1. World Bank’s approach of broadening the scope of the outcomes to accelerate gender equality for all is most welcome. Moreover, the strategy considers the varying power structures behind gender inequality. The extension of gender tag/flag from project design in terms of accountability to project implementation with a particular emphasis on gender (equality) outcomes is promising.

2. While the outcomes elaborate on the issues and entry points, it will be helpful to link those more clearly with the findings and lessons learned of the previous strategy and measurable indicators to enable monitoring of the impacts of the Strategy for each gender (equality) outcome.

3. Although the focus of the strategy is on gender equality for all, the emphasis on women, with all the intersectional dimensions, can be made clearer, consistent, and explicit. Women, who are half of the entire population, continue to experience historical and structural discrimination. The current draft strategy acknowledges the impact of multiple and intersecting forms of discrimination. which is commendable but falls short of providing guidance on how to respond to them. More concrete guidance can be added on how to address such forms of discrimination based on gender and other grounds such as age; birth; civil, family or carer status; colour; descent, including caste; disability; economic status; ethnicity; gender expression; gender identity; genetic or other predisposition towards illness; health status; indigenous origin; language; marital status; maternity or paternity status; migrant status; minority status; national origin; nationality; place of residence; political or other opinion, including human rights defender status, trade union membership or political affiliation; pregnancy; property; race; refugee or asylum status; religion or belief; sex and gender; sex characteristics; sexual orientation; social origin; social situation; or any other status.¹ This would be crucial to ensure LNOB.

4. We also welcome the inclusion of persons with diverse sexual orientation, gender identity, expression, sex characteristics (SOGIESC), as they often face marginalization, violence, and discrimination because they are perceived not to comply with gender norms. The strategy needs to address gender-based discrimination against persons with diverse SOGIESC in the assessment and interventions to every group who may be marginalized, migrants, indigenous peoples, older persons, people with disability).

5. WB may wish to consider how to ensure consistency of this Gender Strategy and other policies of the WB. For example, in the context of fiscal and debt constraints, how WB’s funding/lending can avoid austerity measures and other negative impact on gender equality in the recipient countries? How can the WB’s ESF and other operational policies, including those governing development policy lending and program-for-results financing, prevent or mitigate negative impacts on gender equality in WB-supported projects, including but not limited to the prevention, response, and accountability of GBV, sexual exploitation and

---
abuse, and sexual harassment (SEA/SH)?

6. Integrating the engagement with men and boys as a strategy for gender equality is commendable. It is a critical element to achieve gender equality but requires careful approach. To be transformative, engagement with men and boys must challenge patriarchal power relations and structures and be made with full consultation with women’s rights advocates. In the absence of these premises, there is a risk that such initiatives may preserve and reinforce gender inequality and discriminatory gender stereotypes. It would be helpful to also acknowledge how patriarchy negatively impacts men and boys and how they can gain from achieving gender equality. Gender equality should be presented as win-win strategy for all, and not as a competition between winners and losers.

7. The strong focus on “care” is most welcome. However, the suggested approach to “care services” in the Strategy could be better aligned with the recent initiatives on this issue by Member States shifting the framing to “care and support systems” to make the approach more comprehensive and inclusive (GA resolution 77/317 and HRC resolution 54/6). Please see suggested framing in the draft strategy with concrete suggestions.