Dear Ms. Bahous and Mr. Li,

We thank UN Women and the Department of Economic and Social Affairs for their joint report on Progress on the Sustainable Development Goals – the Gender Snapshot 2022. The publication provides important, key information and statistics on the status of achievement of the SDGs with respect to women and girls.

We have the following comments:

1. Nowhere in the report are older women mentioned. We seek confirmation that when “women and girls” are mentioned in the publication, the data, statistics and analysis include women of all ages. If not, we would appreciate receiving an explanation.

2. For SDG3 we have the following comments:
   a. We note that specific reference is made to “women and girls of reproductive age” with respect to restrictions on safe abortion in the context of sexual and reproductive health. We have previously drawn your attention to the continuing absence of reference to sexual and reproductive health and rights as they pertain to older women who experience a range of conditions linked to reproductive health, such as ageing with fistula, cervical, ovarian and breast cancers, menopause, and hormonal changes that contribute to an increased risk of cardiovascular disease, osteoporosis and mental health issues. Women’s health must take a life-course approach. Additional indicators on gender-based health that are inclusive of older women’s reproductive health issues could also promote inclusivity and eliminate the gendered ageism that persists and is now reflected in the Snapshot.
   b. It is not acceptable to hear frequently that data on older women’s health are scarce or insufficient. We formally request that if such scarcity or insufficiency continue to exist, it should be so stated in all future reports on women and girls so that it is clear that there remains one category of women for which data have not been collected nor analysis made. Older women should not continue to be overlooked by UN entities, whether or not data are available.

3. For SDG5, we have the following comments:
   a. Reference is made to violence against women and girls between the ages of 15-49. Please note the removal of the age cap of 49 years of age for the indicators related to target 5.2 to eliminate all forms women and girls subjected to sexual violence against all
women and girls in the public and private spheres, including trafficking and sexual and other types of exploitation (A/RES/71/313).

b. Again, it is not acceptable to hear frequently that data on violence against women beyond reproductive age are scarce or insufficient. Progress has been made in identifying prevalence of violence against older women (VAOW). We now have research that puts prevalence of VAOW internationally at between 14-17%. The WHO, OCSE and the Serbian Red Cross have done this prevalence research (see attached) and more will follow. Data on violence against older women is no longer lacking.

c. We formally request that when it is claimed that scarcity or insufficiency continue to exist, it should be so stated in all future reports on women and girls so that it is clear that there remains one category of women for which more data is a matter of urgency.

4. It is particularly disappointing that UNWomen and UNDESA continue to overlook older women in their statistical analyses, when they should be drawing attention to a significant demographic group. Older women have a right to be included in all aspects, whether or not sufficient data on them are available.

5. According to the DESA World Population Prospects 2022, because of the female advantage in life expectancy, women outnumber men at older ages in almost all populations. Globally, women comprise 55.7 per cent of persons aged 65 or older in 2022. Globally, women comprise 62% percent of persons over the age of 80. How is it possible to address gender equality, combat violence against women and girls, equal pay for equal work, unpaid care work, sexual and reproductive health rights, life-long learning, social protection as well as other factors, without any reference to older women, who have already suffered from a lifetime of discrimination?

6. The NGO Committee on Ageing-New York’s Sub-Committee on Older Women (NGO-COA SCOW) is prepared and open to work with UN Women to rectify the above omissions and bring compliance statistics up to date.

We would appreciate knowing what specific actions you will take to address our concerns.

Yours sincerely,

Cynthia Stuen, Chair, NGO Committee on Ageing-New York (cynthia.stuen@gmail.com)
Kelly Fitzgerald, Chair, NGO Committee on Ageing-Geneva (kellyfitzgerald@outlook.com)
Shantu Watt, Chair, NGO Committee on Ageing-Vienna (ngoageingvienna@outlook.com)

Cc: Stefan Schweinfest, Director, Statistics Division, DESA
    Anita Bhatia, Deputy Executive Director, UN Women
    Aparna Mehrotra, UN Women
    Papa Seck, Chief Statistician, UN Women