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**A Queer Critique of EU LGBT+ Rights Promotion in the rise of
the Anti-Gender Movement:
Internal Contradictions and External Challenges**

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Abstract

LGBT+ rights have emerged as a visible component of the European Union's normative agenda, both within its borders and in its relations with neighboring countries and beyond. Institutionalist analyses have noted how the EU increasingly presents itself as a guardian of human rights, embedding Sexual Orientation and Gender Identity, Expression and Sex Characteristics (SOGIESC) protections into legal instruments, policy frameworks, and enlargement criteria. However, this thesis critically interrogates the internal coherence and external projection of the EU's LGBT+ rights agenda, and how it affects queer communities within and outside the EU through a queer theoretical lens. Focusing on the dynamics and framework of norm diffusion (the main mechanism through which the EU promotes LGBT+ rights) this study explores how these rights are adopted, negotiated, and contested across the EU and its periphery. Drawing on Queer Theory and Postcolonial-based critiques from IR scholars (e.g., Thiel, Velasco, Puar, Rao, Butler, Walter), it challenges the assumption that EU-led LGBT+ rights promotion is ideologically neutral, culturally universal, or politically uncontested. It scrutinizes both the symbolic and instrumental uses of LGBT+ rights in EU policy-making and enlargement strategies, highlighting internal contradictions, selective enforcement, and the persistent vulnerability of these rights to politicization, especially amid democratic backsliding and anti-gender mobilization. This thesis shows that the EU's promotion of LGBT+ rights, while impactful, remains entangled in liberal, Eurocentric, and securitized frameworks that often instrumentalize queerness for geopolitical ends. Rather than offering fixed solutions, it argues for queering as a tool to disrupt liberal assumptions of rights and reimagine transnational solidarity beyond Eurocentric terms, grounded in mutual engagement, epistemic humility and intersectional and decolonial justice.

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Abbreviations

ACP: African-Caribbean-Pacific

AHA: Anti-Homosexuality Act

CEE: Central and Eastern European

CFR: Charter of Fundamental Rights of the European Union

CFSP: Common Foreign and Security Policy

COVID-19: Coronavirus Disease of 2019

CSOs: Civil Society Organizations

DEI: Diversity, Equity and Inclusion

DG JUST: Directorate-General for Justice and Consumers (European Commission)

ECJ: European Court of Justice

EDF: European Disability Forum

EEAS: European External Action in Service

EEC: European Economic Community

EIDHR: European Instrument for Democracy and Human Rights

EIGE: European Institute for Gender Equality

ENP: European Neighbourhood Policy

EP: European Parliament

EU: European Union

FFP: Feminist Foreign Policy

FRA: Fundamental Rights Agency

GD: Georgian Dream Party

GONGOs: Government Organized Non-Governmental Organizations

ID: Identity and Democracy

IGLYO: International Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Youth & Student Organisation

ILGA Europe: International Lesbian, Gay, Bisexual, Trans and Intersex Association Europe

IR: International Relations

LGBT+: Lesbian, Gay, Bisexual, Trans and Plus

LGBTI: Lesbian, Gay, Bisexual, Trans and Intersex

LGBTIQ: Lesbian, Gay, Bisexual, Trans, Intersex and Queer

MAGA: Make America Great Again

MEP: Member of the European Parliament

NGOs: Non-Governmental Organizations

NPE: Normative Power Europe

SOGIESC: Sexual Orientation, Gender Identity, Gender Expression and Sex Characteristics

TERF: Trans-Exclusionary Radical Feminist

TEU: Treaty on European Union

TFEU: Treaty on the Functioning of the European Union

Research Problem and Question

Since the early 2000s, and particularly following the adoption in 2000 and the later entry in force of the *Charter of Fundamental Rights of the European Union* (2009) and the Council of the European Union's non-binding *Guidelines to promote and protect the enjoyment of all human rights by lesbian, gay, bisexual, transgender and intersex (LGBTI) persons* (2013), the EU has increasingly positioned itself as a promoter of LGBT+ rights within the union. These initiatives have largely followed a top-down, institutionalist approach that has prioritized legal harmonization, anti-discrimination directives, and symbolic commitments over more transformative engagement with local civil society or structural inequality (Thiel, 2021).

At the same time, this commitment to promote LGBT+ rights has extended outward in its foreign policy through mechanisms such as enlargement conditionality or other conditionalities with third countries through development aid and trade agreements. In accession processes, LGBT+ rights have been instrumentalized as benchmarks of modernity and democracy. In external frameworks, ranging from the Post-Cotonou Agreement to the Eastern Partnership, compliance with LGBT+ rights has been framed as a condition for partnership and aid (Elgström, 2004; Altin, 2022). Such efforts, however, have faced significant criticism for advancing Western-centric, and technocratic visions of queer rights, disconnected from local contexts, historical context and lived experiences (Onyekachi, 2020). In both internal and external settings, this approach has often reduced LGBT+ rights to a checklist of legal reforms, rather than fostering meaningful cultural or political transformation.

Furthermore, the EU's internal inconsistencies, evidenced by the persistence of anti-gender rhetoric, illiberal populism, and democratic backsliding in member states like Hungary, Poland, Croatia, and even Italy, undermine its normative credibility (Ayoub & Stoeckl, 2024). Rather than being a linear process of rights expansion, LGBT+ rights in the EU remain contested, uneven, and reversible. This contradiction is mirrored externally, where promotion efforts have at times triggered backlash or been co-opted by authoritarian regimes to justify repression (Banerjee & Yesudas, 2024).

In today's context of post-COVID19 global instability, rising multipolarity, and the mainstreaming of nationalist, isolationist and anti-democratic agendas (Peters, 2023), these dynamics raise urgent questions not only about the effectiveness but also the underlying

assumptions of EU LGBT+ rights promotion. Has the EU's approach consolidated rights, or has it reinforced normative hierarchies, rigid identity categories and politics, and securitized discourses that marginalize dissident, intersectional, and postcolonial queer voices?

This thesis critically engages with these questions by applying Queer Theory to the analysis of EU LGBT+ rights promotion. It challenges the idea of the EU as a “normative power” and interrogates how its top-down strategies have shaped the discourse, implementation, and contestation of LGBT+ rights both within and beyond its borders. In this way, it will challenge the traditional EU institutionalist approach by asking the following research questions:

1. *How can Queer Theory help critically reframe the EU's approach to LGBT+ rights promotion in times of global democratic backsliding, anti-LGBT movements, and anti-gender mobilization?*
2. *What alternative strategies or principles could inform a more queered, intersectional, postcolonial, and solidaristic EU engagement with LGBT+ rights, both internally and externally, if any at all?*

Rather than accepting the EU's rights-based model as inherently emancipatory, this thesis explores whether it has entrenched liberal, Western-centric frameworks that may obscure or undermine more plural, intersectional, and transnational forms of queer justice. In doing so, the project seeks to envision if a queered EU policy approach is possible, and if any, if it can move beyond norm diffusion to embrace solidarity, reflexivity, and radical inclusivity.

Analytical Framework and Chapter Outline

This thesis will employ Queer Theory, Queer International Relations and Decolonial Theory as lenses to critically examine the EU LGBT+ Rights Promotion from a historical and chronological perspective, while mainly focusing on events and case studies taking place from 2020 to 2025. Throughout this thesis, when talking about *queer* or *Queer Theory*, it is important to understand the concept refers not to an identity per se (unlike the term LGBT), but it describes and refers to a perspective that challenges the identity-based and binary frameworks of heterosexuality/homosexuality and that questions sexual and gender norms (De Lauretis, 1991). By drawing on scholars such as Velasco, Thiel, Butler, Puar, Rao and Walter, this research will challenge the assumption that the EU stance as a norm diffuser of

LGBT+ rights is a neutral and effective strategy. Instead, it will explore how its instruments for protecting and promoting LGBT+ rights could embrace more intersectional, desecuritized, and locally responsive and informed approaches. The thesis will be structured in the following chapters:

1. **Queering Norm Diffusion: Theoretical Foundations and Conceptual Framework:** This chapter will explore the concept and the history of norm diffusion within the EU and in the international arena and spark a theoretical debate applying Queer Theory in the field, exploring critiques of norm diffusion and the potential for a queered approach to EU promotion of LGBT+ Rights in its internal and foreign policy.
2. **Queering the House: Promotion of LGBT+ Rights in the EU, Historical Context and Recent Developments:** This chapter will trace the evolution of the EU's role as a norm promoter of LGBT+ rights within its own borders, highlighting key institutional developments and policies, as well as contemporary internal challenges such as backlash in Central and Eastern European (CEE) countries, including Poland, Hungary, and Bulgaria, but also beyond this region exploring cases like Italy and Croatia
3. **Queering the Neighbourhood and Beyond: EU Accession, Enlargement & Foreign Policy:** This section will assess the EU's influence on LGBT+ rights in candidate and neighboring countries, such as Ukraine, Georgia and Russia, examining the reception and contestation of norm diffusion and will also question the EU's Foreign Policy towards third countries in regards to the use of conditionality in agreements such as the Post-Cotonou Agreement to uphold LGBT+ rights in countries like Uganda and Ghana.
4. **The (Im)possibility of Queering EU Promotion of LGBT+ Rights? Recommendations & Reflections:** The final chapter will explore alternative frameworks for LGBT+ rights advocacy that do not rely on rigid norm diffusion but instead embrace different approaches. It will synthesize key findings and propose potential strategies for a more queered promotion of LGBT+ rights.

Methodology

This thesis employs a qualitative research design that integrates historical, policy, discourse, and philosophical analysis to examine the EU's promotion of LGBT+ rights in foreign policy.

Each analytical strand contributes to a layered understanding of the topic: historical analysis traces the colonial legacies and genealogies of gender and sexuality norms that shape contemporary global debates; policy analysis focuses on how EU instruments, such as external action frameworks, trade agreements, and human rights guidelines, incorporate (or fail to incorporate) SOGIESC rights; discourse analysis interrogates the narratives, framings, and rhetorical strategies used by EU institutions, member states, and counter-movements; and philosophical analysis, mainly grounded in queer theory for the purpose of this thesis, to challenge the normative assumptions behind linear, universalist models of norm diffusion and rights promotion.

The primary sources for this research include EU policy documents (e.g. the LGBTIQ Equality Strategy 2020–2025, Council Conclusions, External Action Guidelines) and public statements and resolutions from EU institutions (including the European Parliament and European External Action Service). These will be analyzed alongside reports from LGBT+ rights organizations (e.g. ILGA Europe, OutRight International), civil society submissions, media coverage (particularly from contexts like Uganda, Hungary, and the United Kingdom), and national court rulings and legislation relevant to SOGIESC issues. Secondary academic literature will contextualize and critically engage with all these materials.

By adopting a queer theoretical lens, this thesis interrogates the limitations of current EU practices, particularly the tendency to project a top-down, Eurocentric model of LGBT+ rights that may reinforce neocolonial dynamics. This perspective will guide the interpretation of all primary sources, highlighting tensions between institutional narratives and local realities, and between visibility and material safety. The methodology is thus designed not only to analyze how SOGIESC rights are promoted or resisted, but also to reimagine what transnational queer solidarity could look like in a multipolar and contested international landscape.

Chapter 1: Queering Norm Diffusion – Theoretical Foundations

This chapter sets the stage for the thesis by engaging with key theoretical debates in international relations, LGBT+ rights promotion, EU foreign policy, Queer and Postcolonial Theory. It critically examines the main EU framework of norm diffusion used to promote LGBT+ rights, highlighting its limitations. Drawing on insights from queer and postcolonial international relations scholars, the chapter challenges conventional approaches and proposes a perspective based on Queer Theory as a more inclusive alternative. By exploring the theory behind normative power, its successes, and its limitations, this chapter suggests a more nuanced and interwoven approach to the EU's promotion of LGBT+ rights.

From its inception, the European Union aspired to be a normative actor (Thiel, 2021), progressively establishing itself as a normative power with LGBT+ rights as a cornerstone of its external human rights agenda. This ambition is deeply rooted in the EU's self-image as a values-based actor committed to promoting equality, democracy, and human dignity worldwide (Skolimowska, 2015). A major milestone in this commitment came on 1 December 2009, when the Charter of Fundamental Rights of the European Union (CFR) became legally binding, explicitly prohibiting discrimination based on sexual orientation in its Article 21 (Eigenmann, 2022). Alongside this, the adoption of the Treaty on European Union (TEU) reinforced the EU's normative mission: The TEU formally articulates the EU's normative orientation: Article 2 outlines the Union's commitment to human rights, equality, and non-discrimination; Article 3(5) extends this mission to the global sphere; and Article 21 requires that EU external action promote human rights and fundamental freedoms. On paper, these provisions suggest a coherent framework for integrating LGBT+ rights into both domestic and foreign policy. However, the existence of legal commitments does not in itself "cement" these rights within EU policy. Rather, it provides a normative vocabulary that can be mobilized (but also selectively interpreted, sidelined, or contradicted) depending on political will, institutional dynamics, and external pressures.

In practice, the operationalisation of LGBT+ rights within EU foreign policy has been uneven and often instrumental. As Slotmaeckers (2020) argues, while the EU has positioned itself as a vocal global advocate for LGBT+ rights, this stance is shaped as much by geopolitical interests and identity construction as by consistent normative principles. Moreover, the

inclusion of sexual orientation and gender identity within the broader human rights framework remains politically contested among member states, with internal divisions undermining external coherence. Therefore, while the TEU offers a legal and institutional basis for LGBT+ rights engagement, it does not guarantee their prioritisation or effective implementation in practice. Instead, it reflects the tension between normative aspiration and political reality that characterises much of the EU's external action.

As it will be shown in this chapter, norm diffusion is often ineffective, and it frequently leads to unintended consequences and crackdowns on LGBT+ rights when external actors push back against what they perceive as Western impositions on sexual and gender norms. This chapter begins by outlining the theoretical foundations of the EU as a normative power and the logic behind its norm diffusion practices. It then engages with postcolonial critiques that highlight the neocolonial and asymmetric dimensions of norm transference, particularly in relation to LGBT+ rights promotion. Finally, the chapter introduces queer theory as a critical framework that challenges normative assumptions, setting also the stage for a queered perspective on EU foreign policy. Overall, this chapter will explore the theoretical limitations of norm diffusion and show how Queer Theory offers a more critical, flexible framework for rethinking EU foreign policy on LGBT+ rights.

1.1 The EU as a Normative Power and the Logic of Norm Diffusion

1.1.1 Defining Normative Power Europe (NPE)

The concept of Normative Power Europe (NPE), proposed by Ian Manners in the early 2000s, offered a new framework to analyze the position and power of the European Union as a geopolitical actor that did not fit the traditional understandings of power based on purely military or economic standards. NPE focuses on the EU's normative power: the capacity to influence international relations not through military or economic might, but through the moral appeal of its values and norms (Manners, 2002). Through the idea of Normative Power Europe, it is suggested that the EU's influence in global affairs arises from its ability to promote norms that are perceived as universally applicable, such as democracy, human rights, and equality (Manners, 2008). In the case of LGBT+ rights, this normative power is reflected in the EU's promotion of anti-discrimination laws and LGBT+ inclusion both internally and in its dealings with third countries (Mos, 2013).

The EU's commitment to LGBT+ rights is not simply a political stance but is increasingly institutionalized within its legal framework (Eigenmann, 2022; Ayoub, 2016). As mentioned before, the adoption of the CFR made it legally binding on all Member States to explicitly prohibit discrimination on the basis of sexual orientation, and, since EU membership nominally stipulates that internal human rights are sufficiently respected and should be promoted, this in turn has also triggered a notably increasing response on LGBT rights promotion in foreign policy affairs (Thiel 2017). This internal institutionalization which will be further discussed in the next chapter, has manifested itself through a growing number of policy documents covering SOGIESC within EU institutions (Eigenmann, 2022), while, on the other side, its external promotion through foreign policy has taken different shapes including diplomacy, development aid, and conditionality in trade agreements beyond Europe (Lalor, 2020), which are designed to pressure third countries into aligning with EU norms on LGBT+ issues, which reaffirms two ideas: firstly that the EU increasingly wants to become a norm-setter in this domain, as framed in the European Commission *2020-2025 LGBTIQ equality strategy* Pillar 4 where the EU explicitly aims to “Leading the call for LGBTI equality around the world” (2023), and, secondly, that LGBT+ rights promotion with a normative aim tends to be entangled with geopolitical offerings (Thiel, 2021) which further politicize the promotion of such rights.

In this way, the EU's normative power has been increasingly questioned mainly due to two factors: (1) its internal contradictions and (2) the resistance it faces externally. According to Thiel (2021), while the EU may seek to define what constitutes “normative” sexual identity in global politics, these efforts often encounter significant pushback from states that view LGBT+ rights as Western impositions incompatible with their own cultural values, not only from outside of the Union, but also within, clearly undermining its credibility and its potential to become a true promoter of LGBT rights in all domains.

1.1.2 Internal Tensions and Normative Inconsistencies

The EU's legal and institutional commitment to promoting LGBT+ rights faces substantial internal contradictions (Ayoub, 2019). Although the EU has championed equality and non-discrimination within its borders, internal dissent over LGBT+ issues persists. Some EU Member States, such as Poland, Hungary and Bulgaria have increasingly passed laws and policies in the last years that undermine the rights of LGBT+ individuals (Slavova, 2022; Grabowska-Moroz & Wójcik 2021; Nuñez-Mietz, 2019), creating a dissonance between the

EU's external rhetoric on LGBT+ rights and its internal practices. Seeing this current backlash and instability within the region, such a scenario creates a fertile argument for countries outside the EU to challenge its credibility and united stance in favor of LGBT+ rights when promoting them abroad, undermining its moral authority and thus weakening its normative power further. This tension between internal and external perceptions of the EU's normative power will be further developed in Chapters 2 and 3, where these contradictions and its impact on the EU's ability to successfully promote LGBT+ rights will be examined.

Last but not least, another layer of complexity is added when thinking about how the EU's normative power is shaped by its institutional hybridity. The Union is neither a traditional nation-state nor a purely intergovernmental organization, and this hybrid identity often leads to inconsistencies in its foreign policy (Vogler & Bertherton, 2006). These internal contradictions, alongside external resistance, have created tensions within EU foreign policy, undermining its ability to act as a coherent and credible normative actor on LGBT+ rights. These internal issues will be further explored in Chapter 2 focusing on the promotion of LGBT+ rights within the EU, but from this initial state of play, these contradictions already seem to expose a normative dissonance that limits the EU's credibility and authority in shaping international norms around SOGIESC.

At its core, norm diffusion operates through the assumption that certain human rights and identities are universal. Yet, as it will be explained in the following sections, both postcolonial scholars and queer theorists argue normativity itself is a tool of power; one that disciplines, excludes, and reinforces hierarchies rather than dismantling them, and that acts against the interest of the queer and marginalized communities themselves.

1.2 Critiques of Norm Diffusion: Postcolonial Perspectives

Beyond the internal inconsistencies discussed in the previous section, the EU's external promotion of LGBT+ rights has also been met with significant resistance and critique, raising deeper questions about its legitimacy and effectiveness. Scholars have highlighted how postcolonial and queer critique perspectives have increasingly problematized the EU's role as a normative power, particularly in its attempt to diffuse LGBT+ rights as universal values.

1.2.1 Postcolonial Critiques: Norm Diffusion as a Neocolonial Project

A central critique of the EU's normative power agenda in regards to foreign policy is that it reinforces neocolonial hierarchies, positioning Europe as a morally superior actor while casting non-European states as lagging behind in progress (Markos, 2020; Staeger, 2016; Filipescu, 2016). This framework reflects a civilizational discourse that echoes colonial-era justifications for intervention, where European states imposed their social and legal structures on non-European societies under the guise of modernization and progress (Khakee, 2022).

This critique is particularly relevant in relation to LGBT+ rights diffusion, where the EU's self-representation as an enlightened global actor constructs non-Western societies as sites of moral deficiency. Ni Mhaoileoin (2019) highlights how this Eurocentric vision erases non-European histories of gender and sexuality, portraying LGBT+ identities as strictly Western constructs while failing to acknowledge the historical role of European colonialism in criminalizing LGBT+ identities and same-sex relations in many regions of the Global South. Moreover, the circular reasoning of NPE's universality claim reinforces a neo-colonial hierarchy (Kangas, 2022) because the argument is built as it follows: because European LGBT+ norms are assumed to be universal, non-European states that do not adhere to them are seen as deviant or in need of correction. This logic automatically frames Africa, Asia, and other non-Western regions as lacking in normative progress. This frames a deficiency that the EU seeks to remedy through its foreign policy. As postcolonial scholars have noted on the norm diffusion of other human rights, this logic bears a disturbing resemblance to colonial paternalism (Staeger, 2016; Schmidt, 2012).

A key theorist in the critique of Western LGBT+ discourse is Jasbir Puar (2007, 2017), whose concept of *homonationalism* explores how LGBT+ rights are often co-opted into nationalist and imperialist projects. Although Puar does not specifically analyze EU norm diffusion, her critique of Western LGBT+ discourses aligns with postcolonial concerns over racialized hierarchies in human rights promotion. As Thiel (2021) argues, the EU's approach to LGBT+ rights positions itself as a successful model that has overcome its own past conflicts, assuming that third countries must follow the same trajectory towards modernity and democracy. However, this linear, Eurocentric vision of progress ignores the socio-political specificities of LGBT+ identities outside of Europe and fails to recognize Europe's own historical complicity in shaping homophobic legal structures through colonial rule that persist as of today.

1.2.2 The Power Asymmetries of Norm Transference

One of the key mechanisms through which the EU promotes its normative agenda is *transference*, which involves the exportation of EU norms through trade agreements, foreign aid, and diplomatic engagement (Manners, 2002). While Manners presents this process as a benign mechanism for international cooperation, postcolonial scholars argue that it mirrors colonial-era power asymmetries (Rutaziwa, 2010). This *transference* often works through economic incentives ("carrots") and political pressures ("sticks") that translate into soft coercion, compelling non-European states to align with EU norms in exchange for financial or diplomatic benefits.

Filipescu (2016) further critiques this dynamic, arguing that the EU's silent positioning as the standard-bearer of human rights reinforces a discursive hierarchy that portrays non-European actors as lacking moral and normative development. This orientalist framing places the EU in a position of ideological superiority, assuming that its norms are universal truths rather than culturally contingent values. Similarly, Khakee (2022) highlights how this moral hierarchy aligns with historical civilizational discourses, which framed Europe as the epicenter of progress while non-Europeans were deemed backward or deficient.

1.2.3 LGBT+ Rights Promotion and Backlash: A Strategic Rejection of Norm Diffusion

NPE creates a perfect setting for countries in the Global South to build resistance to norm diffusion as not merely an act of ideological opposition; but also as a way to strategically assert sovereignty. Governments in Uganda, Ghana, and Tanzania have actively framed the EU's LGBT+ rights agenda as a neocolonial attempt to undermine local cultures and political autonomy (Altman & Simons, 2016; Seay & Clark, 2024; Brown, 2024). By rejecting European norms, these governments not only resist external influence but also strengthen domestic political legitimacy, oftentimes authoritarian, by portraying themselves as defenders of traditional values against Western imperialism.

This backlash in other contexts, especially in Eastern Europe and Eastern Partnership countries, has also taken the form of securitization of the queer communities, in which political and religious actors have constructed the existence of LGBT+ people and rights as a threat to national sovereignty, cultural identity, and traditional values (Nuñez-Mietz, 2019). This process of securitization transforms LGBT+ visibility into a matter of national security, often entangled with discourses of foreign interference, Western imperialism, and moral

decline, enabling state and non-state actors to justify anti-LGBT+ legislation, surveillance, and repression under the guise of protecting the nation (Edenborg, 2023).

1.2.4 Queer Theory and Postcolonialism: A Common Critique

Just as postcolonial critiques highlight the neocolonial underpinnings of norm diffusion and how it backfires on the most vulnerable communities, Queer Theory challenges the heteronormative assumptions embedded in global LGBT+ rights promotion. While postcolonial scholars critique the racialized hierarchy of norm diffusion, queer theorists expose how rigid identity categories and Western-centric understandings of sexuality shape international LGBT+ rights discourse. Together, these perspectives reveal that the EU's promotion of LGBT+ rights is not merely a progressive human rights project but also a deeply political act of norm enforcement with strong neocolonial underpinnings.

As the next section will explore, these critiques underscore the need for a queered approach to LGBT+ rights norm diffusion, an approach that acknowledges historical legacies, local agency, and alternative frameworks of sexuality and rights beyond the Eurocentric model.

1.3 Queer Theory and its Challenge to Norm Diffusion

1.3.1 Queer Theory as a Critical Lens in International Relations

After discussing the limitations of norm diffusion theory and Normative Power Europe from a postcolonial perspective, particularly in the diffusion of LGBT+ rights, it is crucial to reconsider whether these frameworks can be improved or whether they are fundamentally flawed. While postcolonial critiques highlight the neocolonial dynamics embedded in norm diffusion, Queer Theory offers a radical challenge to the assumptions that are central to these frameworks. Specifically, it critiques the notion that LGBT+ rights represent a fixed set of universal norms that can be easily diffused across diverse cultures and societies. Queer Theory destabilizes the binary constructs that have long shaped gender and sexuality but also global politics, especially in foreign policy discussions, and calls for a more nuanced understanding of concepts that build binary, good and bad, reductionist frameworks.

Queer International Relations (IR) scholars have long questioned binary thinking, a key feature of traditional approaches to global politics. Drawing on the work of theorists like Judith Butler (1990) and Eve Kosofsky Sedgwick (1990), Queer Theory started its journey by

pointing at the *inherent fluidity* of gender and sexuality, challenging the rigid categories that have dominated discourse. Sedgwick, for instance, critiques the overdetermination of the heterosexual/homosexual binary as a fundamental aspect of identity formation, stating that: "Many of the major nodes of thought and knowledge in twentieth-century Western culture... are structured – indeed, fractured – by a chronic, now endemic crisis of homo/heterosexual definition" (Sedgwick, 1990, p. 1).

Building on these ideas and transitioning Queer Theory more directly to the political and institutional field, Michael Warner (1993) introduced the concept of *heteronormativity*, a term used to describe how societal structures, norms, and institutions assume heterosexuality as the default, natural, and privileged sexual orientation. This pervasive heteronormativity shapes laws, cultural practices, and everyday interactions, reinforcing the binary idea that anything outside of heterosexual norms is deviant or "other." Contemporary queer theorists such as Berlant and Warner (1998) and Carroll (2012) further emphasize how heteronormativity permeates all aspects of social and political life, from the nation-state to commerce and law.

This focus on rigid binaries and imposed heteronormativity is particularly pertinent to EU foreign policy, where, for example, in multiple debates on the state of LGBT rights at the European Parliament have categorized countries of the Global South as either "progressive" or "backwards" based on European LGBT+ rights standards (Eigenmann, 2022). These binary framings risk reinforcing neo-imperialist narratives that position the Global North as the moral authority on LGBT+ issues, while simultaneously overlooking the local histories, struggles, and epistemologies that shape the experiences and understandings of gender and sexuality in different contexts. This reductionist approach not only simplifies complex global dynamics but also marginalizes non-Western perspectives and struggles, further entrenching the power imbalance between the Global North and the Global South.

Queer theory therefore rejects the hegemonic imposition of norms and instead advocates for solidarity-based and postcolonial approaches to understand and attain LGBT+ rights beyond the Western sphere (Ravecca & Upadhyay, 2013). If applied to the field of promoting LGBT+ rights, it would ask how gendered and sexual norms shape national and foreign policy and how they are promoted as such. Queer IR scholars have pointed out how out of focus it is to merely export Western conceptions of LGBT+ rights while Queer Theory mainly calls for engagement with local LGBT+ communities and always in a postcolonial and context-sensitive manner (Rao, 2020; Rao 2014).

Queering Foreign Policy: Moving Beyond Norm Diffusion

More specifically, a queered approach to foreign policy would reject the top-down imposition of LGBT+ rights and instead focus on collaborative engagement with local communities to understand what are their real needs as a collective. Not only this, but it would also question the source of such imposition coming from political spheres and power structures because it interrogates how such a diffusion of LGBT+ rights would stem from liberal institutions that do not challenge dominant heteronormative structures but instead adhere to them (Dahwan 2016). Queer theorist Duggan (2003) coined the concept of *homonormativity* to better understand such an scenario, in which she criticizes the assimilation of queer people and LGBT rights to the heterosexual realm and institutions, and as such, risk at reproducing liberal power structures. This includes the marketization of rights, where LGBT+ inclusion is framed in terms of consumption-based social orders, as it takes diverse forms such as gay tourism and corporate Pride sponsorships (Weiss, 2018). On the other side, further queer marxist readings would also question the relationship between the attainment of certain LGBT+ rights (such as the same-sex marriage, right to adoption, employment protections among others) to the assimilation of the community to reproduce the machinery of the capitalist state and its neoliberal mission (Raha, 2019).

In this line, Nancy Fraser (2020) and Judith Butler (1990) have debated the balance between socio-cultural recognition and economic redistribution in LGBT+ politics. While the EU rhetorically supports LGBT+ recognition, its neoliberal economic model often fails to promote economic and social justice for marginalized queer communities (Thiel, 2015). Instead, the EU's approach could be seen as a more *homonormative* one, as it tends to instrumentalize LGBT+ rights as a tool for market legitimacy, reinforcing its single-market agenda rather than genuinely transforming global inequalities (Thiel, 2021).

This phenomenon is evident in the EU's external relations, where LGBT+ rights are often promoted as part of a "civilizing mission" (Delatolla, 2020), what has been described by queer scholars as one of the main components of *homonationalism*. *Homonationalism* refers to the selective inclusion of LGBT+ rights within nationalist and imperialist agendas, where queer identities are aligned with state power to reinforce Western superiority while marginalizing racialized and non-Western others (Puar, 2007). Such instrumentalization occurs in Western states, where LGBT+ rights have been used to legitimize militarization and

imperialism, and this case has been particularly studied in narratives that justify intervention in Muslim-majority countries on the grounds of protecting queer communities (Ibid.)

Foucault's (1977) concept of normalization helps explain how LGBT+ rights discourse has been incorporated into EU foreign policy in ways that standardize a particular version of queer politics while excluding more radical or intersectional perspectives. He describes normalization as a practice that both "imposes homogeneity" and produces subjects according to dominant power structures (Foucault, 1977, p. 184). This aligns with critiques of Normative Power Europe discussed in the previous section, which argue that the EU positions itself as the ultimate authority on universal norms, ignoring the colonial legacies embedded in its policies.

1.3.2 Queer Critiques of Normativity and the Normal

Critiques of the norm, normality, and normativity have occupied a central place in queer studies, stemming from critical disability, to transgender and postcolonial studies (Thomson, 2017; Spade, 2015; Carter, 2007) they all have questioned how norms structure power relations. The concept of the "normal" is intimately tied to Western modernity and the Westphalian formation of nation-states (Stephens, 2007), which are key elements to understand the current functioning of the EU.

Within EU foreign policy, we have seen attempts to make NPE more inclusive by integrating gender equality and LGBT+ rights into policy frameworks, such as Feminist Foreign Policy (FFP). Sweden's Foreign Secretary Wallström introduced FFP in 2014, advocating for: (1) Protecting women's rights, (2) Promoting and increasing resources for gender equality, (3) Increasing women's representation in global politics (Rosén Sundström, 2023). This foreign policy found its way inside the EU foreign policy realm, with multiple references to it and a more gender-sensitive language and policy within EU institutions, even though it has yet to be fully embedded (Guerrina et al., 2023). This example of a FFP remains paramount to be analyzed through queer theory, since it is inherently interdependent with feminist theory (Butler, 1990)

Even if FFP materialized in an increased number of women and feminist discourses in EU institutions (Rosén Sundström, 2023), some feminist thinkers argue that FFP remains limited because it fails to challenge the EU's neoliberal, neo-colonial structures (Haastrup et al.,

2021). At the end, the EU's external relations strategies reinforce existing power hierarchies, rather than dismantling them. Additionally, its LGBT+ rights promotion often follows a liberal feminist approach that focuses mainly on legal inclusion rather than addressing intersectional inequalities (Bacchi, 2012).

Thus, while queer and feminist theories could inform a more radical transformation of EU foreign policy, the current application of these ideas remains superficial and stuck in an institutional structure that has not openly spoken about dismantling current systems of oppression or effectively including the needs of the community on the ground beyond legal inclusion. If the EU is to move beyond the top-down norm diffusion model, it must engage with queer activism in the ways it was conceived since its conception: by rejecting homonormativity, challenging neoliberalism and global patriarchy, and prioritizing intersectionality (Duggan, 2003; Cohen, 1997).

Encompassing postcolonial critiques that expose the geopolitical inequalities embedded in norm diffusion and who, which subject, is being normalized, queer theory fundamentally challenges the EU's approach to norm diffusion and NPE by directly questioning what is being normalized in the first place and how this normalization is being promoted, and who institutionally benefits from their promotion. Instead of imposing fixed norms, a queered foreign policy would prioritize context-sensitive, intersectional engagement with local activists. It would also critique the neoliberal and neocolonial underpinnings of EU foreign policy, ensuring that LGBT+ rights promotion is not just a tool for geopolitical legitimacy, but part of a broader effort to dismantle systems of oppression in global politics.

As such, it has been even questioned whether international relations, and thus, foreign policy can be queer at all due to the fact that both belong to very different realms (Rao, 2018). Taking a more nuanced stance and taking lessons from Queer Theory, I will argue that, against the struggle to dismantle such a system that clearly meets different incompatibilities with Queer Theory, EU international relations, its promotion of LGBT+ rights and more specifically, EU foreign policy, can at least be queered up to some extent, and there is value in holding such a dialogue, as it will be seen in the following chapters.

1.4 Conclusion: Towards a Queered EU Promotion of LGBT+ Rights and Foreign Policy

This chapter has critically examined the limitations of norm diffusion as a framework for promoting LGBT+ rights within and outside the EU, revealing its inherent contradictions, neocolonial tendencies, and geopolitical entanglements. While the EU positions itself as a normative power that champions LGBT+ rights globally, its approach remains constrained by internal inconsistencies and external resistance. The internal tensions between Member States undermine the EU's credibility as a uniform promoter of human rights, while external critiques, particularly from postcolonial and queer perspectives, expose how norm diffusion often replicates hierarchical power structures rather than fostering genuine equality.

Queer Theory offers a radical rethinking of these dynamics by challenging the very foundation of norm diffusion and exposing its embedded biases. Rather than treating LGBT+ rights as a universal, fixed standard to be imposed from the top down, queer theory advocates for a more fluid, context-sensitive, intersectional and postcolonial approach. This approach would prioritize collaboration with local movements, acknowledge diverse epistemologies of gender and sexuality, and resist the instrumentalization of LGBT+ rights for geopolitical purposes. A queered foreign policy would reject the assimilationist logic of homonationalism and instead embrace strategies that empower marginalized communities without reinforcing Western hegemony.

In the next chapters, this discussion will be expanded through an analysis of both the EU's internal promotion of LGBT+ rights and its external foreign policy mechanisms. Using case studies from the past decade, these chapters will illustrate the persistent gaps in norm diffusion, particularly in contexts where EU policies have struggled to achieve their intended outcomes. By critically engaging with these real-world examples, the thesis will explore and develop policy recommendation on how a queered approach to EU foreign policy would look like and how it could provide a more effective and ethically grounded alternative, ultimately moving beyond the limitations of normative power and toward a truly inclusive and decolonized vision of LGBT+ rights advocacy.

Chapter 2: Queering the House: Promotion of LGBT+ Rights in the EU, Historical Context and Recent Developments

As explored initially in Chapter 1, The European Union has played a significant role in shaping the protection and promotion of LGBT+ rights within its borders. While the journey towards inclusivity has been slow and uneven, the EU has emerged as a key actor in advancing equality, diversity, and the protection of LGBT+ individuals at the international arena. However, despite these advancements, significant challenges remain, particularly in the face of rising opposition with a significant regional element in Central and Eastern European (CEE) countries but also in rising far-right parties getting to power across the entire continent. In the past 20 years LGBT+ rights have become a battleground, exposing the contradictions within the EU itself: where legal protections are enshrined, yet political and societal resistance persists. This chapter traces the EU's historical journey towards LGBT+ equality, the institutional developments that have facilitated this journey, and the contemporary challenges it faces, from CEE states to rising anti-gender, anti-democratic and anti-LGBT+ political actors across the country.

It starts with the historical evolution of LGBT+ rights promotion within the EU, from early marginalization to the gradual institutionalization of equality norms. It then examines recent policy strategies and institutional mechanisms, highlighting both advancements and enduring contradictions. The chapter moves on to analyzing contemporary challenges and backlash across member states, through case studies illustrating how resistance to LGBT+ rights contests the EU's normative coherence from both its periphery and core. In doing so, its final aim is to explore the EU's internal strategies for managing and promoting LGBT+ rights while questioning its successes and challenges to better understand the external perceptions that third countries have over Europe when it portrays itself as a promoter of LGBT+ rights at home, but also abroad.

2.1. Historical Evolution of LGBT+ Rights Promotion in the EU

2.1.1 Early Invisibility: LGBT+ Rights at the Margins of European Integration

The history of LGBT+ rights promotion in the European Union reflects a broader narrative of gradual inclusion, reactive institutionalization, and identity-building through norm externalization (Thiel, 2021). For much of its early existence, the European Economic Community (EEC), which was the EU's predecessor, was primarily focused on economic cooperation (Kennedy & Webb, 1990). Social policy, let alone sexual or gender identity, remained peripheral to its foundational objectives. Any SOGIESC issues were virtually absent from the founding treaties, reflecting both the conservative social climate of post-war Europe and the political sensitivities around non-normative sexualities in many member states (Thiel et al., 2023).

It was only in the late 1980s and 1990s that a shift began to take place, catalyzed by transnational LGBT+ activism, evolving jurisprudence, and a broader human rights discourse (Ayoub, 2013). This period also coincided with a growing internal interest in developing a distinctly European political identity rooted in liberal democratic values, especially in the wake of German reunification and the post-communist transformations in Central and Eastern Europe (Fuchs & Klingemann 2002; Lehning, 2001).

As Thiel (2021) argues, from there we can trace a construction of a European identity that is closely tied to processes of differentiation, of defining what the EU *is* by simultaneously defining what it is *not*, an idea strongly embedded in what Queer Theory identifies as the imposition of *binarism heteronormativity*, an othering as a way to sustain power structures (Warner, 1993). As such, in the new millennium LGBT+ rights began to emerge not only as a legal and normative issue but also as a symbolic boundary marker of European modernity and liberalism (Graham, 2009), distinguishing “progressive” Europe from the “backward” or “traditionalist” other, often positioned in the East or beyond.

2.1.2 From Discrimination to Protection: The Treaty of Amsterdam and Lisbon

A major institutional breakthrough came with the adoption of the Treaty of Amsterdam in 1997 (Council of the European Union & European Union), which inserted Article 13 (now Article 19 TFEU) into the treaty framework. This provision allowed the EU to "take appropriate action to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation." The inclusion of sexual orientation was

significant, marking the first time the EU acquired an explicit legal basis to combat homophobic discrimination.

However, this expansion of competence was far from automatic or uncontested. As Ayoub (2013) highlights, this period was characterized by a form of Europeanization of LGBT+ rights and norms, that would contribute to a level policy change that would be minimal and outpaced by hard enforcement. Europeanization generally refers to the processes through which formal and informal rules, procedures, shared norms, and collective beliefs are developed, spread, and embedded, particularly as part of EU policy making, and subsequently integrated into the national policies and public discourse of member states (Featherstone & Radaelli, 2003). For example, the Directive 2000/78/EC, which prohibited discrimination on the grounds of sexual orientation in employment, was one of these milestones that ended up permeating in member states. However, from a queer perspective, it is interesting to note both how directives are tools of slow compliance achievement in comparison to regulations (Scheppelle et al., 2020) while, at the same time, such measures still mainly focused on fields more related to the production of capital and liberalism such as the workplace, excluding other critical areas like education, healthcare or other social provisions who still escape EU-level harmonization.

It was only with the entry into force of the Lisbon Treaty in 2009 that a more consolidated normative framework began to take shape. As discussed in Chapter 1, the Treaty made the Charter of Fundamental Rights legally binding, thereby extending the EU's legal authority in matters of equality. Article 21 of the Charter explicitly prohibits “any discrimination based on any ground such as sex, race, colour, ethnic or social origin... or sexual orientation.” Importantly, this provision applied not only to EU institutions but also to national governments when implementing EU law (De Schutter, 2014), opening new legal pathways for rights claims and enabling the European Court of Justice (ECJ) to play a more active role in shaping LGBT+ jurisprudence across the Union.

Yet, it is crucial to highlight once again that EU legal and political mechanisms that, while effective in extending reactive protections around rights to privacy, employment, and non-discrimination, often stop short of actively promoting normative change in the social and cultural spheres. These rights are framed primarily in relation to market participation and individual freedoms, boasting a neoliberal governmentality and mentality around LGBT+ rights rather than advance in terms of societal transformation, inclusion or the affirmation of

diverse identities (Muehlenhoff, 2019). In this context, queer theory again offers a critical lens. Drawing on Judith Butler's insights, particularly from *Undoing Gender* (2004), it is important to highlight how legal recognition can be understood as a double-edged sword: while it offers protection, it simultaneously reinforces normative boundaries by recognizing only certain identities and modes of being as intelligible within the legal and political order. In this way, the law becomes a regulatory mechanism that governs the conditions under which gender and sexuality can appear as legitimate (in this case including those that benefit the market and adapt to the institutional power structures) but still often excluding those who fall outside binary or normative frameworks. This embedment of queer people into political and supra-institutional bodies such as the EU also offers an easier target for anti-democratic and anti-European forces in return (Thiel, 2021), as it will be explored down the road in this chapter.

However, as Slootmaeckers et al. (2016) argue, the expansion of LGBT+ rights in the EU cannot be understood merely as a top-down institutional initiative driven alone by political elites. Rather, it was co-constituted by the active engagement of transnational LGBT+ networks, activists, and strategic litigation actors who saw the EU not only as a norm-exporting institution but also as a strategic venue for rights-based mobilization. These civil society actors played a crucial role in legitimizing the EU's identity as a normative power in the field of LGBT+ rights, endorsing its leadership on the international stage. However, this convergence also introduced tensions, as the EU's LGBT+ rights agenda has often prioritized issues compatible with a liberal rights framework, such as anti-discrimination protections or marriage equality, over more radical transformations of social, economic, or political structures.

Thus, although we can trace a significant expansion of rights, we can also see the stark limits of the EU's juridical model of inclusion. The EU's focus on privacy, employment, and market citizenship reflects its broader institutional logic, where LGBT+ rights are largely accommodated insofar as they align with existing competencies and economic paradigms. This pinpoints the persistent gap between protection and promotion, a gap that queer theory urges us to interrogate by asking not just who is protected by law, but what kinds of lives and identities are rendered thinkable and grievable, particularly through the EU's legal and political structures.

Importantly, queer theory has long challenged this mainstreaming of LGBT+ politics. Often aligned with more Marxist or anti-capitalist critiques, queer theory resists the normalization and assimilationist logic that underpins much of contemporary LGBT+ rights discourse (Duggan, 2002; Warner, 1999). It interrogates the neoliberal co-optation of sexual politics, where recognition is conditional on market participation, national loyalty, or respectability, rather than on a dismantling of systemic inequalities (Eng & Halberstam, 2005). From this perspective, demands like marriage equality, adoption or military inclusion, which are considered hallmarks of Western imaginaries rights agenda, are seen as forms of “homonormativity” (Duggan, 2002), as they replicate heteronormative values while leaving broader structures of inequality intact, imaginaries that the EU risks to replicate. Furthermore, within queer communities themselves, there exists a wide spectrum of ideological and political positions, from liberal inclusion to radical resistance, which further complicates the EU’s efforts to project a unified rights agenda. Therefore, the EU’s role as an LGBT+ rights promoter must be understood as shaped not only by institutional dynamics and geopolitical interests but also by these internal debates and ideological fissures.

2.1.3 Enlargement as a Catalyst for Norm Externalization

One of the most paradoxical yet consequential engines for LGBT+ rights promotion in the EU has recently been its enlargement policy. As argued in “Constructing EU Identity through LGBT Equality Promotion” (Slootmaeckers, 2020), LGBT+ rights emerged as a *proxy* for modernity, liberal democracy, and European belonging during the accession process of Central and Eastern European states.

In the context of post-socialist transformation, candidate countries such as Poland, Hungary, Croatia, and Romania were subjected to a complex conditionality regime that included alignment with the Copenhagen Criteria, one of which was respect for minority rights (Conant, 2014). While LGBT+ rights were not originally an explicit criterion, they increasingly came to be interpreted as part of the broader human rights consensus for accession.

This development was not just normative but deeply political. In its action, the EU is observed to have engaged in what has been coined as “*shifting othering processes*” (Slootmaeckers, 2020), where the East was constructed as the “illiberal other” that needed to be reformed, disciplined, and brought into alignment with European values. LGBT+ rights

thus became one of the tests to value whether a candidate country was “European” enough to join the Union”

Crucially, this norm externalization was often top-down and strategic. Ayoub (2015) notes that LGBT+ rights promotion during enlargement was largely elite-driven, with new-adopter states seeking policy adoption as a means to gain external legitimacy and improved reputation rather than deep social internalization. As such, many CEE governments adopted anti-discrimination laws and policies with limited intention of full implementation, treating them as necessary boxes to check on the path to membership.

Indeed, as soon as EU conditionality pressures in relation to protection and anti-discrimination of LGBT+ people receded post-accession, immediate backlash emerged as it will be further explained in section 2.3 and 2.4.

2.1.4 Identity Politics and the Strategic Use of LGBT+ Rights

Parallel to legal and policy developments, the EU's promotion of LGBT+ rights became increasingly entangled with the project of constructing a common European identity. This identity was built not only on economic or legal integration but also on a shared commitment to liberal democratic values, including gender equality and sexual diversity.

Thiel (2021) argues that the EU has often pursued identity through negative integration; by defining what it is not. In the 2000s and 2010s, the LGBT+ rights agenda became an important symbolic terrain on which this identity was performed. The EU positioned itself as a bulwark against rising nationalism, traditionalism, and illiberalism, both within and outside its borders.

This symbolic elevation of LGBT+ rights was visible in European Parliament resolutions, diplomatic actions, and the presence of LGBT+ issues in the EU's external relations, including trade and development (Eigenmann, 2022). Yet this performative identity construction was not without costs, since the framing of LGBT+ rights as a top-down European imposition often provoked backlash in candidate and member states, where nationalist actors exploited these issues to reject foreign interference (Slootmaeckers, 2020)

Indeed, this tension continues to shape the contemporary EU landscape. On one hand, LGBT+ rights are increasingly central to the EU's self-image and foreign policy discourse.

On the other hand, the instrumentalization of LGBT+ issues in identity politics risks exacerbating Western and non-Western divides and undermining long-term norm diffusion.

Overall, the historical trajectory of LGBT+ rights promotion in the EU illustrates a complex interplay between legal evolution, identity politics, and geopolitical strategy. What began as a marginal issue has, over the past three decades, become a litmus test of the EU's commitment to fundamental rights. This evolution has been shaped by strategic litigation and the gradual expansion of legal protections; transnational activism across the continent key to achieving policies addressing the LGBT+ community, enlargement dynamics that externalized norms to the East; and a growing emphasis on LGBT+ rights as symbols of European identity.

However, the EU's approach has also revealed key limitations. Its reliance on symbolic politics, soft law, and elite-driven conditionality has left many gains vulnerable to rollback, particularly in member states where social acceptance of LGBT+ people remains low.

The next sections of this chapter will explore how these historical developments inform the EU's current institutional strategies, the challenges posed by illiberal resistance in countries like Poland, Hungary, and Bulgaria, and the impact these dynamics have on the EU's internal cohesion and external credibility.

2.2 Institutional Developments and Strategies

2.2.1 Introduction: From Norm Emergence to Institutionalization

The development of institutional strategies promoting LGBT+ rights within the EU has followed a trajectory from soft norm articulation to more comprehensive policy frameworks. Unlike the relatively ad hoc and reactive early responses of the 1990s and early 2000s, the post-Lisbon Treaty period saw a turn toward systematic planning, structured implementation, and transnational coordination. EU Institutional actors have increasingly embraced the direct promotion of LGBT+ equality as part of their mandate, both in internal governance and external relations. To name a bit of the chronologic evolution it is important to mention: the Guidelines to Promote and Protect the Enjoyment of all Human Rights by LGBTI Persons (2013); List of Actions to advance LGBTI Equality (2015-2019); EU LGBTIQ Strategy (2020-2025) and the Gender Equality Strategy (2020-2025).

Yet, as scholars such as Sloomaeckers (2020) and Ayoub (2013) observe, this institutionalization has not been purely technocratic or normative; it has been deeply embedded in the EU's broader project of identity construction, normative power projection, and responses to internal contestation. The increasing centrality of LGBT+ equality in the EU's self-presentation has spurred not only policy innovation but also symbolic and discursive strategies that shape the current EU's political landscape.

Given the length of this thesis, this section will only analyze the most salient institutional developments through two core frameworks: the List of Actions to Advance LGBTI Equality (2015–2019) and the LGBTIQ Equality Strategy (2020–2025). Both reflect different phases of EU engagement: the former represents a preliminary, soft-law approach to LGBT+ inclusion; the latter articulates a firmer political and strategic stance, reflecting lessons learned from both success and backlash; but still both facing several limitations in implementation, advancing queer rights and missing concepts from postcolonial and queer critiques.

2.2.2 The 'List of Actions to Advance LGBTI Equality' (2015–2019)

The 2015–2019 List of Actions to Advance LGBTI Equality was the first coordinated effort by the European Commission to consolidate and guide LGBT+ related work across different policy areas (Kazlauskaitė, 2022). Although not legally binding, this initiative reflected a shift toward policy mainstreaming, with commitments going beyond the more economical and private realms spanning anti-discrimination to education, health, asylum, and foreign affairs.

The List contained 24 concrete actions aimed at strengthening protections against discrimination and violence, promoting inclusive education, collecting disaggregated data, and increasing awareness of the rights of LGBTI persons. Importantly, the document emphasized intersectionality, recognizing how sexual orientation and gender identity intersect with other axes of marginalization (e.g., race, disability, age).

Scholars such as Eigenmann (2019) view this moment as a key institutional turning point, when EU bodies moved from rhetorical support toward a coordinated, interdepartmental approach. They emphasize the role of transnational activism in pressuring the Commission into action, especially through policy entrepreneurship and validation by civil society

organizations like ILGA-Europe. The List of Actions, while limited in legal force, created new institutional routines and expectations, embedding LGBT+ concerns into the EU's administrative apparatus.

However, critiques emerged regarding the voluntarist and non-binding nature of the EU framework on LGBTI equality, alongside the lack of enforcement mechanisms, which meant that implementation varied significantly across the EU. This reflects the persistent fragmentation of member state commitments to LGBT+ equality. Evelyne Paradis, Executive Director of ILGA-Europe, stated: “Whilst we always welcome new actions taken by EU institutions towards LGBTI equality, we have to express our disappointment with the document which falls short of proposing serious new actions to tackle the ongoing discrimination, violence and stigmatization that LGBTI people continue to face on a daily basis” (Euractiv, 2015).

Despite its limitations, the List of Actions laid important groundwork. It institutionalized LGBT+ rights promotion as a multi-level governance task, encouraged inter-agency coordination (e.g., between DG JUST, FRA, EIGE), and aimed to mainstream LGBT+ inclusion within broader human rights and equality workstreams.

2.2.3 The LGBTIQ Equality Strategy 2020–2025: A Shift Toward Political Assertiveness

Unveiled by the Von der Leyen Commission in November 2020, the LGBTIQ Equality Strategy 2020–2025 represented a pivotal evolution in the EU's equality agenda. It reflected a deliberate political response to the rise of illiberalism and anti-LGBTIQ policies in countries such as Poland and Hungary (ILGA-Europe 2021; Kuhar & Paternotte, 2017), and marked a departure from earlier, more technocratic initiatives such as the List of Actions 2015–2019 (Thiel, 2021). For the first time, LGBTIQ rights were positioned as a core element of the Union's constitutional identity, explicitly tied to values of democracy, inclusion, and the rule of law.

The Strategy structures EU action along four central pillars: tackling discrimination; ensuring the safety of LGBTIQ people; building inclusive societies; and promoting LGBTIQ equality globally. Key proposals include extending the list of EU-recognized crimes under Article 83(1) TFEU to include hate crimes and hate speech targeting LGBTIQ people, as well as

promoting mutual recognition of same-sex parenthood across member states. Importantly, the Strategy extends its reach beyond internal policy, calling for the integration of LGBTIQ rights in enlargement policy, trade agreements, and external diplomacy, thereby reinforcing the EU's role as a normative actor on the global stage.

This pivot reflects what Thiel (2021) has described as a process of “normative thickening”: an internal consolidation where previously peripheral issues such as LGBTIQ rights become more central to the EU's self-narration as a community of values. This gives us once more an argument that LGBT+ equality is increasingly becoming a bigger battleground in the contest over European identity and democratic legitimacy.

Even though the strategy seems more up-front about the challenges that the queer community faces, this heightened ambition has exposed underlying structural and strategic limitations. Civil society organisations, including ILGA-Europe and the European Disability Forum (Felix, 2024), have acknowledged the strategy's symbolic weight but point to significant implementation gaps. In particular, the European Disability Forum (EDF) has raised concerns about the lack of intersectionality and accessibility, noting that the Strategy, for example, largely fails to address the lived realities of LGBTIQ people with disabilities or racialized others. Despite rhetoric around inclusivity, national action plans and EU-level initiatives often remain siloed, rarely engaging with overlapping forms of marginalisation such as disability, race, migration status, or class.

The EDF has also emphasised the absence of concrete, binding commitments, particularly in areas outside of employment and privacy, such as access to education, healthcare, housing, and political participation. It warns that without clear monitoring frameworks, inclusive consultation processes, and dedicated funding, the Strategy risks becoming aspirational rather than transformative. Additionally, existing mechanisms for civil society engagement tend to prioritise well-established NGOs, making it difficult for smaller, community-led organisations to access support or shape policy meaningfully.

These critiques have become particularly salient as the Commission begins work on the EU LGBTIQ equality strategy for 2026-2030. In its 2024 call for feedback and consultation, the Commission invited stakeholders to assess the achievements and shortcomings of the current framework and outline future priorities. As the Call for Evidence (European Commission, 2025) for the new strategy is rolling in, it highlights the rise of anti-gender and anti-LGBTIQ

narratives and the increase of hate motivated harassment and sexual and violent attacks in comparison to 2019 indicators, with also an increase in online violence, clearly pointing to the shortcomings of the previous strategy. While it is still to be seen what measures and recommendations will be finally adopted in the new strategy they mentioned that “possible actions include: (i) improving legal protection; (ii) monitoring the enforcement of existing EU legislation; (iii) running awareness-raising campaigns; (iv) bringing together stakeholders; (v) providing financial support to civil society organisations; and (vi) improving the collection and use of equality data”; thus with such vague language it is not providing much substantial change to the measures taken and the criticism faced by the previous strategy.

2.2.4 Beyond the Commission: the Role of the European Parliament and Fundamental Rights Agency

In parallel with Commission strategies, the European Parliament (EP) has played a significant role as an agenda-setter and norm entrepreneur. The EP has passed numerous resolutions condemning homophobia, transphobia, and state-led repression in member states, often going beyond what the Commission or Council were willing to voice.

For instance, the EP’s 2021 resolution declaring the EU an “LGBTIQ Freedom Zone”¹ was a direct response to Poland’s “LGBT-free zones” and Hungary’s discriminatory legislation. Although non-binding, this discursive move sought to reassert EU identity and create moral pressure on other governments.

The Fundamental Rights Agency (FRA) has also become a pivotal actor, particularly through its large-scale surveys (e.g., EU LGBTI Survey III, 2023; EU LGBTI Survey II, 2019) that, unlike other mechanisms from the EU, provide empirical evidence on lived realities. These data-driven approaches help institutional actors identify priority areas, measure implementation gaps, and counterclaims that LGBT+ protections are “elitist” or disconnected from citizens’ needs.

However, Ayoub (2014) still warns of the limits of data and resolution politics. Without mechanisms of enforcement or incentives for compliance, institutional strategies risk being

¹European Parliament resolution of 11 March 2021 on the declaration of the EU as an LGBTIQ Freedom Zone (2021/2557(RSP)). (2021/C 474/15)

https://www.europarl.europa.eu/doceo/document/TA-9-2021-0089_EN.html

captured by symbolic governance, serving identity construction more than material protection. The tension between normative ambition and institutional capacity remains a central paradox in EU LGBT+ rights policy.

2.2.5 Toward an Institutional Identity, Amid Persistent Contradictions

As seen throughout this section by exploring the main EU institutions' agendas, the EU's institutional strategies on LGBT+ rights have evolved from fragmented initiatives to structured frameworks, informed by legal developments, activist pressure, and geopolitical challenges. The 2015–2019 List of Actions laid the groundwork for administrative coordination, while the 2020–2025 Strategy marks a political shift, embedding LGBT+ equality into the EU's narrative of democratic resilience and rule of law.

However, these strategies remain constrained by uneven member state cooperation, limited competences in key areas, and the risk of backlash when LGBT+ rights are instrumentalized in identity politics. As Thiel (2021) and Sloomaeckers (2020) both suggest, the EU's efforts to define itself as a liberal rights community through LGBT+ promotion may strengthen its internal identity; but also expose its normative inconsistencies and geopolitical vulnerabilities.

The next section will turn to precisely how these contradictions have manifested in the last decades, examining how internal backlash in Poland, Hungary, and Bulgaria challenges the EU's ability to enforce its values and what this means for the Union's future as a credible promoter of LGBT+ equality.

2.3. Contemporary Challenges and Backlash in CEE Countries

2.3.1 Introduction: Backlash as a Counter-Narrative to EU Normativity

Over the past decade, the European Union's internal cohesion regarding LGBT+ rights has come under severe strain, particularly in CEE. The initial assumption during EU enlargement, which was that accession would generate convergence on liberal-democratic values including LGBT+ rights has not been held (Kochenov, 2006). Instead, the region has emerged as the epicenter of a growing anti-gender and anti-LGBT backlash, with governments leveraging cultural conservatism, nationalism, and Euroscepticism to justify regressive measures (Thiel 2021).

As documented in ILGA-Europe's recent reports (2019–2025), countries like Hungary, Poland, Bulgaria and Slovakia have adopted increasingly aggressive legislative frameworks that restrict LGBT+ expression, visibility, and rights; often couched in the language of “child protection” and “traditional values.” These developments reflect what scholars identify as the anti-gender agenda: a transnational, ideologically coherent movement opposing gender equality and sexual diversity under the guise of preserving national identity and sovereignty (Kuhar & Paternotte, 2017).

These backlashes are not isolated. Rather, they reflect a systematic challenge to EU liberal-democratic norms and present a normative paradox for the EU: the tension between promoting fundamental rights and respecting national sovereignty. As Weber (2016) notes, in most cases the visible highlighting of LGBT+ rights can erode the internalization and diffusion of such norms, since opposers in the case of the EU as a promoter will easily link it to a threat to their country’s sovereignty. This section examines key developments in Poland, Hungary, and Bulgaria to illustrate the nature, scope, and implications of this backlash.

2.3.2 Poland: “LGBT-Free Zones” and Performative Sovereignty

2019 marked an inflection point with Poland becoming a country that institutionalized homophobia within the EU. Over 100 municipalities, covering approximately one-third of the country, passed resolutions declaring themselves “LGBT ideology-free zones” (Ploszka, 2023). Though not legally enforceable, these declarations carried real symbolic and material consequences: they signaled exclusion, legitimized violence, and undermined EU fundamental rights (Stenberg & O'Dwyer, 2024).

The Polish government, particularly under the Law and Justice Party, has actively weaponized LGBT+ identities as part of its broader culture war against “Western liberalism” since its arrival to power in 2015 (Graff & Korolczuk, 2022). This has involved not only local declarations but also the promotion of anti-LGBT+ rhetoric in national media, the demonization of activists, and the intimidation of Pride participants (da Costa Santos, 2025).

As Thiel (2021) and Sloomaeckers (2020) argue, this form of symbolic resistance is not just domestic politics, it is a performative assertion of national sovereignty against perceived EU hegemony. The Polish government casts the EU’s normative agenda on LGBT+ equality as

cultural imperialism, contrasting it with “traditional Polish values.” In this way, anti-LGBT+ politics become a means of enacting resistance to EU authority.

The EU responded through both legal and symbolic channels. In 2021, the Commission launched infringement procedures against Poland, arguing that the “LGBT-free zones” violate EU anti-discrimination law and the Charter of Fundamental Rights. Several municipalities subsequently withdrew their declarations after threats to EU funding (Øverhaug, 2023). However, as ILGA-Europe notes when questioning the EP resolution on whether the EU is an LGBT+ Freedom Zone, such actions are often performative, and such measures are easily reversible, indicating that the root causes of hostility remain unaddressed (Muñoz Padros, 2021).

Poland thus illustrates the limits of EU enforcement and the persistence of “contested Europeanization” (Slootmaeckers, 2020), wherein member states selectively adopt or reject EU norms based on domestic political incentives. The EU's identity as a normative power is weakened when member states can violate fundamental rights with relative impunity.

2.3.3 Hungary: From Anti-LGBT+ “Protection” Laws to the Criminalization of Pride

Hungary has recently taken the anti-LGBT+ backlash to its most repressive and institutionalized form within the EU. In June 2021, the Hungarian Parliament passed a “child protection” law banning the “promotion” of homosexuality and gender reassignment to minors (Gärtner, 2025). In reality, this law has served as a pretext for sweeping censorship of LGBT+ content in education, media, and advertising. As ILGA-Europe (2021), Amnesty International (2021), and the Venice Commission (2021) all emphasize, this law directly contravenes EU law, the European Convention on Human Rights (ECHR), and international human rights standards.

However, the escalation continued in 2025. As reported by ILGA-Europe (Gärtner, 2025), the Hungarian Parliament has now banned Pride marches nationwide, criminalizing both organizers and participants. The new legislation further authorizes the use of facial recognition technology to identify and punish attendees which is a measure widely condemned as a serious breach of privacy, freedom of assembly, and freedom of expression.

This move marks a fundamental shift in Hungary’s approach: from restricting LGBT+ expression to criminalizing public presence altogether by using the queer community as a scapegoat. According to ILGA-Europe’s Executive Director, Chaber, “This new law is more than just a ban on a single event. It represents an assault on the fundamental freedoms of expression, assembly, and protest, and an attempt to silence the LGBTI community in Hungary.”

The timing and method of the law’s passage (fast-tracked through Parliament without consultation or debate) highlight its political function. As anti-gender literature suggests, such laws are rarely about children’s welfare (Slootmaeckers, 2020). Rather, they are ideological tools used to construct “internal enemies” and consolidate authoritarian governance under the banner of “protecting national values.”

Despite international condemnation, including by the European Parliament and the Commission, Hungary continues to position itself as the defender of “European Christian civilization” against what Viktor Orbán calls “gender madness” (Associated Press in Budapest, 2025). The government’s refusal to comply with EU legal standards, combined with its capacity to exploit the limits of EU enforcement, signals a broader crisis of conditionality and normative authority within the Union.

2.3.4 Bulgaria: A New Frontline of the Anti-Gender Movement

As of 2024, Bulgaria became the latest CEE state to institutionalize anti-LGBT+ repression, passing a sweeping “anti-LGBT propaganda” law that bans the “promotion” of non-heterosexual orientations or non-binary gender identities in schools and in the vicinity of educational institutions. As ILGA-Europe (2024) reports, the bill was initiated by the pro-Russian, far-right Revival Party and fast-tracked through Parliament just days before the summer recess, bypassing scrutiny, stakeholder consultation, and EU compliance mechanisms. The language and scope of the law closely mirror Russia’s 2012 “gay propaganda” law and Hungary’s 2021 “child protection” legislation. The Bulgarian law prohibits “any direct or indirect promotion” of LGBT+ identities, effectively criminalizing inclusive education, access to mental health resources, and symbolic visibility in public institutions.

Bulgaria's legislative turn is not an isolated development. As LGBT-rights NGO Reclaim has reported, far-right parties in the country are advancing two additional anti-LGBTIQ proposals (Goodwin, 2024); the first would ban the display of LGBTQI+ content in public spaces accessible to children and criminalize medical professionals who provide gender-affirming care to trans teenagers. The second aims to amend the Personal Documents Act to prohibit legal gender recognition. This move seeks to codify a regressive 2023 ruling by Bulgaria's Supreme Court of Cassation, which found that existing law does not allow courts to modify the sex, name, or personal ID number of transgender individuals (Yesudas & Ghoshal, 2025).

These developments reflect what Scheppele (2018) called "autocratic legalism": the strategic use of legal institutions to undermine democratic and human rights protections while maintaining a veneer of legality. In this case, far-right forces deploy legal tools not only to roll back LGBT+ rights but also to instrumentalize moral panic for electoral gain, deflecting attention from broader governance failures and corruption (de Costa Santos, 2025).

The Bulgarian case illustrates the EU's deepening normative dilemma: its liberal-democratic identity is eroded when member states are able to pass laws that fundamentally contravene EU values and human rights frameworks with few consequences. As shown by the limited impact of the CJEU's challenge against Hungary's similar law (Bator-Bryla, 2024), the EU's response mechanisms remain slow and politically constrained which in return highlights the lack of more robust enforcement tools to defend LGBTIQ rights and the rule of law across all member states.

2.3.5 A Regional Trend or a European Challenge? The Anti-Gender Agenda as Soft Authoritarianism

The legislative backlashes in Poland, Hungary, and Bulgaria are not anomalies but part of a broader ideological and political realignment taking place across Central and Eastern Europe. However, this normative dissonance is not confined to the CEE region. I argue that, especially seeing the recent global developments ranging from the last 5 years as seen in the previous cases, it reflects a continent-wide (and even global-wide) phenomenon, where both older and newer EU member states are witnessing a resurgence of anti-LGBTIQ sentiment, often framed as a defense of national sovereignty and traditional values. In the next section, examples from Italy and Croatia will be examined to illustrate how this dynamic is also present in Western and Southern Europe, revealing that resistance to EU norms on equality

and inclusion transcends the East-West divide. What unites these diverse national contexts is an effort to reclaim state control over moral and cultural boundaries, often through ethno-nationalist and heteronormative frameworks of citizenship (Kuhar & Paternotte, 2017). The cases of Poland, Hungary, and Bulgaria demonstrate how member state governments can strategically resist EU pressure, erode fundamental rights, and yet remain embedded within the Union's institutional structures, thereby exposing the limitations of the EU's normative power.

2.4. Contesting Normative Unity from both the Core and Periphery

Italy and Croatia, while differing a lot in their accession histories, political cultures, and geographical positions within the EU, offer crucial insights into how the promotion and protection of LGBT+ rights are contested both from within long-established member states and newly acceded ones. Italy, a founding EU member, has increasingly become a site of anti-gender rhetoric and inaction under a far-right populist government (Prearo, 2024). Croatia, conversely, illustrates the limits of EU conditionality, showing how compliance with LGBT+ rights norms can be reversed after accession, especially when such norms are treated as externally imposed rather than internally legitimated (Thiel, 2021).

This section contrasts these two cases to underscore how normative dissonance is no longer confined to new or older members but is becoming systemic. Italy and Croatia thus represent two ends of a continuum of backsliding in LGBT+ rights promotion, rooted respectively in ideological populism and strategic compliance.

2.4.1 Italy: A Founding Member in Regressive Motion

Italy's trajectory in recent years reveals that EU membership alone is not a guarantee of progressiveness or rights protection. While Italy has long struggled with gaps in LGBT+ legal protections, the election of Giorgia Meloni and her far-right Fratelli d'Italia party has amplified anti-LGBT+ rhetoric (Indelicato & Magalhães Lopes 2024) and coincided with a sharp increase in LGBT-phobic violence (FRA, 2023).

According to ILGA-Europe's 2025 statement and annual Rainbow Map, Italy continues to lack key legal protections, including comprehensive hate crime and hate speech laws that explicitly include sexual orientation, gender identity, and expression. These legislative

omissions become critical in the current context, where societal violence against LGBT+ individuals is on the rise.

Meloni and her allies have repeatedly employed anti-gender and anti-LGBT+ rhetoric, accusing progressive movements of spreading “gender ideology” and undermining traditional family values. This narrative mirrors once more the homonationalist and anti-gender discourse traced by Kuhar and Paternotte (2017) across Europe, where “gender ideology” is constructed as a foreign threat to national identity and sovereignty. In Italy, this discourse has been institutionalized through both inaction and active resistance to reform.

A key example is the defeat of the “Zan law” in 2021 (Montecchio, 2024). Proposed by MP Alessandro Zan, the law would have expanded hate crime protections to include violence motivated by homophobia, transphobia, misogyny, and ableism. Despite widespread public support and massive mobilization from civil society, the bill was blocked in the Senate, with Meloni’s party celebrating its downfall. The rejection of the Zan bill revealed not only the lack of political will to protect vulnerable minorities but also a broader effort to invalidate LGBT+ struggles as illegitimate or divisive.

ILGA-Europe’s recent statement following the 2025 hate crimes on queer individuals in Italy explicitly calls on the Italian government to stop “feeding a growing divide in Italian society.” It stresses that current political rhetoric and legislative neglect embolden perpetrators of violence and normalize exclusion. This reflects what Velasco (2021) calls the “symbolic boundary-making” function of anti-LGBT+ rhetoric, where political leaders use LGBT+ issues to demarcate the moral community and signal resistance to external, in this case, the EU, normative pressures.

Importantly, Italy’s case disrupts the assumption that backsliding is confined to newer or eastern EU members. Italy, as a core founding member, shows that illiberalism and anti-gender politics are now entrenched in the European mainstream, posing a direct challenge to the EU’s self-image as a space of progressive rights (Thiel, 2021). Moreover, Italy’s failure to legislate protections or even publicly condemn violence against LGBT+ people raises questions about the effectiveness of EU mechanisms when non-compliance originates in its political center.

2.4.2 Croatia: Conditionality’s Limits and Post-Accession Regression

Croatia joined the European Union in 2013, after a protracted and politically contentious accession process that began in 2005. Overall, Croatia's journey into the EU was marked by externally driven compliance with EU norms (Lorca Arce, 2022), including those related to anti-discrimination and LGBT+ rights (Thiel, 2021). These norms were embedded within the Copenhagen Criteria, which demand respect for minority rights, and further reinforced through accession conditionality; where candidate states are expected to adopt EU-compatible legislation as a precondition for membership.

Indeed, Croatia made several symbolic and legislative moves during its accession period, such as hosting Zagreb Pride with government support, adopting anti-discrimination laws, and issuing progressive statements about LGBT+ inclusion (Vuletic, 2013). However, this compliance was oftentimes strategic and superficial, aimed more at satisfying the EU than reshaping domestic norms (Butterfield, 2016).

This gap between formal adoption and societal acceptance became visible almost immediately after accession. In November 2013, just four months after joining the EU, Croatia held a national referendum to define marriage as exclusively between a man and a woman. Backed by the Catholic Church and conservative NGOs, the referendum passed with two-thirds support (Glaurdić & Vuković, 2016). While legally redundant given the existence of civil unions, the vote was symbolically powerful: it revealed a deep societal resistance to the liberal values presumed to have been internalized during the accession process. This disjuncture illustrates what Thiel (2021) labels as “Potemkin adoption”: a performative compliance wherein candidate states adopt EU norms superficially to satisfy formal accession requirements, while lacking genuine societal or political commitment to those values. These dynamics expose the limits of legal harmonization without societal transformation, highlighting the fragility of the EU's rights conditionality when divorced from deeper cultural legitimacy.

This step back took other forms within Croatian institutions. Successive Croatian governments have adopted a low-profile approach to LGBT+ issues, avoiding public debates and failing to implement meaningful educational or awareness campaigns. While Croatia still ranks relatively well on the ILGA-Europe Rainbow Map (2024)² compared to other Balkan countries, its progress has plateaued. Anti-LGBT+ attitudes remain widespread, and trans rights, in particular, have seen limited institutional support.

² ILGA-Europe Rainbow Map: <https://rainbowmap.ilga-europe.org/>

The Croatian case exemplifies what could be coined as a "post-conditionality gap," a term that would describe the erosion or stalling of norm implementation after the leverage of EU accession disappears, what author Pridham documented through the compliance of accession criteria after the actual accession of Slovakia in the EU and the end of the EU monitoring it (2008). Once a country becomes a full EU member, the EU loses much of its capacity to exert pressure, allowing governments to disengage from rights promotion without significant legal or political consequences. This phenomenon has been observed in Croatia, where the initial momentum for reform during the accession process waned post-membership, leading to challenges in sustaining the implementation of EU norms (Butterfield, 2016).

Furthermore, Croatia's experience underscores the EU's shortcomings in engaging civil society actors as long-term partners in norm internalization. While Brussels focused on legislative benchmarks and institutional capacity during the accession process, it underestimated the importance of societal buy-in and political education. Consequently, LGBT+ rights were often perceived as "EU-imposed values" rather than organic components of democratic citizenship. This disconnect has been attributed to the EU's emphasis on formal compliance over fostering genuine domestic support for reforms (Čemažar & Mikulin, 2017).

The lesson from Croatia is clear: conditionality without sustained post-accession support and accountability mechanisms results in fragile and reversible reforms. The EU's credibility as a normative actor depends not only on its pre-accession demands but also on ensuring continuity and implementation afterward. Scholars have argued that the EU's influence on long-term qualitative changes is limited, emphasizing the need for ongoing engagement with civil society and domestic actors to solidify reforms (ERA, 2015).

2.4.3 Diverging Trajectories, Converging Crises

While Italy and Croatia differ in many respects, the former a Western founding state, and the latter a recent Eastern entrant, both countries illuminate the fragile foundations of LGBT+ rights in the EU. Italy shows how illiberal populism can emerge from the EU's very core, undermining rights through rhetorical normalization of hate and legislative stagnation. Croatia reveals how instrumental compliance under accession conditionality can produce superficial change, vulnerable to immediate reversal once external pressure wanes.

In both cases, EU institutions have proven ineffective at preventing or reversing backsliding. Italy has faced virtually no political or legal consequences for its failure to adopt hate crime protections or address rising violence (De Groot & Beatrix, 2025). In Croatia, the EU has taken a hands-off approach since accession, treating membership as the endpoint of democratization rather than a milestone in a longer process of rights consolidation (Maldini, 2016).

Moreover, both cases show how anti-gender rhetoric has become a flexible political tool: in Italy, it is used to consolidate nationalist-populist support by invoking the “threat” of progressive values; in Croatia, it was deployed post-accession to reaffirm national identity against perceived EU encroachment (Lavizzari & Siročić, 2023). This underscores the anti-gender agenda’s adaptive capacity across political and cultural contexts, making it a potent force in the ongoing contestation of EU normativity.

The cases of Italy and Croatia complicate the narrative of a unidirectional, ever-progressing EU integration of LGBT+ rights. Instead, they show that norm contestation is pervasive and multidimensional, driven by both internal ideological shifts and the structural weaknesses of EU enforcement mechanisms (Thiel, 2021). Whether through populist rhetoric in Western Europe or post-conditionality drift in the East, LGBT+ rights remain highly vulnerable to politicization and reversal.

These dynamics call for a recalibration of the EU’s strategy. Legal conditionality, while useful, must be supplemented by deeper engagement with local civil society, continuous monitoring, and political accountability mechanisms that extend beyond accession. The EU’s commitment to LGBT+ rights cannot be reduced to technical compliance; it must be lived, defended, and continuously reaffirmed, especially in the face of growing authoritarianism and anti-gender mobilization.

Italy and Croatia are not outliers but harbingers. As the anti-gender movement becomes increasingly mainstream, the EU must reckon with the uncomfortable truth that its own cohesion is at stake in the fight for LGBT+ equality

2.5. Conclusion: Crisis and Continuity in EU LGBT+ Rights Promotion

This chapter has traced the historical, institutional, and discursive evolution of LGBT+ rights promotion in the EU, revealing a complex terrain marked by ambition, contradiction, and contestation. From the early incorporation of non-discrimination into EU treaties, to the use of LGBT+ rights in enlargement conditionality, to recent backlashes in Hungary, Bulgaria, Croatia, and Italy, it is evident that the promotion of LGBT+ rights is neither linear nor guaranteed.

The EU has constructed itself as a normative power through the articulation of rights-based discourses, but its internal disparities have exposed the fragility of this identity. Illiberal turns in founding and new member states alike challenge the assumption that Europe is inherently progressive. At the same time, anti-gender mobilizations reveal a pan-European, networked resistance that demands not just legal but ideological responses.

The EU's mechanisms of conditionality and norm promotion are under strain. Conditionality appears increasingly hollow when it fails to ensure sustainable change or uphold rights post-accession. This not only exposes institutional weaknesses but also emboldens populist actors to portray the EU as hypocritical or intrusive. As we will see in the next chapter, this creates an even worse effect when dealing with the promotion of LGBT+ rights as a baluard of its foreign policy.

Emerging critiques from queer theory and postcolonial scholarship deepen these concerns and help us understand better the on-going dynamics within the Union. They call attention to how the EU's rights discourse can entrench new forms of exclusion, particularly when "progress" is measured through compliance with liberal, Western-centric models. These critiques do not dismiss the importance of rights, but challenge the EU to develop more reflexive, context-sensitive approaches that empower rather than prescribe.

However, a full interrogation of these critiques, alongside a detailed exploration of norm promotion and resistance in other contexts, requires a closer look at how LGBT+ rights operate as both policy tools and symbolic battlegrounds in EU external action. The next chapter turns to this task by examining case studies beyond the EU's core, tracing how conditionality, power, and identity politics play out in candidate and neighboring states.

What remains as a lesson from this chapter is that, ultimately, the fight for LGBT+ rights in Europe is not just about laws, it is about the soul of the Union itself. It asks whether the EU can move beyond performative liberalism to become a genuinely inclusive and resilient

polity. As crises proliferate and norms are challenged, the question remains: can the EU defend its values without reproducing the very exclusions it claims to resist?

Chapter 3: Queering the Neighbourhood and Beyond: EU Accession, Enlargement & Foreign Policy

3.1. Introduction

As seen in Chapter 1 and 2, over the past two decades, the European Union has positioned itself as a promoter of LGBT+ rights, integrating equality and anti-discrimination norms into its internal and external relations frameworks. Even though we have previously focused on the internal mechanisms through which this promotion has been enacted, the EU has also actively embedded LGBT+ rights into its foreign policy, particularly through the use of conditionality in its Association Agreements and its post-2020 partnership frameworks such as the Post-Cotonou Agreement. In this context, human rights conditionality refers to the practice of linking political or economic cooperation, such as trade agreements, development aid, or accession processes, to a partner country's adherence to human rights and democratic norms (Donno & Neureiter, 2018). For the EU, this means requiring alignment with core values, as a prerequisite for receiving benefits or concluding agreements. EU foreign policy more broadly encompasses the collective external actions and diplomatic strategies pursued by member states, coordinated largely through the Common Foreign and Security Policy (CFSP), with the goal of advancing peace, security, democracy, and shared European values on the global stage (Bindi, 2022). This policy framework is operationalized through key institutions such as the European External Action Service (EEAS) and guided by the High Representative for Foreign Affairs and Security Policy (Vanhoonacker & Pomorska, 2013), though its effectiveness is often constrained by divergent national interests that challenge internal coherence and unity (Keukeleire & Delreux, 2022). In this way, the EU has further operationalized SOGIESC rights and diversity as litmus tests for democratic values and “Europeanness.” Yet, as it also happened within the EU, the diffusion of these norms beyond its borders has provoked a complex set of responses: ranging from adaptation and strategic compliance, to resistance, contestation, and politicized backlash, even more starkly due to the imperialist and postcolonial contexts that these relationships are built on.

This chapter explores how the EU’s external actions, enlargement politics, and foreign policy frameworks have influenced LGBT+ rights debates and activism in both its direct neighbourhood (the cases of Ukraine, Georgia and Russia will be explored in detail) and in periphery contexts, specially in the West-East African regions, with the cases of Ghana and

Uganda. These regions are of special interest since they have been receiving and increasing attention on their positions and policies regarding LGBT+ rights, both by their governments and by European institutions (Asante et al., 2024; Van Oorschot, 2020; Buyantueva, 2018; Thapa, 2015). While the regions mentioned are disparate in their geopolitical ties to the EU, they are all subject to its normative power, either through formal instruments of conditionality or through informal discursive and symbolic influence. In both cases, the EU's promotion of LGBT+ rights is entangled with broader geopolitical dynamics including its rivalry with Russia to influence the Eastern Partnership (EaP) countries (Armenia, Azerbaijan, Belarus, Georgia, Moldova, and Ukraine) and its perceived neocolonial role in parts of the Global South in the case of Uganda and Ghana, with their vital roles on the building of the Post-Cotonou Agreement with the EU.

As it will be proved throughout this chapter thanks to the case studies, non-western LGBT+ visibility and advocacy most times go beyond the debate of human rights and become geopolitically entangled with performances of belonging. Especially in the European neighbourhood, Pride marches and anti-discrimination reforms are framed by both supporters and opponents as markers of alignment with “Europe” or, conversely, as capitulations to Western cultural imperialism. This politicization creates a very stark process of binarization by which projected EU norms can reproduce temporal and spatial hierarchies, which in turn cast post-socialist and non-Western European societies as lagging, incomplete, or “backward” in relation to an idealized Western modernity (Ayoub & Paternotte 2014).

Meanwhile, in peripheralized countries such as those in the African, Caribbean, and Pacific (ACP) group the EU's human rights agenda has clashed in the past couple decades with deeply rooted religious, nationalist, and postcolonial sensitivities. In the case studies of Ghana and Uganda, it will be seen how recent anti-LGBT+ laws have been accompanied by rhetoric that explicitly rejects European influence and portrays queer rights as foreign impositions, often drawing on anti-Western sentiment and bolstered by local and international conservative movements. These trends signal a growing challenge to the EU's normative ambitions in its broader foreign policy and development cooperation efforts.

This chapter also examines how these global dynamics reverberate back into the EU itself and its former colonial powers. In the UK and the US, for instance, the rise of anti-“gender ideology” discourse and the export of reactionary politics by transnational conservative actors complicate the image of the West as a monolithic queer-friendly space. The transnational

circulation of both progressive and regressive discourses will illustrate that norm diffusion is neither linear nor unidirectional. It also highlights the limitations of a top-down approach to LGBT+ rights promotion, which may reinforce resistance, marginalize local actors, or produce visibility without safety.

The chapter proceeds in five parts. The next section reviews the EU's evolving approach to LGBT+ rights in its foreign policy, including its use of conditionality in accession and association processes. This is followed by a comparative analysis of case studies in the EU's neighbourhoods (Ukraine, Georgia and Russia) which illustrate the complex and often contested terrain of LGBT+ norm reception and visibility politics in post-Soviet spaces. The third section shifts focus to Ghana and Uganda, exploring the backlash against EU rights promotion in the context of the Post-Cotonou Agreement and broader anti-Western sentiment. In both neighborhood and periphery contexts, the chapter analyzes how LGBT+ rights are situated within geopolitical imaginaries of modernity, sovereignty, and civilization.

The fourth section critically assesses the EU's policy instruments and strategies, questioning the efficacy and unintended consequences of its human rights conditionality frameworks through a queer theory lense. It asks whether the EU's external action is equipped to handle the complex entanglements of queerness, nationalism, and postcoloniality in non-European contexts. Finally, the final section turns to further analyze how the anti-gender movement has been on the rise in western contexts and how it further reverbrates and weakens the role of the EU as an LGBT+ rights promoter. This chapter will give us the last information needed in order to continue with the last chapter of the thesis that will try to add recommendations on how to improve the present state of the EU role as a rights promoter.

3.2. The EU's Conditionality and Its Discontents: LGBTI Norms and the Politics of Sovereignty at the Margins

At the dawn of the 21st century, the European Union embraced a transformative vision of its surrounding regions, conceptualizing them as part of a "wider Europe" and potential sites for exporting its liberal-democratic ideals (Krastev & Holmes, 2019). This approach was fueled by optimism surrounding the post-Cold War democratization of Eastern Europe, and presumed a linear, inevitable convergence towards Western norms, including those related to LGBTI rights.

This aspirational model became institutionalized through key instruments of enlargement policy, most notably the Copenhagen Criteria, which were introduced in 1993 and are a guide of checklists and principles that tie accession of non-EU countries to adherence to democratic standards and the protection of minority and human rights (Dudley, 2020). The EU positioned itself as the arbiter of these values, asserting a form of normative authority that directly engaged (and at times, disrupted) traditional state sovereignty. As Ammaturo (2015) argues, the EU's criteria for engagement has gone beyond to the so-called 'pink agenda' reframing sovereignty through a sexual rights lens and constructing a homonational, transnational citizenship model that is simultaneously inclusive and exclusionary: offering legitimacy to those conforming to liberal sexual norms as understood by the EU, while marginalizing those who do not.

3.2.1 Enlargement Conditionality: Progress, Performance, and Pushback

Among the EU's external policy tools, enlargement conditionality has been the most impactful in shaping domestic reforms. In candidate countries such as Albania, Serbia, Montenegro, and North Macedonia in the Western Balkans, progress toward membership has been linked to legislative changes aligned with EU human rights standards (Zhang, 2024). These reforms are assessed through mechanisms such as the Stabilization and Association Agreements, with civil society organizations (CSOs) like ILGA-Europe, in the case of LGBT+ rights, contributing with data and recommendations to EU progress reports (Stivachtis, 2021).

Yet, this process often incentivizes superficial or strategic compliance, rather than genuine societal transformation. As Slootmaeckers and colleagues (2016) note, the adoption of LGBTI-inclusive laws frequently serves symbolic rather than substantive purposes, allowing both the EU and candidate states to claim success while deeper social norms remain unchanged. In North Macedonia, for instance, anti-discrimination legislation was passed quickly to meet EU requirements, but later annulled due to procedural irregularities, only to be re-enacted under heightened political contention (Marusic, 2020).

As mentioned in Chapter 2, this pattern of formal but fragile alignment to LGBT+ rights leads to "Potemkin" style policies: policies that are designed to satisfy external scrutiny while concealing persistent domestic resistance. Croatia offered a clear example: although EU conditionality helped catalyze a wave of legal reforms, these changes provoked significant

grassroots backlash. Conservative actors, such as the group *In the Name of the Family*, successfully mobilized public opposition and forced a referendum to constitutionally define marriage as heterosexual (Butterfield, 2016). In Kosovo, as Rexhepi (2016) argues, the EU instrumentalized LGBTI rights not to empower queer individuals, but to reinforce its own identity as a modern, secular polity in contrast to what it portrayed as the backwardness of Muslim-majority societies, even in the European continent. This practice, what Rexhepi terms “EU-washing”, echoes colonial discourses and risks reproducing orientalist logics under the guise of human rights advocacy.

Even where accession pressures have led to rights adoption, the durability of reforms is far from guaranteed. Once candidate states formally join the EU, the momentum for democratic and rights-based reforms often stalls or reverses. Sadie (2024) links this democratic backsliding to multiple factors: the absence of deeply internalized liberal norms, the rise of populist movements, socio-economic dissatisfaction, and the influence of geopolitical rivals like, for example, Russia. In fact, Russia has actively sought to shape regional attitudes by sponsoring anti-LGBTI campaigns, including through initiatives like the *World Congress of Families*, co-funded by conservative networks from both Russia and the United States (Bonny, 2019).

3.2.2 Civil Society, Resistance, and the Double-Edged Nature of Visibility

As part of its rights promotion strategy, the EU increasingly turned to civil society engagement in the 2000s, aiming to foster bottom-up democratization and create local ownership of rights discourses through policies and tools such as the European Instrument for Democracy and Human Rights (EIDHR) or the European Neighbourhood Plan (ENP) with its financial schemes as direct support (Stroetges, 2013; European Commission, 2006). However, it is important to note that in many post-communist and post-colonial contexts, civil society remains underdeveloped and heavily reliant on external donors (O’Dwyer, 2018). This dependency not only exposes local CSOs to accusations of foreign interference, but also makes them targets of state repression.

In authoritarian and semi-authoritarian environments like Egypt or Azerbaijan, governments have responded to this external support by tightening regulations on CSO registration and foreign funding, effectively limiting their operational space (ILGA World, 2020). Simultaneously, some CEE governments have fostered “GONGOs”, which are

government-organized NGOs, or allied with religious institutions to actively counter LGBTI advocacy efforts (Pousadela & Pereira, 2021). Thus, in general LGBTI rights have become more politically present and discussed, but in turn, they have also become more contested.

This dynamic contributes to a potent fusion of homophobia and EU-phobia outside of the Union, as conservative forces frame EU-promoted LGBTI rights as an assault on national culture and sovereignty. These narratives often draw upon broader moral panics, particularly in the post-9/11 era, where Islamophobia and homophobia are interwoven into a defensive nationalism. Mole (2016) describes how these intersecting anxieties portray SOGIESC minorities, reinforcing them as threats to national security and moral order, with queer bodies becoming securitized as a menace, while the state is increasingly being portrayed as vulnerable to external dominations and attacks.

3.2.3 The Neighborhood Policy and the Limits of Influence

In regions where EU accession is not on the table, such as countries in the Southern Mediterranean or some Eastern Partnership countries, the ENP offers an alternative form of engagement. Initiated in 2004, the ENP aims to provide enhanced aid and cooperation in exchange for commitments to democratic principles and human rights. Yet without the incentive of EU membership, the EU's ability to drive reforms on issues that are considered sensitive in the region, like LGBT+ rights, is markedly weaker (Thiel, 2021).

Despite partial gains, progress remains inconsistent. ENP conditionality has faltered due to competing geopolitical and ethno-religious pressures. States like Morocco and Turkey receive significant EU funding, but human rights conditionality is inconsistently applied. As Bentzen and Przetacznik (2020) note, the prioritization of migration management and regional stability often supersedes commitments to gender or sexual minority rights in the continent.

The EU's diplomatic service, the EEAS, has attempted to mainstream LGBTI rights through the consistent developments of guidelines for foreign engagement that have addressed this topic (Mayrhofer, 2018). Yet in practice, diplomatic measures often fall short of influencing structural change, especially in countries marked by domestic instability or competing ideological influences that are quite opposite to the promotion of LGBT+ human rights (Janoff, 2021). Russia, for instance, has aptly countered EU influence by deploying

anti-LGBTI rhetoric via religious networks, media, and civil society proxies (The Economist, 2015).

3.2.4 Queering Sovereignty and the Boundaries of Europe

At the heart of these dynamics lies a broader contestation over the meaning of sovereignty in an age of normative globalization. The EU's efforts to promote LGBTI rights challenge traditional Westphalian models by embedding liberal norms into the fabric of international cooperation. Yet, as Ammaturo (2015) argues, this queering of sovereignty also produces an exclusionary form of European belonging, one in which only those states that embrace the EU's values are granted full legitimacy.

For peripheral or postcolonial societies, this creates a double bind. On the one hand, embracing LGBTI rights may facilitate political or economic integration with the EU. On the other, doing so may trigger domestic backlash or reinforce perceptions of cultural subordination. The EU's rights promotion strategy thus risks operating as a new form of neocolonial governance, advancing liberal norms through top-down mechanisms while failing to engage with the lived complexities and needs of marginalized communities on the ground.

3.3 Queer Norms and Geopolitical Frictions: EU LGBT+ Advocacy in the Eastern Partnership and Post-Cotonou Spaces

This section examines how LGBT+ rights, as promoted through EU enlargement and foreign policy, are received, adapted, resisted, or transformed in two diverse regional political and cultural contexts: Eastern Partnership Countries (Ukraine and Georgia) that receive a very strong influence from neighbour Russia, and the Post-Cotonou Agreement countries of Ghana and Uganda. While Ukraine represents a clear example of embraced aspects of EU-oriented LGBT+ normativity to varying degrees, Georgia and Russia illustrate forms of normative backlash that challenge the EU's moral authority. Ghana and Uganda, meanwhile, demonstrate how queer rights discourses in EU foreign policy reverberate in postcolonial settings, often triggering intensified repression rather than liberalization.

Over the past two decades, the politics of LGBTQ rights have become increasingly entangled with global geopolitical shifts, functioning not merely as a domestic rights issue, but as a

proxy battleground for ideological contestations between liberal democratic norms and resurgent authoritarian, nationalist models. Building on theoretical frameworks in queer international relations and securitization theory (Puar, 2007; Sjoberg, 2010; Nuñez-Mietz, 2019), this section unpacks how sexuality, and particularly LGBTQ identities, has come to be framed as both a threat and a symbol of allegiance across the globe.

3.3.1 Eastern Partnership and Gayropa as a “threat”: Ukraine, Georgia & Russia

In the last decades in Russia, LGBT+ identities have been consistently constructed as threats to the state’s moral, demographic, and ideological integrity. Since the 2013 federal law banning “propaganda of non-traditional sexual relations to minors,” the Russian state has progressively escalated its campaign against sexual and gender diversity. These policies are not simply about restricting rights; they constitute a deliberate strategy of securitization and otherization wherein the state identifies LGBT+ people as existential threats to national cohesion (Stakic, 2015; Tsureyan, 2024; Luciani & Shevtsova, 2025). This process intensified with the 2020 constitutional amendment that defined marriage exclusively as a union between a man and a woman and culminated in the 2023 Supreme Court ruling labeling the “international LGBT movement” as extremist (Amnesty International, 2023).

Crucially, this securitization is not only internal. It is embedded in a broader geopolitical narrative in which LGBT+ rights are portrayed as Western impositions designed to undermine Russian sovereignty (Luciani & Shevtsova, 2025). In official rhetoric, including from President Putin and the Russian Orthodox Church, the liberal promotion of LGBTQ rights becomes a tool of Western ideological warfare. The Russian state’s military aggression is thus presented as part of a broader civilizational clash: on one side, the Christian and Slavic world defending its traditions; on the other, the degenerate liberalism of a so-called “Gayropa” (Kratochvíl & O’Sullivan, 2023).

Putin’s 9 May 2022 Victory Day speech, delivered amid the full-scale war in Ukraine, encapsulated this worldview. Declaring that Russia would “never reject our love for Motherland, our faith, and traditional values,” Putin directly tied the military campaign to moral and spiritual defense. Similarly, Patriarch Kirill’s sermon justifying the invasion as a necessary measure to “protect Donbas from Western-sponsored Pride parades” demonstrates how LGBTQ visibility is constructed as a literal threat requiring violent intervention (Luciani & Shevtsova, 2025).

While Russia weaponized sexual politics to consolidate authoritarianism and justify militarism, Ukraine was forced into a reactive and adaptive mode. In the early 2010s, Ukraine showed signs of emulating Russia's anti-LGBT+ trajectory. Between 2011 and 2013, six bills were introduced in the Ukrainian parliament that aimed to prohibit “propaganda of homosexuality and transgenderism” (Soroka et al., 2023). The most developed of these, Draft Law number 0945, explicitly linked LGBT+ visibility to threats of national security. This draft suggested that “propaganda” would provoke HIV epidemics, destroy the family, and lead to demographic collapse. Political parties like Svoboda further mobilized against LGBT+ marches by framing them as vehicles of foreign ideological subversion (TSN, 2012).

However, Ukraine's geopolitical trajectory toward EU integration ultimately reshaped the state's response. European institutions, particularly in the context of visa liberalization and the Association Agreement, pressured Ukraine to align its domestic policies with EU anti-discrimination norms (Luciani & Shevtsova, 2025). This pressure resulted in the passage of an anti-discrimination amendment to the Labour Code in 2015, though it was met with resistance from both political elites and the public. At the time, public support for LGBT+ rights was low: a 2022 report indicated that over 60% of Ukrainians held negative attitudes toward sexual minorities (Nash Svit, 2022). Reform was largely top-down, and compliance with European expectations often appeared symbolic rather than substantive. As one Ukrainian MP, Yuriy Lutsenko, put it, “Better a gay parade on Khreshchatyk than Russian tanks in Kyiv,” reflecting a conditional acceptance of LGBT+ rights in the name of geopolitical survival (Shevtsova, 2020).

The Russian invasion of 2022, however, significantly altered the terrain. The war triggered not only a national consolidation effort but also a reframing of who is considered part of the Ukrainian polity (Luciani & Shevtsova, 2025). LGBTQ individuals serving in the military or volunteering in humanitarian roles began to gain public visibility. Organizations of queer veterans and soldiers formed in response to right-wing calls to conscript gay men instead of allowing them to march for equality. These groups aimed to demonstrate that LGBT+ Ukrainians were equal contributors to national defense and, by extension, deserving of equal rights (Shevtsova, 2018; Martsenyuk & Shevtsova, 2024).

This has contributed to a shift in public opinion: by 2023, the proportion of Ukrainians supporting equal rights for LGBT+ people had doubled from 33% in 2016 to 67% (Nash Svit, 2023). This political moment enabled new initiatives, including a petition to legalize

same-sex partnerships, which received enough public support to trigger formal review by President Zelenskyy (Zamfir, 2023). Moreover, during parliamentary debates on the Istanbul Convention, MPs used arguments about aligning with European values and ensuring international support in the face of Russian aggression, suggesting that LGBT+ rights were no longer merely tolerated for strategic reasons, but increasingly internalized as part of national identity construction (Krizsán & Roggeband, 2021).

Still, the process remains uneven and conditional. The Ukrainian state's willingness to support LGBT+ people is often contingent upon their alignment with normative ideals of heroism and patriotism. LGBT+ veterans and cisgender military personnel are more likely to be valorized than gender-nonconforming or openly activist individuals (Luciani & Shevtsova, 2025). Thus, desecuritization and securitization processes coexist and interact within Ukraine's wartime nation-building.

Georgia represents a third trajectory. While also pursuing EU membership, Georgia has more explicitly flirted with anti-LGBTQ rhetoric as a political tool. Initially, Georgia's pro-Western orientation under the United National Movement (2003–2012) made overt homophobia politically difficult (Rekhviashvili, 2018). Although the Georgian Orthodox Church, closely aligned with the Russian Orthodox Church, voiced strong opposition to LGBT+ rights, the state formally adopted a progressive anti-discrimination law in 2014. Yet enforcement has remained minimal, and LGBT+ visibility in the public sphere has frequently met with violent resistance (Civil Georgia, 2023)

The political landscape shifted dramatically in the aftermath of Russia's war on Ukraine. The Georgian Dream (GD) government has increasingly aligned with nationalist and religious forces. In 2016, Georgia hosted the World Congress of Families, a transnational anti-gender platform linking US evangelicals, Russian conservatives, and local actors like businessman Levan Vasadze (Moss, 2025). Vasadze called on the West to "stop pushing gay marriage in Georgia," despite the fact that neither the EU nor Georgian queer activists had made such a demand (Staff, 2016). The following year, Georgia amended its constitution to define marriage as a union between a man and a woman (Luciani, 2023).

In 2024, GD escalated its strategy by adopting a "Law on Family Values and Protection of Minors," outlawing LGBT+ Pride events, the display of rainbow symbols, and any media that "promotes same-sex or intimate relations." The law also bans gender-affirming procedures

and legal gender recognition (Nikoleishvili, 2024). This initiative, once relegated to fringe religious groups, became central to the government's electoral strategy. Simultaneously, the passage of a controversial "foreign agents" law targeted civil society more broadly, linking liberal NGOs, LGBT+ advocacy, and foreign interference in a single securitized narrative (Luciani & Shevtsova, 2025). By casting themselves as defenders of sovereignty against Western ideological colonization, it can be said that the Georgian government sought to appeal to conservative voters while maintaining a façade of strategic ambiguity toward Europe.

This strategy has been reinforced by Georgia's growing alignment with Hungary's Viktor Orbán, who offers a model of illiberal governance compatible with EU membership. In 2023, Georgian Prime Minister Garibashvili attended the Conservative Political Action Conference in Budapest, warning against LGBT+ "propaganda" and "gender ideology" as tools of population control. This articulation of sovereignty through anti-gender politics illustrates how conservative elites can simultaneously reject liberal norms while remaining within the European political project (Mos, 2023).

Public attitudes in Georgia remain overwhelmingly homophobic, yet surveys show a slight decline in support for curbing LGBT+ rights between 2016 and 2022 (WISG, 2023). As in Ukraine, visibility and repression exist in tension. But unlike Ukraine, Georgia's political leadership has chosen to move toward full securitization, using LGBT+ issues to consolidate authoritarian control rather than redefine the nation's identity in inclusive terms.

Across the Eastern Partnership countries, LGBT+ rights have become deeply embedded in the struggle over sovereignty, identity, and geopolitical orientation, highlighting the importance and the questioning on whether the EU is taking the right approaches to promote LGBT+ rights in the region. In Russia, LGBT+ people are weaponized to construct an external enemy and justify internal repression. In Ukraine, LGBTQ identities are gradually being rearticulated within the national project, but they are becoming both securitized especially when aligned with military sacrifice and desecuritized when they assume its normalcy in trying to align to European values; when LGBT+ rights have not been on the table in Ukrainian politics until recently. In Georgia, LGBTQ visibility is increasingly framed as a foreign threat, with securitizing measures escalating despite formal commitments to EU norms.

These divergent paths demonstrate that securitization is not an inevitable outcome of conflict or conservatism; rather, it is politically contingent, shaped by broader narratives of nationhood, sovereignty, and civilizational alignment. While Russia's homophobia is explicit and state-led, Ukraine and Georgia reflect the ambiguities and contradictions of aspiring to European modernity while navigating internal resistance and external threats.

3.3.2. Ghana and Uganda: Backlash in Post-Cotonou Agreement Countries

The European Union's normative commitment to LGBT+ rights extends beyond its internal policies and the neighbourhood countries and into its external relations with other countries outside of the continent, particularly through instruments such as the Post-Cotonou Agreement, a framework for political and economic cooperation with 79 countries from the ACP group (Oxford Analytica, 2021). While framed around the language of human rights, democracy, and sustainable development, the Agreement also includes implicit and explicit references to protections for sexual and gender minorities. These provisions, however, have ignited severe backlash in certain ACP countries (Uganda and Ghana are clear examples) where political elites, religious leaders, and civil society actors have framed the EU's rights-based approach as a neocolonial imposition on sovereign values as it will be shown in this section.

In Uganda, the trajectory of anti-LGBT+ legislation has been particularly stark. While homosexuality was already criminalized under colonial-era laws, the reintroduction and passage of the Anti-Homosexuality Act (AHA) in 2023 marked an escalation in both severity and symbolic significance. The law introduced penalties including life imprisonment and the death penalty for "aggravated homosexuality" (Human Rights Watch, 2024). EU institutions issued strong condemnations, citing grave violations of international human rights norms. Yet, Ugandan President Yoweri Museveni defended the law as a bulwark against Western moral imperialism (Dicklitch et al., 2012). Citing EU and US pressure, Museveni and his allies invoked anti-colonial rhetoric to justify the repression, portraying queer rights as a Western-imported moral contagion threatening national sovereignty and cultural integrity.

A similar dynamic has unfolded in Ghana, where the proposed Promotion of Proper Human Sexual Rights and Ghanaian Family Values Bill, first introduced in 2021 and received parliamentary approval in 2024, criminalizing not only same-sex acts, but also the promotion of LGBTQ+ rights, support groups, and even expressions of gender non-conformity (The

Guardian, 2024). As in Uganda, the bill has drawn support from conservative Christian coalitions, local politicians, and transnational anti-gender actors who draw upon both religious doctrine and nationalist discourse to construct queerness as incompatible with “authentic” African values, a practice long documented in the last couple decades (Abbas & Ekine, 2013).

This backlash must be situated within broader global trends. Far from representing purely domestic conservatism, the anti-LGBT+ mobilizations in Uganda and Ghana are deeply transnational. US-based evangelical groups such as the Family Research Council and the World Congress of Families have long supported anti-LGBT+ activism in Africa, offering funding, legal advice, and ideological frameworks (Sanders, 2016). Paradoxically, this Western conservative intervention coexists with the rejection of Western liberalism, exposing the complexity of how global ideologies are selectively mobilized. Right-wing populists in Europe have mirrored this rhetoric in recent years, appropriating anti-gender ideology discourses to push back against progressive internationalism (Duffy, 2024). Thus, the backlash in Africa and the reactionary turn in Europe reflect a circular, entangled political ecology of moral conservatism, rather than a binary clash between “progressive Europe” and “backward Africa.”

The EU’s efforts to embed SOGIESC rights within its development aid frameworks, particularly under the Post-Cotonou Agreement, have often been interpreted in African states as manifestations of homocolonialism, a concept defined as “the deployment of LGBTIQ rights and visibility to stigmatize non-Western cultures” (Rahman, 2014, p. 6). As Wahab (2018) notes, postcolonial states perceive sexuality as integral to national sovereignty; thus, the conditionality of aid based on LGBT+ rights protections is often seen as an infringement upon self-determination. When the EU links development tools to migration control or rights performance, as was the case with the controversial 2018 draft of the post-Cotonou agreement, it further exacerbates perceptions of neocolonial leverage and undermines its legitimacy as a normative actor (Cuny, 2018; Euractiv, 2018).

The politics of queer visibility in both Uganda and Ghana reveal a paradox of hypervisibility and institutional erasure. Queer individuals are often made hypervisible in media and political discourse, portrayed as existential threats to national identity. In Uganda, this was exemplified by the infamous 2010 Rolling Stone article that published names and photos of “known homosexuals” under the headline “Hang Them” (Kron, 2011). In Ghana, headlines

routinely stoke panic about “LGBT infiltration,” often conflating advocacy with criminality (Tettey, 2016). At the same time, queer people remain legally invisible: neither country recognizes sexual minorities as a protected class, and both exclude them from constitutional, educational, and public health protections (Asante, 2017; Nabuuma, 2020). This dichotomy of hypervisibility as deviance and invisibility as non-recognition produces a zone of impunity where violence and discrimination flourish.

This weaponization of visibility is embedded in broader postcolonial anxieties. Both Ghana and Uganda inherited anti-sodomy laws from British colonial rule, yet contemporary political and religious leaders now invoke these laws to defend national morality against “foreign influence” (Han & O'Mahoney, 2014). This selective memory allows leaders to frame queerness as un-African, even while relying on colonial legal scaffolding to justify their position. The contradictory figure of the queer subject, simultaneously nonexistent and dangerously visible, forces LGBTQ+ individuals to navigate precarious forms of legibility, often masking their identities while remaining hyper-policed (Svensson et al., 2025).

Resistance has nevertheless persisted, albeit under increasingly constrained conditions. In Uganda, the LGBTQ+ movement has responded to repression with creative and intersectional strategies. Many groups now operate covertly, using encrypted communication, decentralized organizing, and regional coalitions to avoid detection while maintaining community solidarity (Strand & Svensson, 2023). Some adopt postcolonial frameworks of resistance, emphasizing traditional African practices of gender fluidity and relational kinship to reclaim queerness as indigenous rather than imported. These efforts highlight the need for rights strategies that are locally grounded rather than externally imposed. Indeed, Western-funded NGOs have been forced to reassess their approaches, with some shifting toward more culturally sensitive and indirect advocacy under the broader umbrellas of “public health,” “youth engagement,” or “gender equity” (Baguios et al., 2021).

Yet even such strategies remain vulnerable to suspicion. NGOs in Ghana are frequently accused of advancing Western moral agendas, especially when their funding sources are European or American (Asante, 2017; Baral et al., 2023). In Uganda, the criminalization of “promotion” of homosexuality under the 2023 AHA has made most forms of advocacy functionally illegal, forcing service providers underground or out of operation altogether (Human Rights Watch, 2024). These crackdowns not only endanger activists but also

contribute to the broader erosion of civil society, reducing space for dissent and democratic accountability.

The repression of LGBTQ+ rights in Ghana and Uganda cannot be divorced from the broader matrix of gender, nationalism, and heteropatriarchy. As scholars such as Alexander (2013) and Pucherova (2019) argue, postcolonial nationalist projects often reinscribe colonial gender hierarchies, casting the heterosexual male patriarch as the ideal citizen. Within this framework, both women and queer individuals are subordinated to a heteronormative vision of the nation. In Ghana, even feminist movements have often marginalized queer voices, focusing narrowly on cisgender women's rights in ways that exclude or erase lesbian, bisexual, and queer women (Nketiah, 2022). This exclusion reinforces the idea that queerness is incompatible with African culture and poses a threat to respectable womanhood. The "respectable African woman" thus becomes a symbolic imposition against queerness, further entrenching the heteropatriarchal order.

These dynamics of legal repression, moral panic, and cultural nationalism illustrate the risks of imposing universalist rights agendas without sufficient attention to postcolonial contexts. The EU's strategy of conditional aid, while normatively consistent with its self-image, may inadvertently intensify the very repression it seeks to alleviate. If the EU wishes to improve its legitimacy as an external rights promoter, it must reconsider the automatic linking of SOGIESC rights to aid and trade, and instead foster more nuanced, context-sensitive forms of support: ones that recognize the agency of local queer actors and the specific sociohistorical landscapes in which they operate (Thiel, 2021).

Ultimately, the cases of Ghana and Uganda serve as powerful reminders of the double-edged nature of queer visibility. While visibility can be a tool of resistance and recognition, it can also expose queer subjects to heightened scrutiny, violence, and erasure. These contradictory dynamics, shaped by colonial legacies, global moral economies, and nationalist anxieties, demand a rethinking of international LGBTQ+ advocacy. Rather than exporting Western frameworks, solidarity must begin by listening to local voices, understanding complex positionalities, and acknowledging the entangled histories that continue to shape queer life across borders.

3.4. A Queer Theory Critique on EU Foreign Policy Tools and Conditionality

The cases explored in the previous section illustrate not merely localized instances of backlash against the promotion of LGBT+ rights but systemic consequences of the EU's and Western Countries' foreign policy strategies that embed conditionality into development and cooperation. A queer theoretical perspective foregrounds how such strategies (however well-intentioned) often reinforce asymmetrical power structures under the guise of normative progress. At the heart of this critique lies a fundamental question: can the EU's promotion of LGBT+ rights be disentangled from its broader project of global governance, one historically shaped by colonial hierarchies and imperial ambitions?

One of the primary tenets of a decolonial or non-colonial international relationship is voluntary engagement based on parity and mutual respect (Staeger, 2016). Yet, the EU's external action instruments, especially, conditionality, rarely foster such symmetry. When trade deals, diplomatic ties, accession to the European Market or development assistance are conditioned on the adoption of European human rights standards, the result is not a dialogue among equals, but a coercive framework of compliance. As Thiel (2021) argues, such mechanisms often function as tools of normative imposition rather than persuasion, limiting agency among recipient states and feeding perceptions of neocolonial domination.

These dynamics raise critical ethical and political concerns. While the EU presents itself as a global leader in LGBT+ rights, its reliance on conditionality often undermines the legitimacy of this claim. As Wahab (2018) asserts, for many postcolonial states, the regulation of sexuality is intertwined with national sovereignty and cultural self-definition. Thus, the promotion of SOGIESC rights becomes entangled in struggles for postcolonial self-determination, especially in a neoliberal global order where European states still dominate key economic and geopolitical arenas.

From a queer theory lens, these contradictions are once again illuminated through the concept of homonationalism (Puar 2007; 2017) to describe the convergence of nationalist interests with the selective embrace of LGBT+ rights. In the EU context with external countries, homonationalism manifests in the framing of LGBT+ rights not only as universal human rights but also as markers of "Europeanness" of modernity, civility, and progress. This normative framing positions queer inclusion as a defining feature of the European project,

juxtaposing the EU against both the “illiberal” Global South and racialized minorities within its own borders (Rao, 2014; Sloomaeckers et al., 2016).

Indeed, as Thiel (2021) notes, the politicization of LGBT+ rights through foreign policy tools often leads to norm contestation, particularly when these norms are deployed in asymmetrical power contexts. While some argue that LGBT+ rights promotion is not fundamentally different from the EU’s broader human rights agenda, it is crucial to recognize that these rights are often less institutionally entrenched and more culturally contested than more established norms like democratic governance or the rule of law (Ayoub, 2016). As a result, LGBT+ rights become symbolic fault lines that are easily scapegoated in moments of political tension or backlash, and used strategically by local elites to signal resistance against perceived Western intrusion, as it will be further developed in the next section 3.5. This precarious position renders them especially vulnerable in contexts where broader rights regressions are unfolding.

When European actors portray queerness as a uniquely Western value that is associated with reason, democracy, and human rights, they simultaneously position resistance to such norms as uncivilized, backward, or even dangerous. This binary patriarchal construction of international relations and geopolitics reproduces what Rao (2014), paraphrasing Spivak, describes as the “white gay savior” complex, wherein Western activists and institutions presume to rescue “brown gays” from “brown homophobes.” Such framing further erases local agency, flattens the diversity of queer lives in the Global South, and renders queer rights conditional upon alignment with Western liberalism.

The EU enlargement process exemplifies this dynamic. LGBT+ rights are frequently used as a litmus test of “Europeanness”, not only by institutions in Brussels but also by progressive actors in peripheral states seeking accession. This strategic use of LGBT+ rights to signal alignment with European values both instrumentalizes queer politics and fosters exclusionary nationalism. Bracke (2012) and Klapeer (2018) show how queer visibility in this context becomes a tool of symbolic convergence, with LGBT+ inclusion framed as evidence of modernity and fitness for integration.

Paradoxically, these same dynamics also fuel anti-gender movements both within and outside the EU, which contest what they perceive as cultural imperialism. From conservative populists in Europe to religious and political elites in Africa, the critique is often couched in

the language of sovereignty and tradition. Puar (2022) points out that this resistance, while reactionary, can still be interpreted as a response to homonationalist global ordering. Indeed, many anti-LGBT+ narratives emerging in the Global South are not simply homophobic but are reactions to externally imposed scripts that frame queerness as Western and inauthentic.

Moreover, within the EU itself, political actors often weaponize LGBTQI rights discourse in racialized and xenophobic ways. Far-right Members of the European Parliament MEPs frequently cast queer Europeans as under threat not from within European societies, but from Muslim migrants and racialized others. Statements by German MEP Nicolaus Fest from far-right group ID during the debate on declaring Europe an LGBTQI Freedom Zone (European Parliament, 2021) are a very clear representation of this securitization and weaponization of LGBT people and its rights, his words being:

“Germany once had a homosexual foreign minister, and Berlin and many other major European cities were led by homosexuals [...]. But conditions in the West have deteriorated. [...] In many neighborhoods in Berlin, Hamburg, Munich, but also in Paris, Brussels, or Amsterdam, homosexual couples no longer dare to walk through the city hand in hand. These people are not being threatened by Germans. Nor are they being threatened by Poles, Hungarians, or Slovenians — they are being threatened by Muslims. But this is the big taboo that one is not allowed to mention here. Because that would raise the question of Muslim migration and whether society is truly becoming more diverse, better, and more liberal as a result.”³

In such rhetoric, LGBT+ rights serve not as inclusive tools of emancipation, but as instruments of cultural superiority and civilizational boundary-making (Al-Kurdi, 2023).

Yet, this instrumentalization is not limited to reactionary forces. Even the EU’s own strategic documents such as the 2020 six-year LGBTIQ Equality Strategy adopted under the von der Leyen Commission frame LGBT+ rights within the priority of “promoting our European way of life: protecting our citizens and values” (European Commission, 2020). This framing

³ Original text in German here: “Deutschland hatte mal einen homosexuellen Außenminister, Berlin und viele andere europäische Großstädte wurden von Homosexuellen geführt [...] Aber die Zustände haben sich im Westen verschlechtert. [...] In vielen Vierteln in Berlin, Hamburg, München, aber auch in Paris, Brüssel oder Amsterdam trauen sich homosexuelle Paare nicht mehr, Hand in Hand durch die Stadt zu gehen. Diese Leute werden nicht von Deutschen bedroht. Sie werden auch nicht von Polen, Ungarn oder Slowenen bedroht, sondern von Muslimen. Aber das ist das große Tabu, das man hier nicht ansprechen darf. Denn das würde die Frage nach der muslimischen Migration stellen und danach, ob die Gesellschaft durch sie wirklich bunter, besser und liberaler wird.”

subtly implies that queerness is part of a normative European identity to be defended against external threats, be they migrants, Muslims, or illiberal states abroad. While the strategy emphasizes working with local actors and global allies, it remains embedded in a geopolitical narrative of values export and civilizational defense.

This dynamic is further complicated by incoherent application and unequal prioritization. The only time a European Union body has recognized same-sex criminalization laws as colonial legacies has been through a briefing (which is not even a legal document) by the European Parliamentary Research Service on *LGBTI in Africa* quoting that “Laws criminalizing same-sex relations are often a legacy of the colonial past” (Al-Kurdi, 2023) highlighting how the EU fails in consistently addressing this history in its external engagements. Similarly, while EU institutions regularly condemn anti-LGBTQ+ laws in states like Russia or Uganda, their critiques rarely extend to structural drivers of marginalization, such as poverty, lack of education, or authoritarian governance, all of which the EU is often complicit in reinforcing through trade deals and migration controls.

The 2021–2025 EU Gender Action Plan mandates that 85% of foreign actions contribute to gender equality, which in theory could mainstream SOGIESC inclusion. Yet, SOGIESC issues remain inconsistently embedded in development programming, often still with a very binary thought process behind addressing only women and girls as only targets for such issues (Bouris et al., 2025) and still in a very liberal and market centred mindset. This is partly due to varying commitments among EU member states, historical colonial linkages, and a broader prioritization of economic and security concerns over human rights in external relations (European Center for Development Policy Management, 2017).

Furthermore, when European leaders suggest withholding aid over LGBT+ rights, as during EU–Africa summits, African ambassadors rightly question the double standards: why are LGBT+ rights a precondition, while migrant rights and border abuses affecting African populations are overlooked? (Neslen, 2014). This asymmetry reinforces perceptions of “homocolonialism” and the use of queer rights to stigmatize non-Western cultures (Rahman, 2014) while ignoring Europe’s own complicity in global injustices.

Ultimately, queer theory invites us to critically assess how visibility, conditionality, and normativity function together in the EU’s external actions. While visibility can affirm marginalized lives, it can also expose queer people to new forms of discipline and

surveillance. While conditionality may appear as an effective tool, it may delegitimize local struggles, undermine civil society actors, and provoke violent backlash. As Cuny (2018) and Thiel (2021) argue, EU actors must move beyond the symbolic politics of conditionality and toward more context-sensitive, intersectional approaches.

This does not mean abandoning the promotion of LGBT+ rights per se. Rather, it requires rethinking the tools through which solidarity is enacted: investing in long-term partnerships with grassroots organizations; decentering Europe as the moral arbiter; and acknowledging the historical entanglements of colonialism, capitalism, and sexuality. Only through such reflexive engagement can the EU shift from a project of normative power to one of relational justice, one that takes seriously the complexities of queer life beyond its borders.

3.5 Global Gender Panic, Transnational Anti-gender Movements in the Global North (US & UK): A Foresight for the EU?

In the quest of queering EU's LGBT+ Rights promotion, a broader understanding of the current framework and views on sexual orientation and gender identity in the broader Western World outside of the European Union is needed in order to better understand what other transnational coalitions and strategies could be built. However, the current picture is quite grim. As documented by different CSOs in the field such as Outright International, this past decade is marked by a dangerous turning point in the global battle over gender rights, with "gender panic" emerging as a defining political tool of contemporary authoritarianism (Yesudas et al., 2025). This panic is neither isolated nor spontaneous: it is orchestrated across borders, advanced by state actors and transnational networks seeking to reimpose patriarchal and heteronormative social orders under the guise of restoring "truth," "biology," and "common sense." As this chapter explores, these developments cannot be viewed in isolation from the European Union or its postcolonial legacy. Rather, the rise of anti-gender ideology rhetoric has diffused very prolifically in other western countries such as the United States and the United Kingdom, further disrupting the illusion of the West as a unified, queer-friendly bloc, and farthing exposing the limitations of a top-down, norm-exporting model of LGBT+ rights from a Western perspective.

The circulation of regressive gender discourses across borders shows that norm diffusion is neither linear nor unidirectional in time. Just as European and North American institutions once sought to export liberal values to the Global South, today they brew reactionary

ideologies that destabilize internal commitments to human rights. These dynamics reverberate within the EU itself, reinforcing the central thesis of this chapter: that the EU's image as a bastion of progressiveness must be re-evaluated in light of how regressive politics in its own countries and across the Atlantic, are becoming a norm and are eroding rights from within.

3.5.1 United States: The Codification of Gender Panic and the Politics of Eradication

The re-election of Donald Trump in 2024 has catalyzed a new era of federal anti-LGBTQ+ policy, with particular focus on erasing transgender and nonbinary identities from public life. Through executive orders such as *Defending Women from Gender Ideology Extremism and Restoring Biological Truth to the Federal Government* (Trump, 2025), the administration is imposing a biologically deterministic, binary definition of sex that undermines the legal existence of trans people, denies access to gender-affirming care, and re-criminalizes inclusive practices in education, healthcare, and public institutions (Knauer, 2025). These efforts are paired with the order *Combating Race and Sex Stereotyping*, which reframes diversity, equity, and inclusion (DEI) as discriminatory, weaponizing the language of “reverse racism” and “reverse sexism” to dismantle decades of civil rights protections (Ibid.)

What is unfolding is not just a backlash; it is what Nancy J. Knauer (2025) coins as a Politics of Eradication, grounded in the belief that LGBTQ+ people should not exist. This politics mobilizes populist sentiment to frame trans and queer existence as threats to children, women, and national identity. It draws power from the erosion of democratic norms, institutional legitimacy, and electoral trust (Keck, 2023). In this context, the MAGA movement has succeeded in rebranding anti-LGBTQ+ hate as a form of patriotic common sense, weaponizing “gender ideology” as a catch-all villain for societal decay (Rogers & Radcliffe, 2023). These regressive norms, far from being homegrown only, have become ideological exports. Trump's withdrawal of foreign aid to LGBTQ+ organizations globally demonstrates how the U.S. now wields foreign policy not to promote rights, but to punish progressive gender norms and embolden authoritarian governments abroad (Casey, 2025; Ryan & Keating, 2025).

This exportation of gender panic contributes directly to the global anti-gender movement, with ripple effects that reach back into the EU. The same tools used by U.S. conservatives (moral panic, disinformation, populist nationalism) are increasingly evident in European

far-right parties. The once one-directional image of the West exporting rights to the rest of the world is now reversed: the U.S. has become a key exporter of reactionary ideology. One striking example is the World Congress of Families, an American organization, developed in 1955 by US and Russian Academics to anchor efforts on traditional families advocates (Stoeckl, 2020), which is nowadays identified as a hate group by the US-based Southern Poverty Law Center due to its aggressive opposition to LGBT rights. The construction of these bonds among the US and Russia reflects this growing coordination between strong anti-gender movements. Despite historically tense relations, we are witnessing the alignment of Global North states on matters of "outsourcing autocratic anti-LGBTI soft power" (Bonny 2019), using platforms like the World Congress of Families, which receives funding from both Russian and American conservative sources.

3.5.2. United Kingdom: Legal Rollbacks and the Institutionalization of Gender Essentialism

The UK's recent legal and political trajectory illustrates a dramatic regression in transgender rights, starkly contradicting its self-image as a liberal democracy. Despite framing itself as a beacon of LGBTQ+ inclusion, the UK has earned the derisive moniker "TERF Island" (Baska, 2021), a reference to the widespread influence of trans-exclusionary radical feminism (TERF) in both public discourse and policy. TERF ideology, rooted in the biologically essentialist belief that sex is fixed and immutable, has gained traction in political debates, media narratives, and civil society activism, fueling an anti-trans moral panic (Hotine, 2021).

This ideological shift has been codified in law and administrative practice. The UK's Gender Recognition Act still mandates that individuals seeking to legally transition must obtain a medical diagnosis of gender dysphoria and approval from a gender recognition panel (McDonald, 2023), creating unnecessary barriers to gender self-determination. Furthermore, the Conservative government's exclusion of transgender people from its 2022 legislative ban on conversion therapy revealed a stark unwillingness to afford equal protections to all members of the LGBTQ+ community. Legislative inaction and judicial decisions, such as the 2025 UK Supreme Court ruling in *For Women Scotland v. The Scottish Ministers*, which redefined "sex" under the Equality Act to mean sex assigned at birth, compound this rollback of rights (Newey, 2025).

The British Medical Association strongly condemned the ruling as “reductive, trans and intersex-exclusionary, and biologically nonsensical,” highlighting that sex and gender are medically and socially complex phenomena that defy binary classifications (Human Rights Watch, 2025). The ruling has already had tangible repercussions: it undermines trans-inclusive policies in schools, healthcare settings, and research institutions. Gender and sexuality research centers across the UK have raised the alarm over the decision's chilling effect on academic freedom and public health.

These domestic developments also illuminate a larger paradox in liberal Western governance: namely, that liberal democratic institutions can be repurposed to advance exclusionary, even authoritarian, agendas. As right-wing populism spreads across Europe, the UK has become a key exporter of anti-trans rhetoric. UK-based narratives about “protecting women and children” from so-called “gender ideology”, a mischaracterization highlighted by the Council of Europe’s Committee on Equality and Non-Discrimination (Chikha, 2021), have been adopted by conservative and far-right actors across the EU. These actors instrumentalize bioessentialist discourse not only to attack transgender individuals, but also to challenge broader human rights norms related to gender, race, and sexual orientation (Snow, 2021).

Such developments challenge the persistent narrative of Western exceptionalism in gender rights. The UK’s colonial legacy of enforcing rigid gender binaries is not merely historical; it is being reactivated and globalized. Trans-exclusionary ideologies now circulate transnationally via postcolonial and digital networks, shaping right-wing policies in EU member states. This reverse flow of illiberal ideologies complicates the assumption that the diffusion of norms on gender and sexuality moves only from “progressive” Global North states to the Global South. It reveals instead a more entangled process, one where the West’s own internal regressions ripple outward, undermining the EU’s external credibility and domestic cohesion.

3.5.3. Transnational Antigenderism and the Boomerang Effect on the EU

The converging cases of the U.S. and UK illustrate the growing influence of transnational anti-gender movements: coalitions of politicians, religious institutions, think tanks, and online actors working across borders to undermine gender rights. These movements circulate legal templates, strategic rhetoric, and financial support to resist what they characterize as

“gender ideology.” As such, they are not only fighting gender diversity, but reconfiguring state institutions in ways that make democratic rollback possible.

These developments disrupt the enduring myth of Western superiority in advancing gender and sexual rights. Far from being relics of the past, colonial impositions of rigid gender norms are being reactivated and transnationalized, most notably through the global spread of trans-exclusionary ideologies. The emergence of a far more entangled dynamic can be noticed: one where the West’s own internal regressions reverberate outward, eroding both its external legitimacy and its internal cohesion. Seeing this scenario, this shifting landscape suggests that the backlash against LGBT+ rights is less about geographic or cultural divergence, and more deeply rooted in global structures, such as patriarchy, capitalism, or the intensification of neoliberal politics, that cut across borders and drive illiberal turnarounds worldwide.

Within the EU, these same discourses are gaining traction. From Poland’s “LGBT-free zones” to Italy’s redefinition of family policy under Meloni’s leadership, anti-gender ideology serves as a unifying framework for far-right parties seeking to consolidate power through culture war. The EU now finds itself confronted with the boomerang effect of its own colonial and Cold War-era approaches to norm diffusion. Having once externalized human rights promotion as a civilizing mission, it now faces internalized resistance framed in almost identical terms: national identity, tradition, and family values.

The top-down approach to LGBT+ rights promotion, often led by state institutions or supranational bodies, has proven vulnerable. It can produce visibility without safety, marginalize local voices, and provoke backlash framed as resistance to foreign imposition. The populist playbook capitalizes on this dynamic, presenting human rights as elite and alien, while positioning regressive norms as authentically local. The implication for the EU is clear: unless rights promotion becomes grounded in horizontal, participatory, and context-specific strategies, it risks accelerating the very resistance it seeks to challenge.

3.5.4. Conclusion: Queering EU Foreign Policy in an Age of Backlash and Boomerangs

This chapter has critically examined the European Union’s approach to LGBT+ rights external promotion in an increasingly hostile global environment, marked by the transnational spread of anti-gender ideologies and the unraveling of liberal democratic norms. Through the

lens of queer theory, we have exposed the contradictions inherent in the EU's strategy: a model very dependent on conditionality that, while claiming to advance equality, often reproduces neocolonial dynamics and instrumentalizes queerness as a symbol of "Europeanness." In doing so, it risks transforming rights into hierarchies, and visibility into vulnerability.

As shown in the cases of Uganda, Ghana, and the EU's Eastern neighborhood, the external projection of LGBT+ rights as a civilizational benchmark without adequate local consultation or intersectional grounding can intensify backlash rather than mitigate it. Anti-gender movements readily seize on this symbolic framing, weaponizing binaries such as modernity versus tradition, West versus non-West, and rights versus culture, to galvanize resistance and reposition repression as sovereignty.

This pattern is not limited to the Global South. The rise of coordinated anti-gender politics in the United States and the United Kingdom highlights the erosion of the idea that the West is a unified, progressive bloc. As detailed in Sections 3.5.1 to 3.5.3, the same Global North actors who once exported liberal norms are now exporting reactionary ideologies. Transnational anti-gender networks (linking far-right parties, religious conservatives, and big corporations) have created a feedback loop in which illiberal discourses circulate back into the EU, threatening the very rights frameworks it seeks to uphold.

In this context, the EU finds itself in a paradoxical position: both as a self-proclaimed normative power and as an unwitting conduit for the global backlash against gender and sexual diversity. Responding to this moment requires more than procedural defense: it calls for a dual process of resistance and reimagining.

Resistance means upholding the EU's existing legal and normative commitments, including ensuring that member states adhere to the Charter of Fundamental Rights and confronting internal violations with greater consistency and accountability. But reimagining is equally vital. It demands that the EU abandon technocratic, top-down models of norm diffusion and instead adopt a participatory, grassroots approach that empowers civil society, funds community-led initiatives, and supports transnational queer networks without instrumentalizing them.

Crucially, this means rejecting the illusion of a monolithic, progressive West. The recursive and multidirectional nature of norm flows must be acknowledged: liberal democracies are not

immune from exporting illiberalism. The diffusion of values, whether emancipatory or regressive, is shaped by historical legacies, power asymmetries, and political opportunism. Any meaningful strategy for rights promotion must therefore be context-specific, historically aware, and structurally reflexive.

This is where queer theory becomes indispensable. As both a critical and constructive toolkit, queer theory enables us to unpack and unsettle the dominant logics of foreign policy, rights conditionality, and global governance. It calls for a decolonial, relational approach that centers marginalized voices, disrupts binary thinking, and resists the appropriation of queerness for geopolitical gain.

These insights will be further developed in the next and final chapter, which turns toward the future. It will explore how queer theory not only critiques current paradigms but also offers proactive and strategic tools for navigating and resisting the shifting terrain of global gender politics. In doing so, it lays the groundwork for a more just, adaptive, and transformative EU approach to international solidarity and sexual and gender justice.

Chapter 4: The (Im)possibility of Queering EU Promotion of LGBT+ Rights? Recommendations & Reflections

4.1 Framing the (Im)possibility of Queering

This final chapter engages with the tension at the heart of this research: the potential and limits of queering the European Union's promotion of LGBT+ rights. It builds upon the preceding chapters, which have interrogated how EU policy constructs LGBT+ subjects and political communities through liberal rights-based discourses and norm diffusion that often reproduce Eurocentric, homonormative, and politicized frameworks. Rather than concluding with a definitive set of policy proposals, this chapter reflects on the productive ambiguities and contradictions that emerge when queer theory confronts the institutional logics of policy-making. In doing so, it resists the impulse to offer closure, instead centering the (im)possibility of queering as both a critical horizon and a space for reflexive political engagement.

4.1.1 Queering as Disruption, Not Inclusion

To queer EU LGBT+ rights promotion is not simply to improve it, diversify its scope, or make it more inclusive. Instead, queering here entails a critical unsettling of the normative foundations upon which policy is built, which, as argued in the first chapter, are foundations that privilege visibility, respectability, and legibility within a liberal framework. Following the work of Warner in *Normal or Normaller* (1999), queering challenges the taken-for-granted assumptions about sexuality, citizenship, and rights, which are elements that nowadays structure EU engagements with LGBT+ issues at home and abroad as seen in the previous case studies. In this sense, queering is not merely a method of critique but a radical disorientation: a refusal to make queer lives assimilable to state logics or geopolitical interests.

However, the very notion of queering EU action on LGBT+ rights confronts a constitutive tension: can a radical mode of critique that resists normativity be translated into the institutional language of policy without losing its edge? The (im)possibility in the title of this

chapter refers to this impasse. Yet impossibility, rather than functioning as a negative limit, is embraced here as a generative condition. Drawing on José Esteban Muñoz's (2019) notion of queerness as a horizon "not yet here," but an orientation toward different futures, this chapter engages with impossibility as a starting site of political imagination. Queerness is not simply what is excluded from the present; it is what exposes the violence of the present's terms of inclusion, and gives the space for sparking dialogues within queer communities to organize on future steps to take.

4.1.2 Facing Queer Negativity and Material Realities

At the same time, it is important to resist romanticizing impossibility as inherently virtuous. Lee Edelman's (2005) anti-social thesis critiques political imaginaries organized around reproductive futurism and social order, calling instead for a queer negativity that refuses the promise of progress. Yet this position, too, has been critiqued for its abstraction and potential political nihilism, and queer theorists like Halberstam (2008) argue that queer negativity can offer a space of resistance, but it must also be attentive to material conditions, lived experiences, and the need for survival. In the context of EU external relations, these tensions are palpable: how can we simultaneously honor the radical potential of queer critique while acknowledging the real stakes of global LGBT+ struggles?

The EU's approach to LGBT+ rights, as shown in earlier chapters, relies on liberal rationalities of governance, conditionality, and norm diffusion that sometimes takes away agency from queer lives by framing them through tropes of victimhood, silence, or gratitude (Ayoub, 2016; Bosia & Weiss, 2013) while at the same time, it also politicizes them in order to construct identity politics that serve to gain geopolitical interests and power (Thiel, 2021). Such framings reproduce a civilizational logic in which the EU becomes the subject of progress and tolerance, while non-European others are cast as lagging behind. This logic is both colonial and paternalistic, even when wrapped in the language of rights. Queer critique troubles this framework by foregrounding how identities and desires are not stable categories to be protected, but unstable assemblages that exceed the state's capacity to recognize or contain them (Butler, 2004).

4.1.3 Risks of Co-option and the Limits of Critique

However, queer critique itself is not without its discontents. As critics have noted, the turn to queerness as refusal or disruption can become politically ambivalent, especially when it distances itself from pragmatic struggles for safety, recognition, and access to resources (Duggan, 2003; Rao, 2014). In the context of policy, the deployment of queer theory must therefore walk a tightrope. On one side lies the risk of co-option, where queerness becomes a branding exercise for progressive institutions as a facade without altering their neoliberal system underpinned on it. On the other side lies the risk of retreating into critique that is so radical it becomes detached from the political realities it seeks to transform.

This chapter attempts to hold that tension without resolving it. Rather than advocating for a full-fledged queer policy, it turns to what Sara Ahmed (2010) calls a “feminist killjoy” stance: a position that refuses to smooth over disruptions of social harmony by speaking out against injustice, particularly sexism, racism, and heteronormativity. In this case, related to the EU, it could be referred to as institutional harmony instead. This approach is not anti-policy, but it is anti-uncritical policy. It opens up space to imagine interventions that do not simply extend rights or visibility to new subjects, but that ask more fundamental questions about who is behind, whose rights are being discussed, whose visibility, and under what conditions.

4.1.4 Transnational Solidarity and the Decentering of Europe

Applied to the EU’s external action, this would imply that queering must take seriously the paradoxes of promoting LGBT+ rights while reproducing epistemic, cultural, and material hierarchies. It involves politicizing the very terms of inclusion and protection, rather than assuming these are unqualified goods. For instance, queer critiques of EU asylum policies have shown how such regimes compel LGBT+ refugees to conform to Western-coded scripts of sexuality and gender in order to be recognized as credible or vulnerable (Shakhsari, 2014; Luibhéid, 2008).

Furthermore, queering must be relational and transnational. It cannot reify the EU as the central agent of progress. Rather, it must engage in solidarities with queer movements in the Global South that often reject both local heteropatriarchies and global neoliberal governance. As Tamale (2014) and Nyanzi (2014) demonstrate, African queer activism frequently resists liberal rights discourse, drawing instead on indigenous epistemologies, spiritual practices,

and communal political imaginaries. Queering EU foreign policy involves aligning with such insurgent knowledges; not by translating them into liberal terms, but by decentering the EU's epistemic authority and embracing alternative visions of freedom and justice.

4.1.5 Queering Without Guarantees: Toward a Radical Political Stance

Importantly, queering does not offer a final blueprint or set of best practices. It resists institutional codification and thrives on openness, contradiction, and provisionality. It insists on unsettling what appears self-evident; including the categories of "LGBT+," "rights," and even "progress." As such, queering is not a solution, but a stance: a commitment to keeping the political open, to resisting closure, and to imagining otherwise.

In the end, queering EU LGBT+ rights promotion is not only about diversity as inclusion. It is about transforming the very grounds on which inclusion is imagined. This means moving beyond recognition and representation toward structural redistribution, epistemic humility, and radical solidarity. It requires the EU to engage not as a savior, but as one actor among many in a polyphonic, contested, and decolonial global field. In such a vision, queerness is not simply protected but it is given a real platform that allows it to unsettle, to create, and to reshape the political system itself.

4.2 Queering EU Policy: Constraints, Contradictions, and Political Possibilities

As seen throughout the thesis, the attempt to queer EU LGBT+ rights promotion is immediately confronted with deeply entrenched limitations within institutional policy making. These limitations are not merely technical or bureaucratic, but structural, embedded in how the European Union conceptualizes rights, agency, and the international subject. This section explores how queering is both resisted and partially absorbed by EU policy discourses, through three interconnected dynamics: the liberal grammar of inclusion, the geopolitics of sexual exceptionalism, and the reproduction of homonormativity within global governance. These dynamics do not simply delineate the boundary of queering but constitute a terrain of ongoing political struggle.

4.2.1 Liberal Inclusion and the Paradox of Rights

At the heart of EU LGBT+ rights promotion lies a liberal grammar that privileges recognition, visibility, and legal protection as the primary mechanisms of inclusion. From the various instruments analyzed in Chapter 2, such as the List of Actions to Advance LGBTI Equality and the LGBTIQ Equality Strategy, a strong commitment is articulated to combat discrimination and violence based on sexual orientation and gender identity. This is operationalized through legal reform, protection from persecution, and support for civil society. These commitments are often significant, particularly in contexts where LGBT+ persons face systematic marginalization. However, they are embedded in a liberal rights framework that assumes a stable and coherent subject seeking recognition from the state or international actor.

Queer theory has long critiqued the limitations of liberal rights based politics, arguing that the very terms of inclusion can depoliticize radical movements and reinforce neoliberal rationalities that uphold heteronormative and cisnormative structures (Brown, 2015; Butler, 2004). By emphasizing recognition over redistribution or structural transformation, rights discourses often leave intact the conditions and hierarchies that produce queer precarity in the first place, such as access to proper work, health care, housing among others (Ward, 2022). The paradox that emerges is that queering, understood as a practice of destabilization and dissent, is frequently absorbed into the stabilizing logic of EU policy frameworks, thereby limiting its transformative potential.

4.2.2 Sexual Exceptionalism and the Geopolitics of Progress

A second major constraint, as explored in Chapter 3 and throughout the thesis, emerges from the geopolitics of sexual exceptionalism. This concept refers to the construction of Western liberal democracies as uniquely progressive in their acceptance of LGBT+ rights, while non Western societies are portrayed as backward, homophobic, or resistant to modernity (Puar, 2007; Bosia and Weiss, 2013). As a normative power, the EU often frames itself as a global leader in human rights by positioning LGBT+ inclusion as evidence of its democratic maturity and cultural modernity. As seen, this is reflected in instruments of external action, such as enlargement conditionality, neighborhood policy, and development aid, where the promotion of LGBT+ rights is linked to broader benchmarks of democratic progress.

Through the case studies of Uganda and Ghana, it becomes clear how this framing reproduces a colonial logic in which queerness is imagined as a Western invention that must be exported outward. This narrative obscures indigenous queer histories and locally rooted forms of resistance in the Global South, erasing the complex and context specific ways in which gender and sexuality are lived and negotiated (Rao, 2014; Tamale, 2014). Even when motivated by good intentions, EU interventions risk instrumentalizing queer struggles to reaffirm a Eurocentric vision of development and civilization. As such, queering becomes constrained by its function within a broader project of normative governance, unable to fully resist the imperial undercurrents that shape EU policy discourse.

However, rejecting the EU's role altogether risks reinforcing another problematic binary, one in which queerness is either fully co-opted by the West or must be preserved in a supposedly authentic non-Western form, as seen in the case of Ukraine, Georgia and Russia. A queer analytic resists such dichotomies by attending to the contradictions and entanglements that structure global LGBT+ politics. Rather than seeking purity or coherence, queering invites us to examine how power circulates through categories, institutions, and practices that present themselves as neutral or progressive. In this sense, the EU's use of sexual exceptionalism does not only limit queering but also provides an occasion to deepen it, to ask how queerness might expose and disrupt the very geopolitical fantasies underpinning EU identity.

Moreover, the growing global polarization around LGBT+ rights cannot be only understood through arguments of cultural essentialism or traditionalism. Rather, it can be understood as a revisionist reaction to the broader social and political transformations of late or postmodern neoliberal societies. These include increasing socio-cultural diversity, pluralism, gender (in)equality, secularization, and the erosion of coherent national identities under globalization (Giddens, 1991). Consequently, a narrow focus on LGBT+ rights that does not engage with these larger dynamics may yield limited results, as shown through previous analysis of anti-gender and anti-LGBT rights movements in section 3.5.

At the same time, SOGIESC issues are increasingly instrumentalized by political actors, precisely because they connect with intimate aspects of people's everyday lives, including questions of sexuality, family, and morality. This dynamic enables political actors to mobilize support through performative opposition or exaggerated endorsement. In this context, LGBT+ individuals may become pawns in broader political struggles, and their hypervisibility risks masking other urgent governance issues.

4.2.3 Homonormativity and the Domestication of Queer Politics

A third site of constraint emerges through the reproduction of homonormativity within EU policy practice. Homonormativity refers to the assimilation of queer life into neoliberal ideals of privacy, consumerism, family values, and respectability, often exemplified by the celebration of same sex marriage, nuclear family formation, and entrepreneurial citizenship (Weiss, 2018; Lenon, 2019). In the EU context, this manifests in a preference for engaging with LGBT+ organizations that are professionalized, moderate in their demands, and capable of working within existing legal and political institutions (Rao, 2020). Consequently, more radical, intersectional, or grassroots movements may be sidelined or excluded altogether.

This trend narrows the spectrum of queerness that is seen as legitimate or politically useful. Through its funding mechanisms, partnerships, and diplomatic tools, the EU incentivizes forms of activism and discourse that align with institutional priorities. This contributes to a process of domestication, in which queer politics becomes a matter of rights management rather than resistance (Weber, 2016). Queer critique, which insists on the non-normative, the disruptive, and the anti-assimilatory, often finds itself incompatible with policy frameworks that demand coherence, clarity, and strategic effectiveness.

Furthermore, the EU's targeted engagement with the LGBT+ civil society is frequently accompanied by individualized understandings of sexuality and gender identity that do not go beyond the question of being LGBT+. These approaches detach queerness from broader questions of race, class, coloniality, and migration. As a result, intersectional voices (particularly those of trans, racialized, and migrant communities) are often marginalized, either because they challenge the respectability politics of mainstream organizations or because they reveal structural injustices that EU policies themselves may sustain (Rahman, 2014; El-Tayeb, 2012). The consequence is a queer politics that is visible yet silenced, domesticated rather than disruptive.

Transnational Queer Studies and Queer IR scholarship have highlighted how LGBT equality agendas advanced by both state and non-state actors are frequently framed through problematic homonormative, racist, Islamophobic, or colonial rescue narratives (Richter-Montpetit & Weber, 2017). Nevertheless, despite these limitations, queering still carves out spaces for refusal and subversion. When activists challenge donor conditions, reinterpret institutional documents, or reject imposed identity frameworks, queering reasserts

itself as a mode of resistance that exceeds institutional control (Thiel, 2021). These interventions may be temporary, partial, or ambiguous, but they nonetheless reveal that queerness cannot be entirely governed.

4.2.4 Securitization, Militarization, and the Limits of Queer Possibility

Another side of constraint can be seen in the EU's increasing turn toward defense, strategic autonomy, and securitization (especially in the wake of Russia's invasion of Ukraine, as seen in 3.3.1) and the challenge it poses to any queering of its internal and external policies. The *Strategic Compass* (EEAS, 2021), a defense policy initiative by the European Commission, has been framed as a tool to "defend our values and interests" and to articulate a vision of the EU as a geopolitical actor prepared to protect itself through militarized means. However, as feminist scholarship has long argued, the prioritization of "order" in international relations often comes at the expense of gender justice (Tickner, 2018) and is constructed through not a neutral or peaceful arrangement but one shaped by patriarchal and racialized violence, ranging from military interventions to more indirect systematic marginalization of women, queer people, and racialized populations in global politics (True, 2018).

Feminist theorists such as Cynthia Enloe (2014) have emphasized how the public/international and private/domestic spheres are deeply interconnected, exposing the myth of a disembodied, rational, sovereign political actor. The state, and by extension state-like actors such as the EU, constructs itself as invulnerable and orderly by externalizing vulnerability onto feminized, racialized, and queered others. This is visible in the *Strategic Compass*, which only mentions "migrants" as agents only once (EEAS, 2021: 5), while irregular migration is framed increasingly securitized as a threat from the Global South (EEAS, 2021: 34, 57). Here, the EU's border regime functions as a racialized technology of ordering, aligning with Weber's (2016) concept of the *unwanted migrant*: a figure perceived as desiring modernity but misdirecting that desire by migrating north rather than embracing neoliberal development at home.

Such tropes are not incidental; they help justify and legitimize European sovereignty claims through militarism. The *wanted/unwanted* dichotomy becomes the terrain through which militarized humanitarianism is legitimized. The EU's foreign and security policy, in this view, relies on a constellation of figures (the *undevelopable terrorist*, the *untrainable soldier*, the *perverse sexual subject*, all of them following a binary heterosexual logic) to demarcate who

is entitled to rights, protection, and recognition, and who remains excluded as seen from the language used in the Security Compass (Mühlenhoff, 2025)

As seen throughout this thesis, this is especially evident in the EU's selective deployment of LGBT+ rights in foreign policy. Through the logic of *homonationalism* (Puar, 2007), LGBT+ rights are often promoted not as part of global justice, but as symbols of European modernity, used to contrast the tolerant West with supposedly backward others. These logics are not only racialized but also deeply gendered and heteronormative. EU sovereignty becomes legible through the construction of the sexually deviant or immature Other, who is either to be disciplined “at home” in the Global South or rendered forever outside the bounds of development and inclusion.

In this context, feminist and queer theorists call to go beyond surface-level inclusion. They urge a rethink of security itself, away from masculinist violence and protection and toward collective care and interdependence (Butler, 2022; Enloe, 2014). Security frameworks must be understood as deeply gendered and sexualized, structured by what is made visible and grievable (Butler, 2004), and by whom.

These dynamics are not confined to EU foreign policy. The resurgence of right-wing and fascist politics across Europe and the US, increasingly targeting sexual and gender diversity, threatens to roll back hard-won rights (Yesudas et al., 2025). Sexuality norms are being re-embedded at the center of domestic and international politics, not to extend protections, but to redraw the lines of acceptable citizenship and sovereign legitimacy. In this climate, even progressive rights discourses risk being co-opted into nationalist, securitarian projects. Thus, a queer analysis is necessary not to treat sexuality as just another variable in international relations, but to reveal how sovereignty, militarism, and sexuality are co-constitutive (Mühlenhoff, 2025).

Importantly, this critique is not abstract. Civil society actors have begun to voice concern over the entanglement of LGBT+ rights with broader securitarian agendas. ILGA-Europe, for instance, has pointed to the weaponization of queer subjects in narratives about defending European democracy, where LGBT+ rights are framed not as emancipatory struggles but as ideological markers in a geopolitical confrontation with internal and external “threats” (2025). Similarly, IGLYO (2025) and other organizations have co-signed a statement expressing concern about the EU's growing emphasis on criminalization and security in responding to

challenges faced by vulnerable collectives. These interventions echo the argument that even progressive rights discourse can be co-opted into nationalist and militarist projects, particularly when queer subjects are made to “stand in” for European modernity, civility, or superiority.

4.2.5 Queer Worlds Beyond Human Rights

Last but not least, alongside these dynamics, there is a growing body of critique suggesting that queer engagement with human rights has diluted rather than amplified its radical potential (Kapur, 2017). While a conceptual distinction is often made between LGBT+ as fixed identity categories and queer as a critical, anti-normative project, this line blurs in international advocacy. Sometimes the Q is appended to the LGBT acronym, and at other times LGBT actors pursue agendas that could be described as queer. However, the radical impulse behind queer (its capacity to contest and unsettle dominant norms) is often redirected into frameworks that reinforce those very norms (Otto, 2018).

Rather than destabilizing the foundations of human rights, queer advocacy often replicates their underlying structures. Human rights law remains rooted in binary gender categories, hierarchical gender relations, and frameworks that reproduce racial and cultural exclusions. What began as an effort to denaturalize and denormalize gender and sexuality becomes instead a mechanism for their reification and governance.

This trend is not isolated to queer politics. Feminist human rights advocacy has seen similar dynamics, particularly in the securitization of issues such as sexual violence, anti-trafficking, and the Women, Peace and Security agenda. As discussed in Chapter 1, the institutionalization of Feminist Foreign Policy provides a clear example of how formerly radical agendas are appropriated into frameworks that prioritize liberal governance, human security, and institutional legibility (Bouris et al., 2025).

Thus, it becomes necessary to question whether the normative versus anti-normative binary remains adequate. Rather than treating these positions as fixed opposites, Queer Theory invites us to move beyond this dichotomy. It calls for a search for political imaginaries outside liberalism, not illiberal, but *non-liberal*, where queerness can operate on entirely different terms (Kapur, 2017). These are spaces where queer radicality is not filtered through the logics of rights or recognition but is expressed through alternative visions of community,

ethics, and political life. In these spaces, we do not find the queering of human rights but rather the emergence of queer worlds beyond the framework of human rights altogether.

4.3 Rethinking EU Engagement through a Queer Lens

Building on the earlier discussion of the EU's normative constraints, contradictions, limitations and possibilities in advancing LGBT+ rights abroad, this section rethinks EU engagement through a queer lens. If queering offers both critique and strategy, it also compels a rethinking of how the EU imagines and enacts its engagement with LGBT+ rights at home and abroad. This queering is not a technocratic revision of existing instruments but a radical reorientation of relationality, epistemology, and political commitments. This section outlines how queering can reconfigure EU LGBT+ rights promotion in four overlapping areas: mutual engagement, epistemic humility, institutional transformation, and new forms of solidarity.

4.3.1 From Norm Export to Mutual Engagement

A key insight of queer critique is the rejection of the EU's self-image as a normative power exporting universal rights. The dominant framework often presumes the EU as a beacon of modernity, civilizing "backward" others (Ayoub & Paternotte, 2019), a logic that imposes a linear, Western Eurocentric teleology of sexual progress that collapses cultural complexity (Browne et al., 2021; Mizielinska & Kulpa, 2013).

Queering this vision requires shifting from norm export to mutual engagement. This involves recognizing that rights are historically and culturally situated and that the EU does not possess a superior point of view in regards to LGBT+ rights promotion. A queered EU would co-create knowledge with, rather than for, LGBT+ communities in the Global South (Tamale, 2014), privileging local expertise in horizontal partnerships.

Yet, EU external action frequently fails to meet the basic threshold of non-coloniality: voluntary and equal participation. Conditionality mechanisms tied to trade, aid, or diplomacy produce asymmetrical relationships and resemble coercive impositions more than cooperation (Thiel, 2021). Politicization of these norms often fuels backlash, where resistance to EU conditionality becomes a performance of sovereignty.

Localized framing strategies can open alternative pathways. Among different suggestions, it is noted that reframing novel rights norms in terms familiar to domestic traditions makes

them more politically viable (Ayoub, 2019). Even economically utilitarian arguments, such as Alimi's (2014) report on the World Bank's estimation of a \$23.1 billion cost to India from anti-gay stigma, can reframe the issue for domestic policymakers. But once again, such framings are risky from a queer theory perspective because they could end up reducing queer life to cost-benefit analyses, reinforcing neoliberal logics rather than challenging them.

4.3.2 Embracing Epistemic Humility

A queered EU must also practice epistemic humility, rejecting the idea that its approach is self-evidently rational or morally superior. This humility means confronting the dimensions of knowledge production itself, drawing on the critique of universal knowledge through the idea of situated knowledge (Haraway, 1988) and on reflections on queer sexualities as both affective and epistemic disturbances (Rao, 2014).

Queerness, with its inherent ambiguity, illegibility, and refusal of closure, acts as a disruptive force against hegemonic forms of knowing. Embedded within this is the notion of queer (un)knowing, which challenges epistemic certainties and normative orders (Lesutis, 2023). Embracing this stance requires a form of epistemic humility that faces the erotic and affective dimensions attached to knowledge production. Queering policy means resisting the urge to translate all differences into manageable policy categories. Terms like “LGBT+” carry histories and epistemologies rooted in Western identitarian logics that may misrecognize or erase local sexual subjectivities (Nyanzi, 2013).

Thus, the EU must learn to listen without assimilating by also returning space and resources without the use of political conditionalities to build common and genuine platforms. This includes supporting bottom-up movements that challenge neoliberal, racist, or carceral regimes (Lamble, 2013; Grady et al., 2012), even when these critiques implicate the EU itself. Activists working across HIV/AIDS, reproductive justice, or gender-based violence already employ intersectional framings that reject a siloed or depoliticized rights discourse in order to obtain better collective results (Nabaneh & Ngwena, 2023).

Transnational CSOs increasingly center local needs and practices independent of EU funding objectives, increasing their legitimacy and avoiding charges of foreign influence (Ayoub, 2019). Where civic space is shrinking, SOGIESC actors have strategically expanded their frames to connect with broader health or human rights concerns and thanks to this discursive flexibility, the backlash triggered by a narrow, identity-driven focus is further evaded.

4.3.3 Restructuring Institutional Frameworks

Queering EU engagement requires a restructuring of the institutional rationalities that govern its external and internal actions. As seen in already existing frameworks, such as the LGBTIQ Equality Strategy (2020–2025) in section 2.2.3, they often risk technocratizing queer politics by framing inclusion through depoliticized metrics and checklist approaches. Despite rhetorical commitments to inclusivity, the Strategy has been critiqued for its lack of intersectionality and accessibility while largely failing to engage with the lived realities of LGBTIQ people with disabilities, racialized individuals, and other marginalised communities.

Following theory on intersectionality approaching institutional settings, a queered institutional logic would prioritize pluralism and contingency over coherence and legibility. Scholars studying rights-based movements find that coalitions become transformative when they focus beyond single-issue “wins,” redistribute resources to marginalized groups, and build sustained unity across diverse movements, rather than flattening differences in the service of coherence (Adam, 2017).

Such transformation would also include recalibrating support mechanisms for domestic queer activism. Support must be responsive rather than prescriptive, guided by the needs of activists rather than EU visibility metrics. Strategic engagement still matters, but without reflexive conditionality or instrumentalization.

EU development and neighborhood policies where LGBTI rights have sometimes advanced rapidly, such as in the case of Croatia (through enlargement conditionality) but selectively should be re-evaluated as backlash after accession is becoming more and more accentuated across the EU. On top of this, the risk of EU-branded LGBT+ rights becoming associated with external imposition have fueled transnational anti-gender and anti-LGBT movements, especially in countries with contexts of populist backlash (Velasco, 2023) such as the cases we have explored of Hungary or Georgia or even beyond in the Global South.

To counter this, localization becomes essential. Many activists beyond the EU have reclaimed pre-colonial or indigenous histories of same-sex relations to argue that it is homophobia, not homosexuality, that is foreign (Kushner, 2019). In this way, regional institutions can act as buffers against backlash, making regional solidarity an important strategic node (Gonsalves, 2021), an idea that will be further explored in the following section.

4.3.4 Queering Solidarity

Finally, a queer approach would require rethinking solidarity itself by moving away from paternalistic models of intervention toward mutual, risky, and transformative alliances. Following Spivak's (1988) foundational critique of the "white savior" logic, a queered solidarity approach would resist the impulse to speak for or assimilate subaltern voices into liberal rights frameworks. Instead, it would demand a radical reorientation of EU engagement toward listening to and aligning with struggles that are rendered unintelligible or dissonant within hegemonic epistemologies.

Spivak warns that the subaltern cannot speak in spaces where dominant knowledge systems predefine who counts as a subject and what counts as intelligible discourse. In this sense, queered solidarity must embrace epistemic humility by refusing to translate every claim into liberal, legible terms (as explored in previous subsections) and instead create space for forms of resistance, identity, and relation that defy assimilation. It would require the EU not to extend recognition *per se*, but to interrogate its own positionality, and to open up to coalitional politics rooted in opacity, refusal, and difference.

This would include standing not only with LGBT+ rights advocates but also with those marginalized within queer communities, namely sex workers, undocumented migrants, incarcerated individuals, and the economically disenfranchised which are also embedded in the idea of queer solidarity as people inevitably pushed to the margins (McDonald, 2015). As such, queering solidarity becomes not a performance of virtue but a commitment to structural transformation (Fraser, 2009).

One under-researched yet crucial framework in the EU's approach to solidarity-building is that of digital media, which has historically played a pivotal role in sustaining queer connections and activism globally (Shield, 2021). Queer migrants, in particular, have long leveraged digital culture and online platforms for visibility, community-building, and transnational mobilization (Bayramoğlu et al, 2024). Historical initiatives like *Khush List* (Roy, 2003), which was the first online discussion group for queer South Asians, illustrate how digital spaces have enabled diasporic and local LGBTQ communities to exchange knowledge, offer mutual support, and construct transnational queer publics beyond the constraints of national borders. For queer individuals in regions with limited LGBTQ visibility or protection, these networks provide vital access to information about queer

subcultures, legal rights, and activist organizations (Shield, 2021). While other policy fields such as peacebuilding, security, and development, have researched the role of diasporas in fostering dialogue and social change, similar kind of research into their role in promoting LGBTQ+ rights within queer diasporas remains very limited. Exploring this intersection could open an important and innovative avenue for EU engagement.

Other regional, more on the ground examples such as the case of the "Queeroslavija", a name referring to a network of queer festivals in former Yugoslav countries as a solution for local sexually diverse communities in the region to create a space of their own while reappropriating its own past; show how translocal, post-national solidarities are already discussed and offer alternative frameworks (Dioli, 2009; Binnie, 2016). In this way, in Southeast Europe, queer festivals and networks draw on anti-war feminist legacies, using regional identity as an emancipatory frame (Binnie, 2016). Technology-enabled decentralization could further strengthen these affective and political alliances (Eleftheriadis, 2014).

In sum, queering solidarity means unsettling assumptions about who deserves support and what forms solidarity should take. It demands that the EU not only listen but also transform its policies, institutions, and imaginaries in order to truly construct local and regional platforms with and by the queer communities it seeks to engage with and build policies at the European level instead of creating top-down alliances in its body of action.

Final Conclusion

This thesis began with a set of research questions that aimed to unsettle the dominant institutional narratives of the European Union's LGBT+ rights promotion. Drawing from Queer Theory, it posed two main questions: *How can queer thinking reframe the EU's role in advancing LGBT+ rights amid rising global anti-gender movements and democratic backsliding? And what, if any, alternative strategies could guide a more intersectional, decolonial, and solidaristic engagement?*

Through sustained critical inquiry, this project has revealed the deep tensions and contradictions inherent in the EU's current practices. The EU's self-presentation as a "normative power" and defender of LGBT+ rights is not without material significance; its frameworks and strategies have tangibly supported LGBT+ communities across hostile political environments. The EU has indeed positioned itself as a global leader in LGBT+ rights, embedding this agenda within its foreign policy tools, funding mechanisms, and diplomatic discourse. Through instruments such as the LGBTIQ Equality Strategy (2020–2025), the EU Action Plan on Human Rights and Democracy (2020–2024), and the Guidelines to Promote and Protect the Enjoyment of All Human Rights by LGBTI Persons, the EU has systematized the inclusion of sexual orientation and gender identity in its internal and external action. These commitments have provided crucial support for many activists and civil society actors, particularly in contexts where legal protections are absent or hostility is entrenched.

Yet, this promotion remains tied to liberal, securitized, technocratic and Eurocentric rationalities that frequently reduce queer lives to instruments of geopolitical distinction, moral capital, or development benchmarks. The empirical and conceptual investigations carried out in this thesis demonstrate how the EU's approach is entangled with hierarchies of race, gender, sexuality, and temporality. The discursive elevation of LGBT+ rights to symbols of European modernity sustains a civilizational binary that marks others, particularly from Eastern Europe, the Global South, and migrant communities, as sexually regressive, culturally immature, or in need of tutelage. These dynamics are further amplified in the context of militarization and securitization, where queer subjects can be mobilized to justify sovereignty, bordering practices, or foreign intervention. In such frameworks, queerness is not merely represented, it is conscripted. The very language of "promotion" implies a

one-way transmission of values, knowledge, and norms, often flattening the rich plurality of queer life and struggle beyond Europe's borders.

Queer theory, as taken up throughout this thesis, has served as both an analytical lens and a political compass. It has illuminated how the EU's external action is haunted by the very logics it seeks to oppose in paper: logics of homonationalism, conditionality, and legibility. In response to the first research question, then, this thesis argues that queer theory helps illuminate not only the exclusions and contradictions of EU LGBT+ rights promotion, but also reveals how sexual politics are deeply co-constitutive of broader geopolitical formations. Through queer critique, we see that sexuality is not a discrete variable in international relations, but a key axis through which sovereignty, legitimacy, and security are made thinkable. The union of these axes is paramount in order to understand the intricacies but also the multiple dimensions that European policy-making has to consider in order to advance rights in a more holistic way.

To the second research question regarding alternative strategies, this thesis has proposed not a blueprint, but a reorientation of political sensibility. A queered EU engagement would require the abandonment of civilizational arrogance and epistemic certainty. It would entail not merely "mainstreaming" LGBT+ concerns into foreign policy, but rethinking foreign policy itself: its logics, its institutions, its temporality. It entails moving from normative export to mutual engagement, from epistemic authority to humility, from rights-based inclusion to a restructure of institutional frameworks, building new common platforms and practicing more regional and diverse forms of solidarity. In doing so, queering invites the EU to relinquish its self-appointed role as global tutor and instead cultivate reciprocal, messy, and politically generative alliances, where queer global actors are co-constitutors of knowledge and policy, not merely recipients of European aid or targets of European values

Still, the question remains: is queering the EU's LGBT+ rights promotion possible; or is it necessarily a contradiction in terms? Can a state-like actor embedded in liberal legalism, securitized borders, and market imperatives meaningfully queer its foreign policy, or is queering always destined to exceed and unsettle such frameworks? This thesis does not claim to offer a definitive answer, but rather proposes that the (im)possibility of queering is precisely what must be held open. While some recommendations have been suggested and rethought in section 4.3; it is important to highlight that the value of queering lies not in its

finality but in its provocation, its capacity to disturb the comfort of settled meanings, and its insistence on staying with the trouble.

While this research has offered a critical, desk-based interrogation of the EU's institutional apparatus through a queer theoretical lens, its scope has necessarily still remained top-down in orientation since it has mainly relied on academic sources. A more grounded, bottom-up approach, one that engages directly with queer collectives in the countries examined, would add vital perspectives and nuance to this analysis, as well as a deeper research on alternative modes of European governance beyond liberalism. Such a follow-up would not only deepen the critique but also embody the very ethic of relationality and situated knowledge that queer theory demands.

In holding space for ambivalence, contradiction, and unfinished struggle, this thesis concludes by reaffirming queering not as a solution to policy gaps, but as a persistent challenge to the very terms on which LGBT+ rights are imagined, mobilized, and governed, specially in the current times of democratic erosion, rise of far-right and anti-gender movement actors and war.

If the EU is to take its commitments seriously not merely to equality but to justice, to plurality, to decolonial responsibility it must learn not only to speak, but to listen. Not only to promote, but to be transformed.

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