implementation of the CRPD](#) outlined (bold added):

'The first evidence of intersectional discrimination is found in rural areas, where territorial marginalization dramatically exacerbates inequalities related to gender and disability. It is not simply that these women live far from urban centers; **they face a triple structural barrier: being women, having a disability, and inhabiting territories systematically neglected by the state.**

According to ECLAC, in Latin America, rural women with disabilities have higher rates of **illiteracy**, **unemployment**, and **poverty** than rural women without disabilities or than men in the same group.

This exclusion occurs due to everyday elements that constitute structural barriers. Thus, women with disabilities in rural areas lack access to **health services**, inclusive and quality **education**, **justice**, and even **employment**. This lack of state infrastructure is exacerbated by the absence of accessible **transportation** that could bring these services closer to them. This isolation contributes to a **lack of awareness of their rights** and a **lack of opportunities**, creating environments of **economic dependence** and **vulnerability to domestic violence**. As ECLAC summarizes: "**Rural women with disabilities face accumulated exclusion based on gender, disability, and territory, which marginalizes them from public and political life.**"

On the other hand, **belonging to ethnic or racial minorities** adds a complex cultural and structural dimension. **Racism, sexism, and ableism** operate simultaneously here, creating an exclusion described by the CEDAW Committee, since they "**are made invisible within their communities and marginalized in society at large.**" The case of **Indigenous women with disabilities** dramatically illustrates this intersection, due to their linguistic and cultural exclusion. The **absence of interpreters** and the **lack of culturally sensitive care** render **hospitals, schools, and courts** inaccessible to them."

Reflect that CRPD applies to persons with disability in RRM+ areas

9. The CRPD refers to accessibility in urban and rural areas (Art 9), that health services must be provided 'as close as possible to people's own communities, including in rural areas' (Art 25), and that support for participation and inclusion in the community and society must be available including in rural areas (Art 26).
10. However, *the whole CRPD* applies to the full diversity of people with disabilities in RRM+ areas including women, unless specifically inapplicable. This is like how 'rural' operates in CEDAW: CEDAW Committee [GC 36 – rights of rural women](#). This approach regarding the CRPD should be reflected in DG-I.

Place of residence

11. The Preamble to CRPD para (p) expresses concern about forms of discrimination, stating as follows (the added **bold** means the only reference to this basis in the CRPD):

“(p) Concerned about the difficult conditions faced by persons with disabilities who are subject to multiple or aggravated forms of discrimination on the basis of **race, colour, sex, language, religion, political or other opinion, national, ethnic, indigenous or social origin**, property, birth, age or **other status**,”
12. While the CRPD does not elaborate on 'other status' the CRPD Committee recognises 'other status' includes 'place of residence' or similar e.g.:

- CRPD [GC No. 8](#), Art 27: Work and Employment - para 4.
- CRPD [GC No. 5](#) (2017) Art 19: Right to independent living - para 9 refers to ‘right to choose one’s residence’, para 10 to ‘freedom to choose residence and domicile’; paras 16(a), 24, 39, 46, 47 and 72 refer to place of residence.
- CRPD [Draft GC 9](#) The obligation of States parties in situations of risk, including armed conflict, humanitarian emergencies and the occurrence of natural disasters - para 14.
- CPRD [Draft GC on Art 29](#) (2026) CRPD - right of persons with disabilities to participation in political and public life - para 56.

13. The CESCR Committee has noted estimates that 80% of people with disability in the world live in rural areas ([GC 5 \(1994\)](#)), and has similarly recognised ([GC 20 \(2019\)](#)) that ‘other status’ includes:

“Place of residence

34. The exercise of Covenant rights should not be conditional on, or determined by, a person’s current or former place of residence; e.g. whether an individual lives or is registered in an urban or a rural area, in a formal or an informal settlement, is internally displaced or leads a nomadic lifestyle. Disparities between localities and regions should be eliminated in practice by ensuring, for example, that there is even distribution in the availability and quality of primary, secondary and palliative health-care facilities.”

Intersectionality

14. A *triple structural barrier* (para 7 above) resonates with *breaking triple layers of discrimination*, [Professor Megan Davis](#) called for in 2015 when Chair of the Permanent Forum on Indigenous Issues, referring to indigenous women in rural areas:

“They are discriminated as women. They are discriminated as indigenous. And they are discriminated as rural.”

Each dimension may reflect intersecting means of discrimination. This can include “geographic based discrimination (urban v remote)” ([Wiyi Yani U Thangani Report](#) 2020 p. 74).

15. In the case of [Susana v Nicaragua \(2024\)](#), the Human Rights Committee found 9 articles of the ICCPR were violated and that:

“the facts of the present communication also disclose a form of intersectional discrimination based on the author’s gender, her age and the fact that she lived in poverty in a rural [area].”

Discrimination to be formally and substantively eliminated

16. Discrimination must be eliminated both formally and substantively, including in rural areas. For example the CESCR Committee expressed in [GC 20 \(2019\)](#) that (bold added):

“8. In order for States parties to “guarantee” that the Covenant rights will be exercised without discrimination of any kind, discrimination must be eliminated both formally and substantively:

(a) Formal discrimination: Eliminating formal discrimination requires ensuring that a State’s constitution, laws and policy documents do not discriminate on prohibited grounds....;

(b) Substantive discrimination: Merely addressing formal discrimination will not ensure substantive equality as envisaged and defined by article 2, paragraph 2.8 The effective enjoyment of Covenant rights is often influenced by whether a person is a member of a group characterized by the prohibited grounds of discrimination. Eliminating discrimination in practice requires paying sufficient attention to groups of individuals which suffer historical or persistent prejudice instead of merely comparing the formal treatment of individuals in similar situations. States parties must therefore immediately adopt the necessary measures to prevent, diminish and eliminate the conditions and attitudes which cause or perpetuate substantive or de facto discrimination. For example, ensuring that all individuals have equal access to adequate housing, water and sanitation will help to overcome discrimination against women and girl children and persons living in informal settlements and **rural areas.**”

2. Response table to text of Draft Guideline

Headings of DG-I	Input
Chapter 1: Intersectional discrimination against women, adolescents & girls with disabilities	The Introduction (above) is the first part of the input on the Draft Guideline. This section elaborates on the text. Tables 1-5 in part 3 give more background.
I. Introduction (para 1-4) II. Scope and interpretation (paras 5-6) (preliminary)	- Para 1 refers to the Committee’s GC No 3 (2016) on women and girls with disabilities and GC No. 6 (2018) on equality and non-discrimination and facilitate their interpretation and implementation. - There is only one reference to ‘rural’ in each of these GCs and neither reference is expressed as a cross-cutting theme. - GC3 only refers to ‘rural’ about communication technologies and GC6 only refers to ‘rural’ regarding consultation. Tables 1-5 outline drafting patterns in the CRPD GCs, Guidelines (GU) and the five 2026 drafts, including the current draft GU. There is insufficient visible, intersectional and effective treatment of people with disability, including women, in RRM+ areas. This is part of the context to be addressed in the current Guideline. - The <i>Introduction</i> and/or <i>Scope and interpretation</i> should

	outline the estimated number of women, adolescents and girls with disabilities in the world, likely proportion in RRM+ areas and in urban areas to highlight to introduce this as a cross-cutting theme. It is recommended that the Committee adopt this practice with all future Guidelines and General Comments.
I. Scope and interpretation (continued)	- For reasons above and below RRM+ areas, place of residence and geographic location should be specifically reflected and sufficiently conceptualized. - This is not achieved by para 5: 2nd sentence relates to multiple and intersecting discrimination on prohibited grounds. This contains semi-alphabetical lists, it includes 'region' but does not include 'place of residence' within a country or RRM+ location. 3rd sentence refers to submissions received which shed light on discrimination on account listed status consisting of a list of 20 in semi-alphabetical sequence including 'rural' (15th). - The drafting and conceptual approach to RRM+ areas should be reworked. RRM+ areas: - are the majority of the world's landmass - are the location of the majority of the multidimensionally poor - are the location of the majority of the world's Indigenous people - have higher prevalence of disability than urban areas, and - are locations of profound human rights shortfalls, including and especially for women with disabilities See the submission on DG -disability-based violence for references.
II. Sources (para 7-19)	<i>Sources</i> - aims to relate to intersectional discrimination and to "structural and compounded discrimination in law and in practice and .. the interpretation of discrimination as arising from the interaction of multiple protected characteristics." - Para 7 (preparatory) and paras 8-16 and 18-19 do not reflect prohibited discrimination based on place of residence or location, including RRM+ areas.

	○ Addressing this is critical for countering the status quo and increasing duty-bearer and collaborative accountability for the human rights of women with disability in RRM+ areas. ● Sources should include addressing direct and indirect discrimination, mixed and intersectional discrimination against women with disabilities in RRM+ areas. ● Paras 13 and 14 refer to: ○ Z v Tanzania where the CRPD Committee found violations of 6 Articles; substantive issues: “Albinism; discrimination based on disability; torture, inhuman and degrading treatment; violation of the right to respect for intellectual and mental integrity” ▪ Z was a 28-year-old woman from a small village who had been working as a farmer who lost her livelihood from her disabling injuries. ○ Bellini v Italy, where the CRPD Committee found violations of multiple Articles. The author (complainant) served as President of the National Coordination of Families with Disabilities. ▪ Regarding Italy recent research indicates significant regional variations in rates of child disability and recommends geographic targeting in response. ● Para 16 refers to HRC jurisprudence but gives narrow range examples, at least one should show intersectional treatment of rural / place of residence / location or RRM+ contextual considerations e.g. the case of Susana v Nicaragua (2024) (above). ○ Amanda Lyon’s article, Rurality as an Intersecting Axis of Inequality in the Work of the U.N. Treaty Bodies (2022) could be referenced here and/or elsewhere. ● Para 17-19 about the CEDAW Committee: ○ Refers to Kell v Canada regarding a First Nations women in an isolated Northwest Territories community; the recommendations included that Canada “Recruit and train more aboriginal women to provide legal aid to women from their communities, including on domestic violence and property rights;’ This speaks to systemic, structural and resource
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	dimensions intersectional to Indigenous, women, and RRM+ location. ○ Also refers (paras 18, 19) to some other decided cases - their fact situations could also be anticipated in RRM+ areas where RRM+ location, and duty-bearer responses to location, are often an additional intersectional factor.
IV. Intersectional discrimination against women and girls with disabilities (para 20-24)	• Para 20 outlines grounds of discrimination but these: ○ are not well developed in relation to RRM+, and ○ do not match para 5, e.g. ‘rural’ is in para 5 but not para 20 and ‘disability’ is in para 20 but not para 5. • Para 21 gives an intersectional example which could have RRM+ location added. • Para 22 outlines that “intersectional discrimination is structural in nature. Its root causes lie in the interconnected social, cultural, familial, economic, religious, political, historical and psychological relations within society, which are shaped by power.” ○ However, this and para 23 should include how forms of power engage spatially, geographically, politically, historically, economically and in other ways in relation to people and populations in RRM+ areas, often with inequitable and discriminatory effects. ○ This includes: ▪ withholding necessities for human rights and wellbeing ▪ often adversely impacting and discriminating women with disabilities, children and others with disabilities in differentiated or similar ways; and in multiple and compounding ways.
Chapter II: Differentiated impacts arising from intersectional discrimination against women, adolescents and girls with disabilities	• Paras 25-27 are introductory, they do not (but should) reflect spatial, geographic, locational and place of residence discrimination. • Para 26 states that input from written submissions is reflected but the nature and extent of input in those submissions about RRM+ areas is not yet reflected (see para 7 above in this input).
I. Freedom from violence, exploitation and abuse to IX Climate change (paras	• In combination the headings indicate this Chapter engages with Art. 4-9, 11-12, 14, 16-17,19, 21,23-25, 27-29.

28-59)	• Currently across paras 28-59 there is one reference to rural areas which is about rural health inequalities (para 39). • All paragraphs should be revised to reflect issues for women with disabilities in RRM+ areas.
Chapter III: Identifying and addressing multiple and intersecting forms of discrimination in law, policy and practice (paras 61-84)	• While the headings in Chapter III (shown below) deal with critically important issues, there is no engagement in Chapter III with RRM+ location. I. Identification of intersectional discrimination II. Early intervention / preventative measures III. General legal and policy framework IV. Sectoral policies • This means no recommendations are included about how laws, interventions, legal and policy frameworks or sectoral policies can properly support the human rights of the diversity of women with disabilities in RRM+ areas. • The Chapter should be reworked for human rights inclusion of women with disabilities in RRM+ areas including: ○ non-discrimination based on RRM+ location and place of residence, and ○ visible and effective inclusion in all relevant policy frameworks.

3. Tables

Tables 1-5 – starting next page

Table 1: 'Rural' in CRPD General Comments, Guidelines and five 2026 drafts

'Rural'	After CEDAW Comm. Gen. Statem. on rural women (2011) ¹				Since CEDAW Committee Gen Rec. No 34 (March 2016) on the rights of rural women													
	2014			2015	2016	2017	2018		2022	2022	Total	2026	2026	2026	2026	2026	Total	Total ²
Year	GC1	GC2	GC3	GU	GC4	GC5	GC6	GC7	GC8	GU	14-22	DGC9	DGC10	DGC#	DG-GBV	DG-I	2026	2014-26
Occurrences																		
> 5											0						0	0
5											0					5	1	1
4		4						4			2						0	2
3											0						0	0
2						2					1						0	1
1			1				1		1	1	4				1 ³		1	5
0	0			0	0						3	0	0	0			3	6

Terms: GC=General Comment;⁴ GU=Guideline;⁵ DG = Draft General Comment;⁶ DG=Draft Guideline⁷

Table 2: First reference to 'rural' by paragraph number

'Rural'	After CEDAW Comm. Gen. Statem. on rural women (2011)				Since CEDAW Committee Gen Rec. No 34 (March 2016) on the rights of rural women										
	2014			2015	2016	2017	2018		2022	2022	2026	2026	2026	2026	2026
Year	GC1	GC2	GC3	GU	GC4	GC5	GC6	GC7	GC8	GU	DGC9	DGC10	DGC#	DG-GBV	DG-I
1 st ref to 'rural' (para number)	-	13	48	-	-	35	33	50	26	101	-	-	-	66 ⁸	5
Number of paras	52	48	65	24	76	97	73	94	82	143	71	51	70	121	84
% of the way through	-	46%	74%	-	-	36%	45%	53%	32%	71%	-	-	-	55% or none	6%

¹ Also to note CEDAW Committee [General Rec. No 16 \(1991\) Unpaid women workers rural and urban enterprises](#) – regarding reporting, statistics and actions.

² Total is the frequency total for 2014-2022 plus the frequency total for 2026.

³ Refers to 'rural' location only in a vignette where the relevance of 'rural' location is not identified.

⁴ [Online](#).

⁵ CRPD, [Guidelines on the right to liberty and security of persons with disabilities](#) in Annex to the Committee's Bi-Annual Report 2016, General Assembly A/72/55; CRPD, [Guidelines on deinstitutionalization, including in emergencies](#), (2022) CRPD/C/5.

⁶ [Draft General comment No. 9](#) - The obligation of States parties in situations of risk, including armed conflict, humanitarian emergencies and the occurrence of natural disasters; [Draft General comment 10](#) - Addressing the Impacts of Situations of Risk and Humanitarian Emergencies in relation to Article 11 of the Convention ; DGC# is [Draft General Comment on article 29 of the Convention on the Rights of Persons with Disabilities \(right of persons with disabilities to participation in political and public life\)](#).

⁷ Draft Guidelines [on identifying & addressing disability-based violence](#); and [on identifying & addressing intersectional discrimination against women & girls with disabilities](#).

⁸ Refers to 'rural' as location in a vignette where the relevance of 'rural' location is not identified, if counted = 55% if not counted = none.

Table 3: ‘Rural’ in word count CRPD General Comments, Guidelines and five 2026 drafts

‘Rural’	After CEDAW Comm. Gen. Statem. on rural women (2011)				Since CEDAW Committee Gen Rec. No 34 (March 2016) on the rights of rural women													
	2014			2015	2016	2017	2018		2022	2022	Total ⁹	2026	2026	2026	2026	2026	Total	Total
Year	GC1	GC2	GC3	GU	GC4	GC5	GC6	GC7	GC8	GU	14-22	DGC9	DGC10	DGC#	DG-GBV	DG-I	2026	2014-26
GC/CU/Drafts																		
Word Count ¹⁰	7356	8126	8792	3297	11220	11025	10730	10776	11283	10712	93317	7634	8156	11433	12448	10157	49828 ¹¹	143145 ¹²
‘Rural’ occurrences	0	4	1	0	0	2	1	4	1	1	14	0	0	0	1 ¹³	5	6	20
% ‘rural’ / words	0	0.049	0.011	0	0	0.018	0.009	0.037	0.009	0.009	0.015	0	0	0	0.008	0.049	0.012	0.014

Table 4: Highest to lowest occurrences of ‘rural’ as a % of the word count

Highest to lowest	% ‘rural’		Year
1	0.049	DG-1	2026
	0.049	GC2	2014
2	0.037	GC7	2018
3	0.018	GC5	2017
4	0.011	GC3	2024
5	0.009	GC6	2018
	0.009	GC 8	2022
	0.009	GU	2022
6	0.008	DG-GBV	2026

⁹ Total occurrences of ‘rural’ 2014-2022

¹⁰ MS Word, Word Count of whole text including headings, any textboxes, footnotes and any endnotes.

¹¹ Total occurrences of ‘rural’ in 2026 drafts

¹² Total occurrences of ‘rural’ 2014-2026

¹³ Refers to ‘rural’ location only in a vignette where the relevance of ‘rural’ location is not identified.

Table 5: ‘Rural’ in CRPD General Comments, Guidelines & 2026 Drafts

‘Rural’			Relates to	‘Rural’ cross-cutting across the GC/GU/DGC/DGU?
GC2	4 ¹⁴	- Under II. Normative content - Para 13 - Para 16	Art 9 accessibility	No
GC3	1	- Under IV. Relationship between article 6 & other art. of the Convention, subhead. ‘Accessibility (art. 9)’ - Para 48	Relates to relationship between Art 6 (women with disabilities) and Art 9 (accessibility)	No
GC5	2	- Under II. Normative content of article 19, sub-para ‘E. Art 19(c)’, - Para 35 - Under III. Obligations of States parties, subheading ‘C Obligations to fulfil’ - Para 63	- Para 35 relates to Art 19 Living independently and being included in the community - Para 63 is one of the sections of the GC (I.-V.), namely III. Obligations of States parties.	No
GC6	1	- Under VI. General obligations of States parties under the Convention relating to non-discrimination and equality, - Para 33	Para 33 relates to consultation obligations under the Convention	No
GC7	4	- Under III. Obligations of States parties, - Para 45 - Para 50 - Under heading IV. Relationship with other provisions of the Convention - Para 87 - Para 91	GC7 is about the participation of people with disabilities including children through their representative organizations in the implementation of the Convention and references to ‘rural’ in paras 45 and 50 relate to obligations for inclusion of people in rural areas; 87 emphasizes specific focus on rural areas in relation to living standards and social protection; para 91 relates to statistical disaggregation.	No
GC8	1	- Under II. Human rights model of disability - Para 26	Para 26 relates to conditions at work, including in rural and remote areas - being among the many issues addressed in the GC	No
GU 2022	1	- Under VII. Access to mainstream services on an equal basis with others, - Para 101	Para 101 relates to access to transport and use of public space - being among the many issues addressed in the GC	No
DG-GBV 2026	1	Under V. Context and forms of disability-based violence ‘J. Violence and harassment, including sexual harassment in work and employment’,	‘Rural’ in para 66(b) is part of a vignette where the relevance of ‘rural’ is not indicated	No

¹⁴ Occurrences of ‘rural’ shown in this column.

		○ Para 66 (b)		
DG-I 2026	5	• Under II Scope and interpretation ○ Para 5 ○ Para 17 (twice) • Under heading III. Bodily autonomy, sexual and reproductive rights, respect for the family (articles 6, 12, 17, 22, 23, 25) ○ Para 39	• Para 5 contains list about multiple and intersecting discrimination on prohibited grounds – doesn't include place of residence, rural; para later refers to 20 'other status' from submissions, 'rural' is listed 15th. • Para 17 refers to CEDAW regarding intersecting forms of discrimination including in relation to rural women, differentiated impact of discrimination on rural women and the CEDAW Committee's treatment of intersectionality on the rights of rural women based not only on gender but on intersecting grounds. • Para 39 refers to health inequity in remote and rural areas.	• No