World Health Organisation WHO GRE-DEI, HHS, SRH TGDGL@who.int

July 5th, 2024

PUBLIC CONSULTATION ON WHO'S GUIDELINE ON "THE HEALTH OF TRANS AND GENDER DIVERSE PEOPLE"

Dear WHO representatives,

Women's Declaration International (WDI) is a group of thousands of volunteer women from across the globe dedicated to protecting women's sex-based rights.

This is a follow-up to our January contribution to WHO's public consultation.

At the beginning of the year, WHO's announcement drew heavy international criticism, notably for ignoring the point of view of women and girls, lesbians, detransitioners, endorsing the controversial and unscientific concept of "gender identity" and the much disputed "gender affirming care". While WHO has since excluded minors from the Guideline's scope, which WDI applauds, the updated June consultation regrettably demonstrates a failure to address any other concerns seriously.

WHO's announcement remains steeped in language which erases the reality of "sex" and replaces it with the concept of `gender identity`. It assumes that the concept of 'gender identity' is a valid starting point to draft health guidelines, which is incorrect. By adopting ideological language in the text of the announcement itself, WHO demonstrates a clear bias towards the concept of "gender" and 'gender identity` against the reality of sex.

As the battle for Self-ID raged from the parliaments of Scotland and Germany to French and England's elections, from the high-school competitions to the Olympics, from Californian prisons to a German Gym, exposing the danger and affront it poses to females the world over, WHO maintained "Gender Self-Identification" in the scope of its Healthcare Guideline, disregarding basic safeguarding, women's demands and the direct plea from Reem Alsalem, UN Special Rapporteur on Violence against Women and Girls.

As stated in January, WDI is particularly concerned that women and girls, notably lesbians, are specifically affected by the growing trend of "gender-affirming care". The numerous and growing testimonies of detransitioners, most of them female, attest to the devastating consequences of "gender-affirming care" on their psychological, physical, sexual and reproductive health.

Yet, WHO's June announcement doubles down on its endorsement of the ever more contested "gender-affirming care" as an agreed upon and safe medical approach. Indeed, since WHO's initial December announcement, the field of "gender-affirming care" has come under growing scrutiny, following the release of the UK's Cass review, the world's most thorough report ever conducted which starkly concluded there was a lack of scientific evidence and follow-up.

More damning still, the WPATH debacle, started with the release of the WPATH files and WPATH tapes that revealed gross medical misconduct, came to a head last week when subpoenaed documents exposed what amounts to research manipulation and corruption. The court case indicates that WPATH's own guideline, the Standards of Care 8, not only were tampered with by the Biden administration and the AAP, but ignored and suppressed systematic reviews by Johns Hopkins University which concluded for instance on the absence of evidence with regards to 'Gender Affirming Care' for minors. Yet, WHO's updated Guideline Development Group counts no less than 11 WPATH affiliates.

In January, WHO failed to consider the numerous growing controversies surrounding Self-ID, "gender-affirming care" and WPATH. Ignoring them today amounts to gross negligence.

The stakes could not be higher.

We urge WHO to pause this guideline process and rethink its approach.