

Dear UN Commission on the Status of Women.

I am writing to you as a woman living in Iceland. I want to bring to your attention how gender identity policies are conflicting with the sexed based rights of women and girls in my country.

In the years 2019-2020 Iceland implemented a law that states that any person over the age of 15 years can self determine their legal sex/gender according to felt gender identity. In Icelandic law, the scientific term of biological sex is now redefined with unscientific terms that conflict biological sex and gender identity.

In Icelandic, the word "kyn" means biological sex but is now defined in law as: ***" A collective term that "amongst other things describes the sexual phenotype, gender, gender identity and gender expression"***

The ***"other things"*** in the sentence above are never defined in the law but the ***"sexual phenotype"*** is rightfully defined in the law as: chromosomes, hormones, sex-organs, and gonads.

This new definition in the law has made the terms woman and man meaningless. Women in Iceland as elsewhere face sex-based oppression and violence and this legislation totally erases their lived experiences and belittles their value as human beings.

In fact, the law is now defining gender and gender expression, meaning sex-based/gender-based stereotypes, as something that makes one a woman or a man. The Icelandic law goes further than most where sex-based stereotypes are now even interchangeable with the objective reality of being of the female or male sex which is scientifically incorrect.

The CEDAW rightfully recognizes the harms of gender stereotypes and gender stereotyping and has come to the conclusion that wrongful gender stereotyping is a pervasive human rights violation and that it is a frequent cause of discrimination against women and a contributing factor in violations of rights ranging from the right to an adequate standard of living through to the freedom from gender-based violence.

I hope the Commission on the Status of Women can see the serious threat to the human rights of women and girls when wrongful gender/sex-based stereotypes have in law become the basis of what makes one a woman and even a female.

I also want to point out that this legislation goes against the [CEDAWs recommendations to Iceland issued 10. March 2016.](#)

It says: "The committee is concerned about the continuing existence of stereotypes regarding the roles of men and women in the family and society that have a negative impact on women's position and opportunities, especially in education and the labour market."

The committee recommends that Iceland should: *"enhance awareness-raising through the media and implement measures to eliminate stereotypes and structural barriers that might deter boys and girls from enrolling in non-traditional educational and occupational choices or impede women's advancement in academic institutions, the labour market, the family and society."* (see paragraphs 17. and 18.)

According to the Icelandic legislation, any male can send in paperwork to the authorities and thereby be recognized in law as a woman and instantly gain all the legal rights an Icelandic woman has. It means in theory that males can now access all female-only spaces, compete in the female category in sports, take seats that were labeled for females in politics and on corporate boards. Women are not allowed to organize separately and away from male-born people.

We are as of now beginning to see how the authorities interpreted the law according to the statements I make above. Before our eyes and without any meaningful consultation with Icelandic women theory becomes the practice!

I want to take the example of the situation in locker rooms and changing areas in the swimming pools as it is such a clear example of how women's rights to safeguarding, dignity, and privacy come second to the feelings of male people.

In Iceland, we have a long tradition of outdoor swimming pools. There are multiple swimming pools in Iceland and there are separate changing areas for men and women. It is mandatory to shower and wash naked and there are no stalls for privacy. In recent years the city of Reykjavik has also offered Uni-sex changing rooms with stalls for those that need them. So everybody can go swimming and there is no lack of access for male people that feel uncomfortable in the male changing room.

Despite this, the city of Reykjavik has in 2021 made an official statement that any person that identifies as a woman can use the women's changing rooms. The city council has had a mandatory educational course for the swimming pool staff on how to diminish and belittle women's complaints when they have been forced to shower naked with a male with a penis. I would say this is a course in gaslighting but you can judge for yourself [here](#):

If you are English speaking you can use google translate to get the picture but it basically totally disregards the need women have for female-only spaces when they are naked and vulnerable. All various reasons like: *I am uncomfortable, I feel unsafe, I have small children with me, I am a victim of sexual violence and traumatized, I can not be naked with men because of religious reasons*, and so on are blown off almost as these concerns too are unlawful.

The council refers to the legislation again and again. If you have changed your legal sex/gender you have a right to shower naked with women and girls. I just want to make clear that according to the swimming pool rules a 10-year-old child can go swimming unaccompanied by an adult. The Icelandic authorities are promoting a major safeguarding issue where a 10-year-old female could happen to stand alone in a shower with a 30-year-old male with an intact penis. The authorities in Reykjavik have plans to implement this policy in all the city's schools, sport-clubs, and public buildings. You can read more about their views and plans in this [article](#) that is in English.

The law is meant to be inclusive but becomes exclusive to women and girls. I am in contact with a large network of women from various classes and political groups and I don't know a single one that is comfortable with the situation. The most serious thing in all of this is that not a single one of the women I have talked to is willing to speak up and stand up for what she believes is right. The harassment women face for speaking up on these issues is beyond vile. There will be few concrete examples of this to offer because this issue is completely disregarded by media, policymakers, and law enforcement. I want you to look at the harassment J.K Rowling has faced for wanting to use sex-appropriate language when speaking of menstruation. Then imagine what the common woman with no financial or political power will have to endure.

Amongst other negative effects of the legislation are that in law and policy language is being made gender-neutral. [These changes](#) were made in the Icelandic legislation last year wherein various law the word woman and mother is erased and substituted with the appropriate body part or bodily function in question.

Elected politicians have started to talk about women's issues in gender-neutral terms. For example in regards to menstruation products, they speak of individuals with uteruses but on men's issues, dehumanizing language is never used. It makes a woman wonder.

One example here: [Ókeypis tíðavörur fyrir öll sem þurfa - Stundin](#)

Again these legislative changes go [against CEDAWs recommendations to Iceland issued 10. March 2016.](#)

The CEDAW Committee is concerned about *"The increasing use of gender-neutral policies in the State party that could unintentionally result in an increase of substantive inequality between women and men."*

And Iceland is recommended to *"Comprehensively address the gender-neutral approach in legislation and policymaking, with an emphasis on the potentially negative implications of gender-neutral policies for public funding programs specifically for women"* (see paragraphs 15. b, 16. b)

When the authorities in Iceland, one of the worlds most gender-equal countries, have abandoned women and girls, their sex-based rights, lived experiences, and concerns and have begun to give courses in how to shut down their voices and gaslight their feelings, push their boundaries and violate their integrity then what comes next? I can just imagine what will happen in near future in prisons, sports, politics, rape crisis centers, women's shelters, in female-only hospital wards, and all other instances women need and should continue to have sex-based rights and safe and fit to purpose female-only spaces. Examples from abroad paint a dark picture, women and girls come second in all instances!

I urge the UN Commission on the Status of Women to seriously consider my concerns as they are an example of grave backlash facing women's rights in Iceland.

Sincerely

An Icelandic woman