



## Women's Human Rights Campaign

Norris Cochran  
Acting Secretary Department of Health and Human Services  
Hubert H. Humphrey Building  
200 Independence Avenue, SW.  
Washington, DC 20201

March 17, 2021

RE: Executive Order 13988 on Preventing and Combating Discrimination on the Basis of Gender Identity or Sexual Orientation

Dear Acting Secretary Cochran,

As Chair of the Women's Human Rights Campaign USA, I am writing to express my organization's concerns regarding President Biden's Executive Order 13988, 86 C.F.R. 7023 (2021), on Preventing and Combatting Discrimination on the Basis of Gender Identity or Sexual Orientation, and to ask that it be implemented in such a way that does not conflict with the sex-based rights of women and girls. We have not, as a country, taken the time to carefully evaluate exactly what the impact will be on women and girls of defining the word sex to include "gender identity." We must now take the opportunity to have this important conversation.

The Women's Human Rights Campaign (WHRC) is a global nonpartisan group of volunteer women dedicated to protecting women's sex-based rights, and WHRC USA is the U.S. chapter of WHRC. Our volunteers include academics, writers, organizers, activists, lawyers, and health practitioners. The Declaration on Women's Sex-Based Rights was created by the founders of WHRC to lobby nations to maintain language protecting women and girls on the basis of sex rather than 'gender' or 'gender identity.' The Declaration, which has more than 2,000 signatories in the United States and more than 15,000 worldwide, re-affirms women and girls' sex-based rights and challenges the discrimination we experience from the replacement of the category of sex with that of 'gender identity.'

As you conduct your review ordered by President Biden, the US chapter of the Women's Human Rights Campaign (WHRC-USA) requests that you pause any proposed changes to regulations, policies, and guidelines pending a thorough impact assessment. The Department of Human Health Services (DHHS) is responsible for protecting the health of all Americans. But how does this Executive Order affect the citizens of this country?

Sex is defined as either of the two main categories--male and female—into which humans and most other living things are categorized on the basis of their reproductive functions. “Gender identity” is an individual, subjective feeling about oneself. It has no basis in material reality and is not scientifically quantifiable. Yet there is an alarming exponential rise in the number of youths visiting gender clinics, of which there are fifty-three known facilities in the United States. If clinics are following the WPATH guidelines, a patient only needs “informed consent” instead of a physician’s note to access hormones. Therapy sessions are not required. Is an underage child capable of “informed consent” in taking off-label drugs and/or the removal of healthy body parts?

The Gender Management Service, which is part of the Boston Children’s Hospital, has served patients as young as three years old. In the United Kingdom’s *Keira Bell vs Tavistock* case, the court determined that anyone under the age of sixteen years cannot give informed consent about puberty blockers or hormones. On January 23<sup>rd</sup>, 2021 Dr. David Bell commented on the Tavistock clinic and stated that “35-40% of these children are on the autistic spectrum, a large number of them have been exposed to major trauma, a large number have very serious family problems, and a particularly large number of them, young girls, who if left alone could be helped to become non-gender conforming lesbians... this is a form of conversion therapy.” The Women’s Human Rights Campaign (WHRC) asks that the DHHS run a risk assessment on how this will impact children who are assisted by its child welfare programs.

WHRC USA appreciates the opportunity to share with you our concerns, and I would be happy to answer any questions you might have about the necessity of protecting the sex-based rights of women and girls. Please contact me at [info@womensdeclaration-usa.com](mailto:info@womensdeclaration-usa.com) if I can be of further assistance.

To learn more about our organization, visit [www.womensdeclaration.com](http://www.womensdeclaration.com)

Best regards,



Women’s Human Rights Campaign USA

WHRC-USA is the US chapter of an international organization dedicated to protecting women’s sex-based rights. Our founding document, the *Declaration on Women’s Sex-Based Rights*, re-affirms women and girls’ sex-based rights as enumerated in the 1979 Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) and subsequent international agreements, and challenges the discrimination we experience from the replacement of the category of sex with that of ‘gender identity’. The *Declaration* is a clear call to law and policy makers to retain the sex-based biological definition of woman. WHRC is a nonpartisan organization.