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<CN>3.<EM><CT>Tensions in rights: navigating emerging contradictions in the LGBT rights revolution[1]

<AU>Philip M. Ayoub

Few revolutions in rights have emerged as suddenly, and with such intensity, as the sweeping changes we have observed around LGBT[2] rights in the last two decades. In many states, these monumental changes have transformed many LGBT people from the proverbial "other" – often perceived as criminal and degenerate – into respected and sometimes even celebrated members of society. Coming out of the depths of the AIDS crisis of the 1980s, few would have predicted the major victories in rights many states afford LGBT people in 2018. From the passage of gender recognition in Colombia and Malta to same-sex marriage in Ireland and South Africa, the diversity of states that address such norms have surprised even the most pessimistic onlooker. As such, LGBT rights constitute an intriguing example of unexpected and transformative social change on a global scale.

Yet, these successes have not gone unchallenged. In line with the impetus for this volume, LGBT human rights stand at particularly crucial crossroads in contemporary world politics: both expanding and contracting, deepening and collapsing. With the rejection of claims made by LGBT movements in many states, and amidst a global politics marred by exclusionary populism and nationalism, LGBT rights are increasingly contradicted on the world stage. Such contradictory claims are both more refined and disseminated in global politics – often in very similar ways – by powerful actors (including states and INGOs) operating in transnational politics. For example, the promotion of family values/traditional values and religious liberty dominate contemporary global discourse. From Russian President Vladimir Putin's commitment to defend states from a "Gay-European" threat to the campaign opposing the Colombian FARC peace accord on the basis of its "gender ideology" – LGBT advocates operate in an increasingly polarized world. It is a world defined by serious contradictions in the interpretations of the very rights that have in recent decades recognized the human dignity of LGBT people in many corners of the globe.

This chapter explores the tensions between the transnational diffusion of LGBT rights and a "traditional values"-politik championed by an emerging global opposition, as well as the instrumental reframing and translation of "traditional values" and "family values" norms by LGBT activists as a direct response. In doing so, the chapter looks at pathways of influence for LGBT movements in a world riddled with new types of global contradictions. It addresses two core questions that guide the volume. First, on the global contradiction in rights: *Where do we see contradictions in the logics or*

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[1] This work has heavily drawn upon material from: Ayoub, P. "Protean Power in Movement: Navigating Uncertainty in the LGBT Rights Revolution," in P. Katzenstein and L. Seybert (eds), *Protean Power: Exploring the Uncertain and Unexpected in World Politics* (Cambridge Studies in International Relations, pp. 79–99), 2018 ©, published by Cambridge University Press, reproduced with permission. The research for this chapter was supported by the Postsecular Conflicts Project (European Research Council Grant STG-2015-676804).

[2] LGBT is an umbrella term referring to lesbian, gay, bisexual, and trans people. I use the umbrella term while acknowledging that the issues of bisexual and trans people have been excluded throughout much of the history of the gay and lesbian rights movement.

impact of the human rights regime in NGO campaigns? And second, on the circulation of human rights: *What do we know about diffusion, translation, and grassroots localization as possible pathways of rights, in light of clashes between contradictory understandings of rights at the global level?*

Using the case of the European Union (EU), I address these questions by looking at the contradictions that emerge in response to the hard law conditionality often associated with the successful transfer and diffusion of rights. While LGBT advocates do rely on the now dominant systems of knowledge that have legitimated their rights in the European polity, these universal conceptions of sexuality as human rights are commonly challenged within domestic European contexts. Actors reframe these rights to associate threat with LGBT people, arguing that their visibility challenges the coherence of national identity. The majority is thus painted as needing protection from the rights of LGBT people: the "right" to defend the imagined traditional values associated with the family, the nation, and with religious practice. Such imagined contradictions create challenges for LGBT activists as opponents paint LGBT rights as antithetical and contradictory to national self-understandings, as well as a host of other rights societies have come to accept. For example, the traditional family and rights of the child are painted as incongruous with LGBT rights. I will emphasize here that when I refer to rights contradictions they are often imagined and/or socially constructed contradictions, which is why I refer to them with these adjectives. The irony, of course, is that many LGBT people do have families, do practice religions, and do reproduce national traditions.

This chapter analyzes how LGBT rights advocacy, within distinct contexts, innovatively addresses these imagined contradictions in rights. It is this process that comes into play when contested rights clash with the arguments of rival movements and globally disseminating counter norms. Faced with competing claims about new norms governing sexuality – especially those that problematically conflate sexual rights with the external imposition of "Western" power over the "vulnerable" states – local LGBT activists respond with the practice of translation. Translation is particularly important for contexts in which LGBT people have been isolated from the public sphere: as an unknown actor that, when initially visible, can provoke backlash. It is an interactive top-down and bottom-up process in which actors present and package dominant conceptions of sexual rights for distinct audiences.

In making this argument, I show that the standard rights-diffusion model has diminished much of the translation work that actors *on the ground* rely upon. These actors are attentive to the realities that remain invisible from the top down—realities that reveal the often dark effects of imagined contradictions on the lived experiences of marginalized groups that truly depend on rights recognition. The products of this translational work are new pathways for influence and sometimes transformative change. It explains, for example, why the Irish "*Yes Campaign*" branded itself as a "children's rights" campaign, or why the Polish *Campaign Against Homophobia* now embraces frames that link to Catholicism.

In what follows, I introduce the European LGBT rights regime in Part 1; use that empirical case to discuss emerging contradictions in LGBT rights in the region in Part 2; then, in Part 3, I look at processes of translation that activists use in carving out new pathways of influence to cope with such contradictions; before concluding in Part 4.

<A>PART 1: EUROPEAN LGBT RIGHTS REGIME

It was after the Second World War, as part of a post-1945 rights revolution, that sexual minority rights first evolved on the periphery of the broader human rights regime, eventually attaining high political salience across many parts of the world in recent years. Reacting to unresponsive states that had long prohibited access to sexual minorities, LGBT actors in Europe sought out new sources of

power outside of the state. Because sexual minorities existed in some form across societies, cross-border ties became of paramount importance to political action for post-war *Homophile* and post-Stonewall (1969) *Gay Liberation* activism. Recognizing that several elements of their situations were shared across borders, many activists found unlikely transformative power by organizing transnationally. In 1978, an enduring transnational constellation emerged as the result of a nationally diverse activist meeting in Coventry, United Kingdom: the International Lesbian, Gay, Bisexual, Trans and Intersex Association (ILGA) (Paternotte 2012). Due to uneven support among their respective states, ILGA activists – and a handful of pioneering states that supported their cause – began targeting European institutions as a venue to challenge the state powers that had previously closed the door to them. These activists were innovative, if not visionary, because they targeted an international organization (the European Community) more than a decade *before* it had the social mandate it would attain after the Maastricht Treaty of 1992 (Ayoub and Paternotte 2014). At the time, the odds of finding institutional allies from an economically focused international organization on this contentious issue were remarkably low.

Targeting the EU – and other international organizations, such as the Council of Europe (CoE) and the Organization for Security and Cooperation in Europe – did create a place for rights on the basis of sexual orientation and gender identity at the periphery of the broader human rights regime. Over time, the articulations of a norm that LGBT people are entitled to fundamental human rights, deserving of state recognition and protection, became increasingly clear in both the rhetoric and the legal framework of EU and CoE institutions (Beger 2004). Article 13 of the 1997 Amsterdam Treaty introduced the first internationally binding law on the issue – it prohibited employment discrimination on the basis of sexual orientation. The 2000 Employment Anti-Discrimination Directive; the European Charter for Fundamental Rights; the 1993 Copenhagen Criteria; various European Parliament resolutions (e.g. European Parliament Resolution on Homophobia in Europe 2005/2666); European Court of Human Rights decisions (e.g. Bączkowski and others v. Poland, 1543/06); and European Court of Justice decisions (e.g. C-13/94, P. v. S. and Cornwall County Council) further institutionalized the norm as part of European human rights values (Swiebel 2009; Wilson 2013; Kollman 2009). In more recent years, and especially for post-communist states that wish(ed) to join the EU and CoE, the "return to Europe" would mean adopting the universal understandings of the LGBT norm that European institutions now proffered.

<A>PART 2: SUCCESSES AND THE CONSTRUCTION OF CONTRADICTIONS IN RIGHTS

While advocates rely on these now dominant systems of knowledge that have legitimated LGBT rights norms in the European polity – especially in unresponsive states – the "one-size-fits-all" interpretations of such rights have produced varied and unpredictable outcomes across states. On the one hand, the EU has used incentives, such as membership or enhanced political ties, to produce desirable rights outcomes in a calculable fashion. Indeed, such carrot/stick power has produced compliance outcomes: notably the introduction of employment anti-discrimination measures, which now exist across the 28-state polity. The CoE, which has also played an activist role promoting the norm, has produced major court rulings in defense of LGBT people across its 47 member states. However, the diffusion of LGBT rights models was met with considerable resistance as they were diffused across the CoE, the EU, and their neighborhoods. Importantly, dominant conceptions of sexuality as human rights also resulted in the inflation of threat perception in multiple domestic contexts. Often portrayed as external imposition of foreign power over the "vulnerable" domestic spheres, emerging counter-movements problematically conflated LGBT rights with "secular" or "Western" imposition (as with other types of human rights, Kymlicka and Opalski 2002).

Hard law conditionality around sexual minority rights thus came with sudden shocks that could backslide the early successes of LGBT movements by mobilizing new societal actors to challenge them. When such measures were introduced, many new member states responded by simultaneously banning public assembly and even proposing homophobic bills, such as ones that proposed to remove LGBT people from teaching in schools and constitutional bans on same-sex unions – often justified out of concern for children (Biedroń and Abramowicz 2007). State authorities did this both to reap political gains from uncertainty in civil society – and with the intention to further enhance it by questioning the validity of the right. For example, as a direct response to a European Court of Human Rights ruling against Russia, Moscow took the opposite position and banned public assembly by LGBT people for 100 years. States have also introduced novel bills intended to protect religious liberty, sanctify marriage, oppose "gender ideology," and ban the promotion of homosexuality. Such resistance by governments creates an indeterminacy surrounding the legitimacy of new LGBT rights norms that also fuels the fomentation of societal backlash. In response, at the societal level, rates of violence against LGBT people in other spheres of life often accelerated, and popular attitudes toward LGBT people often declined. Within the EU, the mean country scores measuring the approval of homosexuality dropped in the Czech Republic, Estonia, Slovakia, and Slovenia in the European Values Survey waves before and after EU accession ("European Values Study 1981–2008" 2011).

Transnational networks of opposition actors have helped to construct contradictions in global gender regimes that fuel backlashes against LGBT people and women in multiple locales. One such example is the role of the Roman Catholic Church in its struggle against the proliferation of so-called "gender ideology." Seeing United Nations (UN) conferences in Cairo (1994 International Conference on Population and Development) and Beijing (1995 World Conference on Women) as a defeat to their positions around sexual and reproductive rights, the Church sought to organize against such rights, fearing that these rights could open the door to "the international recognition of abortion, attacks on traditional motherhood and a legitimization of homosexuality" (Kuhar and Paternotte 2017, p. 9). According to Roman Kuhar and David Paternotte, those fears were encapsulated by the new concept of gender ideology, a term

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created to oppose women's and LGBT rights activism as well as the scholarship deconstructing essentialist and naturalistic assumptions about gender and sexuality … it regards gender as the ideological matrix of a set of abhorred ethical and social reforms, namely sexual and reproductive rights, same-sex marriage and adoption, new reproductive technologies, sex education, gender mainstreaming, protection against gender violence and others. (Kuhar and Paternotte 2017, p. 5)

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In this narrative, gender ideology is the central threat to the reproduction of *man*kind and societies in general the world over. Gender ideology is commonly attributed to international LGBT rights advocates, whose work is reframed in creative ways, for example "as a neocolonial project through which activists and their governments try to export their decadent values and secularize non-Western societies" (Kuhar and Paternotte 2017, p. 8).[3] It has been successful at mobilizing opposition campaigns to LGBT rights in many countries, for example the French *La Manif pour tous* or the Colombian opposition to the FARC peace deal, and paints LGBT rights as antithetical to "traditional values" – whatever those happen to denote in any given time and place.

Identifying stagnant rights is thus challenging when we consider the diverse realm of contending actors at play in LGBT politics as well as the global polarization of the norm. Just as US state power has been a force for some LGBT people in recent years, an array of US non-state actors are responsible for introducing anti-gay bills to various regions in the first place (e.g. anti-

[3] Paradoxically, colonial-Britain introduced anti-sodomy laws to many parts of the world where this discourse is now used (Weiss and Bosia 2013).

gay activist Scott Lively's involvement in early iterations of the notorious Ugandan "kill the gays" bill) (Bob 2012; Weiss and Bosia 2013).

The anti-LGBT politics of the Orthodox Church (Stoeckl 2016) and Vladimir Putin's Russia (Stoeckl and Medvedeva 2017), a member of the CoE, is equally exemplary of the construction of contradictions in LGBT rights norms. Since about 2009, the state has used the rhetoric of "traditional values" to present Russia as the international protectorate of the new post-secular morality politics, justifying the passage and diffusion of anti-"homopropaganda" laws that center on sexual "decadency" as deviant (Wilkinson 2014). This politics of traditional values has been used as a geopolitical tool with which to distance Russia from Western power. This explains why, as Ian Bateson (2016) has described, the Ukrainian "pro-Kremlin media was attempting to portray the pro-EU [Maidan] protests two years ago as a tantrum by LGBT people yearning to join 'Gayropa'." Often placing LGBT politics and the people they represent squarely in the middle of heated geopolitical contests, "the traditionalist agenda spearheaded by Russia since 2009 innovates non-liberal views on human rights … [transforms them into a] 'universalism' of its own kind, directly in contrast with the individualistic egalitarian universalism of the liberal view on human rights" (Stoeckl and Medvedeva 2017, p. 9). It is this attractive appeal to various actors, including in the West, that has polarized the field of human rights, as well as politics among the UN members (Stoeckl and Medvedeva 2017, p. 9). Russia's new paradigm of moral conservatism has (re)introduced contestation around LGBT rights at the international level. Instead of an increasingly strengthened international norm, the rights movement is faced with international norm polarization (Wilkinson and Langlois 2014). This involves one community of states refusing the values deemed to be of another, making LGBT rights part of a geopolitics in which states coopt the values that align with "their" side.

In the EU's neighborhood, Ukraine is an instructive example of this rights contradictions paradox, in which the power of strict conditionality around LGBT human rights was met with a mixed response of acquiescence and resistance. In exchange for liberalized travel visas, Ukraine was compelled to adopt employment anti-discrimination measures with protections on the basis of sexual orientation. Yet such minimal compliance does not equate with the norm internalization goals set by the LGBT movement. After two failed attempts to pass such a bill in early November 2015, Ukrainian parliamentarians were obliged to make the third time "the charm"; begrudgingly they introduced the bill after immense pressure from state leaders and EU officials. Yet passing the bill came with simultaneous heightened resistance. Political leadership across parties assured their citizens that Ukraine would not introduce any other rights for such minorities, and that tolerance toward LGBT people would not be internalized as part of Ukrainian national values. President Petro Porochenko declared that "family values will remain inviolable," and the "speaker of parliament assured deputies that the law would not threaten 'family values', saying: 'I hear some fake information which says that there may be same-sex marriages in Ukraine. God forbid, this will ever happen. We will never support this'" (BBC News 2015). State authorities have banned LGBT marches and festivals ever since the introduction of the norm (Bateson 2016). In 2016, a march in Lviv was canceled after the state said it could not be protected, prompting activists to flee the city after right-wing groups attended the planned meeting shouting "kill, kill, kill" (BBC News 2015). Societal backlash also ensued, including an arson attack on a cinema during a screening of a gay-themed film in October 2014 as well as targeted attacks on activists (Kenarov 2015). Amid safety concerns spurred by increased repression, Ukrainian LGBT activists opted to protest outside Parliament without the symbolic rainbow flag, a 1970s innovation of the American Gay Liberation movement that became a global symbol of tolerance for LGBT people. Indeed, this refusal of typical LGBT symbols – largely because they buttressed the Russian Duma's claims that pro-EU Maidan protestors were all "gay degenerates" – was so evident that an LGBT organization attributed a flash mob of protestors using the rainbow flag as

a provocation organized by pro-Russian groups and the Ukrainian Security Service (Kenarov 2015).

Thus, while EU law – and the UN's more recent rhetoric and declarations (e.g. Hillary Clinton's 2011 speech in Geneva, Clinton 2011) – might lead us to take for granted that systems of knowledge place LGBT people squarely within universal human rights, this knowledge system does not go uncontested. Contentious debates destabilize new international narratives at local levels, and they can undermine the efficacy of such institutions to engineer change from above. Indeed, there is a multiplicity of centers of control from which such power can be exercised that make norms indeterminate. As the new Russian paradigm of "traditional values" politics exemplifies, refusal as a response to power also leads to what Symons and Altman call "norm polarization" (Symons and Altman 2015). Such polarization refers to a process in which states purposively take contradictory positions on the same norm, leading to norm indeterminacy at the global level. This heightens uncertainty for LGBT advocates in states not firmly embedded in the trans-Atlantic community of states. It is not surprising, thence, that when the American President Barack Obama threatened the material consequences of cutting aid to Uganda for passing an anti-homosexuality bill, Ugandan President Yoweri Museveni replied he will then "want to work with Russia" (Ssebuyira and Kasasira 2014).

It is thus worth emphasizing that responses to the diffusion of LGBT rights norms are rarely singular or calculable. Actors on both the international and domestic levels provide competing views of, and solutions to, the issue of LGBT rights that LGBT people on the ground must navigate. When LGBT rights first appear in popular discourse, they almost always provoke resistance. As the next subsection demonstrates, translation operates as a pathway for influence in the periods of contestation I have outlined above.

<A>PART 3: RIGHTS RESILIENCE: NEW PATHWAYS FOR NAVIGATING IMAGINED CONTRADICTIONS

Faced with competing claims about new norms, local LGBT activists respond with a process of *translation*, adapting universal norms to local contexts, and *innovation*, when no functioning models exist. This is especially crucial for audiences in which LGBT people have been previously isolated from the public sphere. In these common scenarios, uncertainty operates, emerging from contradictions in norms and right. Local advocates face the conundrum of what to do given resistance and backlash on the ground, painfully aware of both the expectations of prior legitimate rights models as well as their unanticipated consequences that they must now confront. They also must deal with the deep norm-indeterminacy surrounding rights at the domestic and international levels: domestic indeterminacy in response to "imposed" and illegitimate norms that clash with local sovereignty as well as international indeterminacy involving norm polarization. Such contradictions can question the very existence of LGBT people and their rights; it is especially operative when LGBT individuals first step into the light of local public visibility. Local LGBT activists then focus on addressing the indeterminacies surrounding rights to root their claim's legitimacy.

During these periods of uncertainty, when political opposition intensifies, local LGBT advocates turn to translation and innovation to adapt to changing environments. In doing so, they help to interpret norms and create knowledge concerning the societal place of the group they represent. During operational uncertainty, this can mean that actors both dismantle and adapt common attributes of the universal norm, using their local knowledge to *translate* the norm in unique social and cultural terms (Seckinelgin 2009). Such translation comes into play when universal scripts clash with local ones. It is especially necessary in the case of LGBT rights, since majority populations often turn to traditional social conventions – ones that rarely provide positive etymologies of LGBT people – when "external" LGBT norms are made visible.

Advocates can balance engaging in translation while maintaining relations with outside actors (including other states and EU institutions) who provide valuable resources and support. Thus they creatively find spaces to exploit when contesters of rights begin to construct contradictions.

An example of this process is the Polish LGBT movement's consistent translation as it navigates among various competing groups in periods of intense backlash. Provoked by the perceived imposition of new EU standards, Polish counter-movements framed sexual rights as "external" and incongruent with Polish national identity. During an intense period of politicized homophobia following EU accession, from 2004 to 2007, local LGBT actors worked to reconcile authoritative international demands and create appropriate local meanings for norms. This process is highly improvisational, shaping new understandings of LGBT minorities in the domestic sphere by moving them from the external periphery to connect them to domestic political debates. At the core of this process has been repackaging "LGBT rights" according to different contexts and forms of emerging opposition. The innovative nature of these movement actors is captured in the practice of translation. It describes how advocates reconcile external and internal contradictions in rights, constantly reshaping how their rights are presented and packaged (this concept is directly related to vernacularization [Merry 2006] and reframing [Brysk 2018], both of which describe similar dynamics).

Polish activists have long engaged in a process of translation that connects the universal LGBT norms championed by EU institutions to their local audiences. Leading up to Poland's EU accession, activists framed the issue as one of European values and responsibilities associated with democratization. When public assembly was banned in 2004 and 2005, activists used their transnational networks to mobilize European dignitaries to march in Poland (Ayoub 2015). During periods of Euro-optimism, the LGBT frame was primarily attached to the EU. Protestors donned t-shirts that stated "Europa=Tolerancja" and waved EU flags. Foreign dignitaries were told to refer to themselves as Europeans, which resonated with the wider political discourse of Poland's "return to Europe" (Havel 1990).

In a later post-accession period, when the anti-EU politics intensified, activists shifted gears. By emphasizing that LGBT people were precisely the aspect of "Europe" that was to be rejected, the emerging opposition surprisingly changed the focus of the LGBT movement to the nation. While the Polish cultural counter-movement is a loose conglomeration of religious, political, and nationalist actors, their frames converged around an issue of the nation being "under attack" by external forces – largely in a differentiated response to the international human rights frames touted by the LGBT movement initially.[4] As Agnès Chetaille and I have traced across 23 years of Polish activism, the movement responded to its opposition strategically by emphasizing its Polishness in frames that signal a far more rooted politics of sexuality than before (Ayoub and Chetaille 2018; see also Chetaille 2015). They used "Catholic" and (increasingly) "national" frames to root LGBT rights as Polish. For example, Poland's largest LGBT organization, the transnationally-linked *Campaign Against Homophobia*, changed its logo to mimic the national borders of Poland. In 2016, the organization co-developed a campaign called *Przekażmy Sobie Znak Pokoju* (Let us offer each other a sign of peace).[5] It adapted the locally resonate phrase – used at mass and also by Polish bishops in a reconciliatory letter to German bishops in 1965 – placing it over a picture of two hands shaking, one hand adorned with a rosary and the other with a rainbow flag bracelet. The campaign, displayed on billboards across the country, generated a firestorm of media attention around the "radical idea" of compatibility between religious values and LGBT rights. Early signs seem to suggest a historic step forward in soothing the oil and water relationship between Catholicism and LGBT rights in Poland.

These tactics were contentious within and outside the Polish movement, as activists remain hesitant to wash away the decades of harm they have experienced resulting from the

[4] While I focus on Poland in this example, scholars have charted similar counter-movement frames of "threat to nation" across new-adopter states in Europe (Swimelar 2016; Mole 2016; Ayoub 2014).
[5] http://www.znakpokoju.com/.

Church's vehement opposition. The tactic would also appear ill-conceived to some of the best practice handbooks and directives, emphasizing universality, composed by LGBT lobbyists and policymakers in Brussels (and in Amsterdam, Stockholm, and Berlin). But Polish actors do so in an innovative way that has countered and coopted the arguments of the resistances that emerged in response to imported and sometimes coercive models of external LGBT activism.[6] At the INGO ILGA-Europe's 2016 summit, the early success of the controversial Polish campaign turned heads, with new calls emerging to replicate it in other domestic contexts. It is thus also an example of the power of translation in human rights advocacy, as it aids in constituting and reconstituting human rights norms.

As Table 3.1 illustrates, activists were consistently improvisational in how they presented LGBT rights according to the changing context.[7] Throughout this process, local actors borrow models that fit (e.g. human rights, democracy, European values) as well as altering and adapting them in an agile process of translation. This is done as they navigate what comes their way in a constantly changing environment of contestation. In the Polish case, frames have become increasingly rooted in response to nationalist local challenges. For the Polish activists, translation becomes an interactive top-down and bottom-up process in which actors present and package dominant ideas and master frames of sexual rights for distinct audiences.

Table 3.1 Innovative framing by the Polish lesbian and gay movement, 1987–2010

	1987–2001	**2001–2004**	**2004–2005**	**2005–2010**
I. Changing Period of Uncertainty	Democratic Transition and the "Return to Europe"	Political Allies and European Accession	New Adversaries/ Opposition Intensifies	Movement Counter-Movement Interaction
II. Innovative Frame Attributes	External and Universal	External and Non-Contentious	Contentious and Diversified	Diversified, Rooted, and Particular
III. Types of Frames Used	*Human Rights*: universal principles of equality and rights; *Democracy*: return to normality, democracy	*Educational*: anti-discrimination, anti-homophobia, "get to know us"; *Europeanization*: European values/ responsibilities	*Defining Adversaries*: political parties, nationalist organizations, "saving democracy"	*Reclaiming Localness*: patriots versus nationalists; *National Turn*: religion, culture, and memory; "love thy neighbor," "Catholics we love you," "forgiveness," "Solidarność"

Source: Table derived from Ayoub and Chetaille (2018).

[6] Similarly, local Ugandan and Russian LGBT activists opposed the well-intended external activist calls for boycotts (of Western aid to Uganda, and calls for participation boycotts to Russia's Sochi Olympics) in response to state homophobia.

[7] Insights for Table 3.1 are derived from Ayoub and Chetaille's (2018) process-tracing work on the Polish movement's framing strategies.

While this example has drawn on Poland, LGBT activists throughout the world respond to ever-changing contexts of uncertainty. Even in the aforementioned Ukrainian case, activists today are debating and adapting the initial strategies they deployed two years prior (Bateson 2016). The same dynamic of translation is true of countries with older LGBT movements. Kelly Kollman has shown, for example, how the LGBT norm, which is often presented in the language of "European values" in the EU, has been reframed according to specific domestic contexts. British activists abandoned the frame entirely, framing it in national terms. German activists held on to the resonant frame, shaming Germany for "falling behind" European human rights standards. Dutch activists argued that LGBT rights were a forum for the Netherlands to play a norm-pioneer role in European and world politics (Kollman 2014). In other mainly non-European contexts, activists have rejected the terms "queer," "gay," and "lesbian" rights entirely for their specific constituency. In the hopes of removing their "foreignness" or strengthen their inclusivity, they prefer local language variants or other terms like "men who have sex with men" (MSM) or "sexual orientation and gender identity" (SOGI).

In sum, contradictions produced by the clash or misfit between international human rights norms with domestic values and global counter-movements have generated impulses for local LGBT activists who find new pathways to translate rights into different national contexts. Faced with emerging counter-movements and competing claims about new norms governing sexuality, local advocates, embedded in transnational networks, developed tools of norm translation to navigate this complex terrain. In the last decades, they engaged supranational institutions when their respective states closed access to them. And later, after successfully securing international support, they translated and localized the norm as it reentered the domestic sphere. In times of uncertainty around rights, they looked for new allies and sought to reframe the norm in a discourse that resonated with local audiences and disempowered the frames used by their opposition.

<A>PART 4: CONCLUSION

This chapter has explored the imagined contradictions in rights surrounding LGBT people, as well as the new pathways advocacy networks have generated to address them. The sweeping global changes surrounding the adoption of norms governing LGBT rights has come hand-in-hand with the articulation of contradictions by the resistances to them. While backlash to LGBT rights itself is common, and thus anticipated by LGBT movement actors, the various shapes it takes are not.

The institutionalization of LGBT rights has shown recurrent and divergent understandings, and constructed contradictions of human rights at international and domestic levels. This has created opportunities for innovative political mobilization and the creative translation and grafting of new rights onto local contexts (Price 1998), and a type of power embodied in the innovative and improvisational practices that have always been paramount to LGBT advocacy. When international institutions and INGOs introduced new international standards of human rights that provoked backlash, activists creatively reframed them, often rooting them locally with frames that had previously been seen as antithetical to LGBT rights norm promotion. Depending on the time, period, and context, different frames helped facilitate translation to the national level. This was evident in the Polish case, in which activists rooted the universal human rights claims by linking them to the frames used by their opposition. While the empirics surrounding LGBT rights advocacy drew heavily from the broader European context in this chapter, we observe a related dynamic of contestation and contradictions in rights in other world regions. For example, as Ashley Currier has demonstrated, the universal underpinnings of LGBT rights norms have also clashed in Namibia and South Africa, where they have been portrayed as colonial and un-African (Currier 2012).

Across the globe, LGBT rights activists resist state and societal repression, finding new pathways to, more or less successfully, transform the state's conception of human rights. Often their innovative practices also loop back to influence the strategies of international institutions and INGOs that work to cement understandings and reconcile new contradictions in rights. The case of LGBT rights in Europe illuminates this ongoing process, demonstrating how advocates navigate contradictions in rights across international and local arenas, and translating universal rights to fit their local realities. It is a process of both great struggle and astonishing resilience.

<A>REFERENCES

Ayoub, Phillip M. 2014. "With Arms Wide Shut: Threat Perception, Norm Reception, and Mobilized Resistance to LGBT Rights." *Journal of Human Rights* 13 (3): 337–62.

Ayoub, Phillip M. 2015. "Contested Norms in New-Adopter States: International Determinants of LGBT Rights Legislation." *European Journal of International Relations* 21 (2): 293–322.

Ayoub, Phillip M., and Agnes Chetaille. 2018. "Movement/Countermovement Interaction and Instrumental Framing in a Multi-Level World: Rooting Polish Lesbian and Gay Activism." *Social Movement Studies* 17 (1), online first, https://doi.org/10.1080/14742837.2017.1338941.

Ayoub, Phillip M., and David Paternotte. 2014. "Challenging Borders, Imagining Europe: Transnational LGBT Activism in a New Europe." In *Border Politics, Social Movements and Globalization*, edited by Jennifer Bickham-Mendez and Nancy Naples, 230–60. New York: NYU Press.

Bateson, Ian. 2016. "The 'New Ukraine' Is Failing Us, LGBT Activists Say." *The Guardian*, March 31, 2016, sec. World news. https://www.theguardian.com/world/2016/mar/31/new-ukraine-government-lgbt-activists-gay-rights-zoryan-kis (accessed July 31, 2018).

BBC News. 2015. "Ukraine Passes Anti-Discrimination Law," November 12, 2015. http://www.bbc.com/news/world-europe-34796835 (accessed July 31, 2018).

Beger, Nico J. 2004. *Tensions in the Struggle for Sexual Minority Rights in Europe: Que(e)rying Political Practices*. Reprint. Manchester: Manchester University Press.

Biedroń, Robert, and Marta Abramowicz. 2007. "The Polish Educational System and the Promotion of Homophobia." In *The Situation of Bisexual and Homosexual Persons in Poland 2005 and 2006 Report*, edited by Marta Abramowicz, 51–5. Warsaw: Campaign Against Homophobia and Lambda Warsaw Association.

Bob, Clifford. 2012. *The Global Right Wing and the Clash of World Politics*. Cambridge: Cambridge University Press.

Brysk, Alison. 2018. *The Struggle for Freedom from Fear: Contesting Violence against Women at the Frontiers of Globalization*. Oxford, New York: Oxford University Press.

Chetaille, Agnès. 2015. *Les Paradoxes D'une Histoire sans Transition: Entre l'Ouest et La Nation, Les Mobilisations Gaies et Lesbiennes En Pologne (1980–2010)*. Paris: EHESS. http://www.theses.fr/2015EHES0144.

Clinton, Hillary. 2011. "Hillary Clinton On Gay Rights Abroad: Secretary Of State Delivers Historic LGBT Speech In Geneva." *Huffington Post*, December 6, 2011, sec. Queer Voices. http://www.huffingtonpost.com/2011/12/06/hillary-clinton-gay-rights-speech-geneva_n_1132392.html (accessed July 31, 2018).

Currier, Ashley. 2012. *Out in Africa: LGBT Organizing in Namibia and South Africa*. Minneapolis: University of Minnesota Press.

"European Values Study 1981–2008." 2011. http://www.europeanvaluesstudy.eu (accessed July 31, 2018).

Havel, Václav. 1990. "Speech by Václav Havel, President of Czechoslovakia – The Polish Sejm and Senate." January 25, 1990. http://old.hrad.cz/president/Havel/speeches/1990/2501_uk.html (accessed July 31, 2018).

Kenarov, Dimiter. 2015. "Dashed Hopes in Gay Ukraine." *Foreign Policy*, January 19, 2015. http://foreignpolicy.com/2015/01/19/dashed-hopes-in-gay-ukraine-maidan-russia/ (accessed July 31, 2018).

Kollman, Kelly. 2009. "European Institutions, Transnational Networks and National Same-Sex Unions Policy: When Soft Law Hits Harder." *Contemporary Politics* 15 (1): 37–53.

Kollman, Kelly. 2014. "Deploying Europe: The Creation of Discursive Imperatives for Same-Sex Unions." In *LGBT Activism and the Making of Europe: A Rainbow Europe*, edited by Phillip M. Ayoub and David Paternotte, 97–118. Basingstoke, UK: Palgrave Macmillan.

Kuhar, Roman, and David Paternotte, eds. 2017. *Anti-Gender Campaigns in Europe: Mobilizing against Equality*. London ; New York: Rowman & Littlefield International.

Kymlicka, Will, and Magda Opalski. 2002. *Can Liberal Pluralism Be Exported?: Western Political Theory and Ethnic Relations in Eastern Europe*. Oxford: Oxford University Press.

Merry, Sally Engle. 2006. *Human Rights and Gender Violence*. Chicago, IL: University of Chicago Press.

Mole, Richard. 2016. "Nationalism and Homophobia in Central and Eastern Europe." In *The EU Enlargement and Gay Politics*, edited by Koen Slootmaeckers, Heleen Touquet, and Peter Vermeersch, 99–122. Basingstoke, UK: Palgrave Macmillan.

Paternotte, David. 2012. "Back into the Future: ILGA-Europe before 1996." *Destination Equality: Magazine of ILGA-Europe* 11 (1): 5–8.

Price, Richard. 1998. "Reversing the Gun Sights: Transnational Civil Society Targets Land Mines." *International Organization* 52 (3): 613–44.

Seckinelgin, Hakan. 2009. "Global Activism and Sexualities in the Time of HIV/AIDS." *Contemporary Politics* 15 (1): 103–18.

Ssebuyira, Martin, and Risdel Kasasira. 2014. "I'll Do Business with the Russians Instead, Museveni Tells Obama." *Africa Review*, February 24, 2014. http://www.africareview.com/News/-/979180/2219142/-/bht82z/-/index.html (accessed July 31, 2018).

Stoeckl, Kristina. 2016. "The Russian Orthodox Church as Moral Norm Entrepreneur." *Religion, State and Society* 44 (2): 132–51.

Stoeckl, Kristina, and Ksenia Medvedeva. 2017. "Double Bind at the UN: Liberal Democratic States, Russia and the Traditionalist Agenda." Presented at the *European Consortium on Political Research Annual Meeting* in Oslo, Norway, September 7, 2017.

Swiebel, Joke. 2009. "Lesbian, Gay, Bisexual and Transgender Human Rights: The Search for an International Strategy." *Contemporary Politics* 15 (1): 19–35.

Swimelar, Safia. 2016. "The Struggle for Visibility and Equality: Bosnian LGBT Rights Developments." In *The EU Enlargement and Gay Politics*, edited by Koen Slootmaeckers, Heleen Touquet, and Peter Vermeersch, 175–202. Basingstoke, UK: Palgrave Macmillan.

Symons, Jonathan, and Dennis Altman. 2015. "International Norm Polarization: Sexuality as a Subject of Human Rights Protection." *International Theory* 7 (1): 61–95.

Weiss, Meredith L., and Michael J. Bosia. 2013. *Global Homophobia: States, Movements, and the Politics of Oppression*. Urbana-Champaign, IL: University of Illinois Press.

Wilkinson, Cai. 2014. “Putting ‘Traditional Values’ Into Practice: The Rise and Contestation of Anti-Homopropaganda Laws in Russia.” *Journal of Human Rights* 13 (3): 363–79.

Wilkinson, Cai, and Anthony J. Langlois. 2014. “Special Issue: Not Such an International Human Rights Norm? Local Resistance to Lesbian, Gay, Bisexual, and Transgender Rights – Preliminary Comments.” *Journal of Human Rights* 13 (3): 249–55.

Wilson, Angelia R. 2013. *Why Europe Is Lesbian and Gay Friendly (and Why America Never Will Be)*. Albany, NY: SUNY Press.