To the honorable members of the High-Level Working Group of the Health and Human Rights of Women, Children, and Adolescents

We are sending this letter in response to your invitation to civil society organizations to submit inputs and feedback to the World Health Organization's High-Level Working Group of the Health and Human Rights of Women, Children, and Adolescents. In this letter, we call on you to amend the definition of female circumcision/female genital mutilation (FGM) found on the WHO Arabic website to concord with the definition on the English and French pages.

**English-language definition**:¹

![WHO English definition of FGC](http://www.who.int/topics/female_genital_mutilation/en/)

**French-language definition**:²

![WHO French definition of FGC](http://www.who.int/topics/female_genital_mutilation/fr/)

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¹ Definition of FGC on WHO website in English, http://www.who.int/topics/female_genital_mutilation/en/.
² Definition of FGC on WHO website in French, which matches the English-language definition, http://www.who.int/topics/female_genital_mutilation/fr/.
As is clear above, the Arabic definition is truncated and incomplete. The first paragraph is a translation of only the first sentence of the English definition, while the second sentence in the first paragraph of the English ("It has no health benefits and harms girls and women in many ways") is missing altogether in the Arabic.

The second paragraph of the Arabic diverges entirely from the English and French versions. In the English (and French) versions, the paragraph explains that female circumcision involves the removal of healthy and normal female genital tissue, thus interfering with the natural function of girls’ and women’s bodies. It adds, “The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.” The second paragraph of the Arabic definition addresses none of this. It states instead that female circumcision is typically conducted by midwives although up to 18 percent of all such procedures are conducted by healthcare providers. The Arabic definition makes no mention at all of the fact that the practice has no medical basis.

The EIPR expresses its dismay by the sharp discrepancies in the definitions and the passages that are elided solely in the Arabic definition, especially since the French and English definitions are perfectly consistent.

We wish to inform you that this omission has a severe impact on the health and bodily integrity of women and girls in Egypt. This past September, the Egyptian parliament approved Law 78/2016, which made several amendments to Article 242(bis) of the Penal Code criminalizing female circumcision.

For the first time, the law introduced a definition of female circumcision to the article in question, defining it as the “partial or total removal of the external genitalia or causing injury to the genitalia without medical justification.” This happens to be the exact same truncated definition found on the WHO Arabic page.

The problem is not simply an issue of a missing sentence or paragraph. The article criminalizing female circumcision in Egypt incorporates the phrase “without medical justification,” suggesting wrongly that there may be cases
in which circumcision is medically justified, which is untrue according to definition adopted by the WHO. Worse still, looking at the practice of female circumcision in Egypt, we find that the procedure is now overwhelmingly performed by doctors and health care practitioners. According to the latest Demographic and Health Survey (DHS-2014), 74 percent of all circumcisions of girls under the age of 20 were performed by doctors; the figure increases to 82 percent if we include other health professionals, such as nurses.\footnote{Egypt DHS, 2014, p. 191, \url{http://dhsprogram.com/what-we-do/survey/survey-display-397.cfm}.}

At a time when the Egyptian state should be confronting the medicalization of female circumcision, the flawed definition offers a means and excuse for doctors to evade punishment in the few cases that make it to court, especially given the lack of political will to strengthening Health Ministry oversight and regulation of hospitals and medical clinics to be able to enforce this legal provision..

Preserving the current definition of female circumcision on the WHO Arabic-language website and in the Egyptian Penal Code runs counter to “the global strategy to stop health-care providers from performing female genital mutilation,” released by the WHO in 2010 in concert with several international agencies. It also runs counter to WHO principles, which recognize that medicalizing female circumcision gives some legitimacy to the violation by suggesting to people that the practice may have a justifiable medical basis. The increasing medicalization also promotes the institutionalization of the practice.\footnote{Eliminating Female Genital Mutilation, An Interagency Statement, p. 12, \url{http://www.refworld.org/docid/47c6aa6e2.html}.}

Based on the above, we submit the following proposals:

1. Amend the definition of female circumcision on the WHO Arabic-language website to correspond with the definition in English and French and include the missing passages, and ensure that other translated texts on the WHO website conform to the original language as much as possible and do not undergo fundamental changes during translation.

2. Urge the Egyptian government and parliament to amend Article 242(bis) of the Penal Code by amending the definition of female circumcision in the article to include the sentence, “Female circumcision has no health benefits and harms girls and women in many ways.”

Best regards,

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\small{5 Eliminating Female Genital Mutilation, An Interagency Statement, p. 12, \url{http://www.refworld.org/docid/47c6aa6e2.html}.}