



GENDER IDEOLOGY AND THE ISTANBUL CONVENTION IN BULGARIA

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Abstract

Since 2012 Europe has witnessed the emergence of powerful anti-gender movements that have mobilised against the conceptualisation of gender as a social construct. The term “gender ideology” has been coined by anti-gender activists who understand ‘gender’ as a threat to traditional conservative and religious values. “Gender ideology” discourse has been employed in order to oppose gender related policy initiatives and legislature that include a social constructivism definition of gender. Transnational legislation such as the Istanbul Convention, have embedded conceptualisations of gender as a social construct in order to establish the structural connections between violence against women and gender inequality. This study analyses Bulgaria’s refusal to ratify the Istanbul Convention by analysing how and why the gender norm embedded within the Convention was contested by key actors in the country. The research is guided by norm circulation theory in order to examine the multiple processes by which norms are translated and the resistance and feedback provided by local actors. It also employed two interpretative frameworks taken from existing analysis of anti-gender movements, “gender ideology” as discourse and “gender ideology” as strategy. The empirical data used is drawn from one semi-structured interview and four strategically sampled text produced by the anti-gender campaign in Bulgaria and progressive actors in support of the Convention. The circulation of the gender norm in the Istanbul Convention is captured using qualitative frame analysis. Two master frames were devised, the first captured the framing of gender in the Istanbul Convention by the anti-gender campaign and the second captured the attempts of progressive actors to reclaim the framing of gender in the Convention. The analysis found evidence of “gender ideology” as discourse as the actions Bulgarian anti-gender campaign echoed those of other anti-movements in Europe. The use of “gender ideology” as strategy by Bulgarian politicians, conservative civil society and the Bulgarian Orthodox Church was also identified. However, the operationalisation of norm circulation made plain that previous poor translations and adoptions of gender equality norms was partly responsible for the speed at which the Bulgarian anti-gender sentiment mobilised. This study notes the emergence of “gender ideology” as a competing, would-be norm that hinders the adoption and translation of gender equality norms in Bulgaria.

Key Words: gender ideology, norm circulation, anti-gender, Istanbul Convention, gender equality norm

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List of abbreviations 1

BSP- Bulgarian Socialist Party

CEDAW- Convention on the Elimination of All Forms of Discrimination Against Women

GERB- Citizens for European Development of Bulgaria

NGO- Non-government Organisation

SVA- Society and Values Association

UN- United Nations

UNHCR- United Nations High Commissioner for Refugees

VMRO- Bulgarian National Movement

WHO- World Health Organisation

1. Introduction

1.1 Anti-gender campaigns and “gender ideology”

In recent years, several European countries have witnessed the emergence of powerful social movements that have mobilised against the term ‘gender’ and its centrality in issues such as same-sex marriage, reproductive rights, gender-sensitive education in schools, progressive sexual education in schools as well as gender related transnational and national legislature (Kovats 2017; Kuhar & Paternotte 2015; Poim & Tanczos 2015). These anti-gender campaigns have been active across France, Spain, Croatia, Slovenia, Austria, Germany, Poland, Slovakia and Italy. In France, *La Manif pour tous* brought thousands of people to the streets on the 17 November 2012 in a massive, grassroots campaign protesting same-sex marriage. Around the same time in Croatia, a civil initiative, *Citizens Voting Against* was formed, which called for a ban on constitutional same-sex marriage; a year later, the ban was adopted. In Spain, an anti-gender campaign was triggered by a 2010 law decriminalising abortion, this was then subject to aggressive opposition from the Church, pro-life groups and conservative political parties. In 2012, the Spanish government approved a draft banning abortion. The bill was later withdrawn due to lack of consensus but in the wake of this decision, an estimated 60,000 citizens staged a public protest in Madrid (Grzebalska and Soos 2016). It has been noted by academics that these anti-gender movements and campaigns share discourses, strategies and modes of action across borders; they observe what each other is doing, becoming increasingly connected transnationally (Hodzic and Bijelic 2014). This can be seen in the rise of similar movements across Central and Eastern Europe. In Poland, the anti-gender “outbreak” began in 2012 and was the result of three triggers; the Istanbul Convention on Preventing and Combatting Violence against women, the World Health Organisation’s (WHO) recommendations concerning sexual education in schools and a paedophilia scandal in the Polish Church (Grzebalska and Soós, 2016). The contestation surrounding gender and the Istanbul Convention will be discussed in greater depth later in this introduction. The momentum gained by the anti-gender movement in Poland is exemplified by the fact that ‘gender’ was chosen as the Polish word of the year in 2013 (Grzebalska and Soós, 2016). In Slovakia, anti-gender campaigns were also catalysed in resistance to gender related policy initiatives and legislature. Two EU documents- “*Gender Equality Strategy 2014-2017*” and “*The National Strategy for Human Rights Protection and Promotion*”-prompted opposition from the Church and gave way to the formation of a civil movement called *Alliance for the Family*. *Alliance for the Family* was established in order to fight against perceived threats to the traditional family model (Grzebalska and Soos 2016). As a result, in 2014, an amendment to the constitution was introduced which banned same-sex marriage. In Russia, the LGBTQ+ Propaganda Law was signed in 2013. The law aimed to protect minors from exposure to “the propaganda of non-traditional sexual relations”

and in its wake, legislators in Belarus, Moldova, Kazakhstan, Kyrgyzstan and Ukraine have lobbied to introduce similar laws (Grzebalska and Soós 2016, p 11). Mostly recently in February 2018 the Bulgarian government failed to ratify the Istanbul Convention. Conservative civil organisations, the Bulgarian Orthodox Church and nationalist politicians denounced the Convention's conceptualisation of gender as a social construct which led to a contentious public debate.

Central to the mobilisation of the anti-gender movement is the concept of 'gender' as an ideology. Referred to as "gender theory", "genderism" or "gender ideology", all three terms pay homage to a common enemy; the notion that gender is a threat to the "traditional family" and "natural masculinity and femininity" (Kuhar & Zobec 2017). The central objective of the so-called "gender ideology" is cultural revolution that will be achieved with the birth of a post-binary gender world (Kuhar & Zobec 2017). The anti-gender movement has understood "gender ideology" not only as a threat, but as a path to a dystopian future where natural, biological sexual differences between men and women will be eradicated when 'gender' is understood purely as a social construction or life choice (Mayer & Sauer 2017). This "feminisation of society" represents "the end of male virtues in Europe, the destruction of families and the resulting demographic decline join hands with the destruction of Christianity as the basis of Western civilisation as well as economic destruction" (Mayer & Sauer 2017). This dramatization is central to the conceptualisation of "gender ideology"; its meaning is slippery, stretched and all-consuming; it fuels the impression that 'gender' is a conspiracy theory, a Trojan horse with a hidden agenda (Grzebalska 2016). As the previous text explored, "gender ideology" is an umbrella term which has mobilised anti-gender movements across Europe.

1.2 Istanbul Convention and gender equality norms

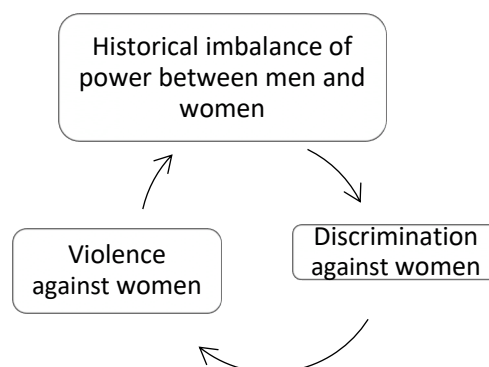
The anti-gender movement in Eastern and Central Europe is characterised by its rejection of gender within legislature; government gender policies or gender mainstreaming as an administrative policy tool. Here, the Istanbul Convention, has been a rallying point for anti-gender campaigns. The Istanbul Convention defines gender as a social construct, a conceptualisation which has converged anti-gender sentiment in Eastern and Central Europe and initiated anti-gender sentiment and fuelled the activism against "gender ideology". The following text will discuss the origins and purpose of the Istanbul Convention, its conceptualisation of gender as a social construct and the global gender equality norms embedded within its framework.

In 2014, the Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence, more commonly known as the Istanbul Convention, was introduced as a major human rights law. At the time of writing, the Convention has been ratified by 28 member

states¹ and signed, but not yet ratified by 17 states². The Istanbul Convention is Europe's first comprehensive, legally binding framework to focus exclusively on violence against women. Directly based on CEDAW (Convention on the Elimination of all forms of Discrimination Against Women) the Istanbul Convention combats violence against women through integrated policies. These policies target violence against women from three perspectives; prevention, prosecution and protection (Council of Europe 2011). Within its framework, the Istanbul Convention contains 81 provisions which impose comprehensive obligations on Member States. These minimum standards require members to co-operate with other states to eliminate violence globally, provide support and protection services to victims of violence against women and domestic violence, and effectively prosecute and rehabilitate perpetrators of violence (Council of Europe 2011). Perhaps most importantly, the Convention requires states to prevent violence against women and girls with the recognition that it is a result of gender inequality (Council of Europe 2011). The Istanbul Convention, then, is the first regional human rights law to establish structural connections between violence against women and gender inequality. The Convention states:

- Recognising that violence against women is a manifestation of historically unequal power relations between women and men, which have led to domination over, and discrimination against, women by men and to the prevention of the full advancement of women; (Council of Europe 2011)
- Recognising the structural nature of violence against women as gender-based violence, and that violence against women is one of the crucial social mechanisms by which women are forced into a subordinate position compared with men; (Council of Europe 2011)

By adopting this position, the Istanbul Convention is representative of a global gender equality norm; the Convention conceptualises violence against women as acts which perpetuate gender inequality and is the result of historical imbalance of power between men and women. A relationship that is perhaps best visualised:



¹ Member States which have ratified the Istanbul Convention: Albania, Andorra, Austria, Belgium, Bosnia & Herzegovina, Cyprus, Denmark, Estonia, Finland, France, Georgia, Germany, Italy, Malta, Monaco, Montenegro, Netherlands, Norway, Poland, Portugal, Romania, San Marino, Serbia, Slovenia, Spain, Sweden, Switzerland, Turkey.

² Signatories to the Istanbul Convention: Armenia, Bulgaria, Croatia, Czech Republic, Georgia, Greece, Hungary, Iceland, Ireland, Latvia, Liechtenstein, Lithuania, Luxembourg, Slovakia, Macedonia, Ukraine, United Kingdom.

To reinforce the structural connection that the Convention establishes between violence against women and gender inequality, the Convention text codifies what was previously soft law and case-based jurisprudence and gives legal definitions to critical concepts such as violence against women, domestic violence, victim, and gender. As outlined previously, the conceptualisation of 'gender' in the Istanbul Convention has been targeted by the anti-gender movement as a carrier of "gender ideology". This is because the Convention defines gender as, "socially constructed roles, behaviours and attributes that a given society considers appropriate for women and men" (Council of Europe 2011). In doing so, the Istanbul Convention is a site for a further gender equality norm; the suggestion that gender is not determined by biological differences between men and women. The Istanbul Convention's inclusion of gender equality norms within its framework has meant that the legislation is now ubiquitous with far-reaching societal change. Furthermore, given the current mobilisation of anti-gender sentiment across Europe, the global gender equality norms embedded within the Istanbul Convention have made the treaty a target for those campaigning against "gender ideology".

1.3 Problem Formulation

Having contextualised the emergence of a transnational, anti-gender movement in Europe and outlined the resistance to 'gender' and "gender ideology", this chapter will conclude with a discussion of the focus of this study, its problem formulation and research questions.

This study understands divergent and contrasting conceptualisations of gender to be the central source of contestation between progressive actors and those mobilised within the anti-gender movement. In order to further examine competing conceptualisations of gender, anti-gender campaigns and so-called "gender ideology" this study will reflect upon resistance and feedback to the gender norm embedded within the Istanbul Convention. More specifically, this study understands Bulgaria's refusal to ratify the Istanbul Convention in February 2018 as a national manifestation of a transnationally circulating movement against "gender ideology". By examining how key actors in Bulgaria reacted to the conceptualisation of gender as a social construct in the Istanbul Convention the research conducted will trace discursive contestation surrounding the document. This exploration into the reception of the gender norm in the Istanbul Convention and the rise of the anti-gender campaign as a counter narrative will be made explicit with the use of qualitative frame analysis. This analysis will draw upon strategically sampled empirical data produced by both supporters and opponents of the Istanbul Convention in Bulgaria. Examination of this data will be guided by the tenants of norm theory as well as the interpretative frameworks offered by

Kuhar and Paternotte (2017) in the analysis of anti-gender movements. Namely, the use of “gender ideology” as discourse which is transported transnationally by anti-gender activists, and the employment of “gender ideology” as strategy by religious and political actors. In this way, the central problem of this study is, “Why and how was the gender norm in the Istanbul Convention contested in Bulgaria?”

1.3.1 Research Questions

- 1.) How did participants in Bulgaria’s anti-gender campaign utilise “gender ideology” as discourse?
- 2.) To what extent can Bulgaria’s refusal to ratify the Istanbul Convention be interpreted as using “gender ideology” as strategy?
- 3.) Can Bulgaria’s refusal to ratify the Istanbul Convention be understood as a rejection of the global gender equality norm embedded within the Convention, in favour of “gender ideology” as a competing norm?

2. Theoretical Framework

The purpose of this chapter is to outline existing anti-gender literature and emerging theoretical debates in the study of “gender ideology” as well as reflect upon relevant theories employed in the analysis of social movements and contested gender norms. To that end the following discussion incorporates its reviews of relevant literature and theory into one section. The chapter will begin with an exploration of the theoretical frameworks used in the analysis of social movements, before turning to consider the theoretical debate surrounding norm development, adoption and translation. From here, the chapter will review existing research of anti-gender movements in Europe and consider the emergence of theoretical frameworks in the analysis of “gender ideology”. The chapter will then conclude by outlining the theoretical concepts that guide this research and the motivations behind these choices.

2.1 Social Movement Theory

Social movements have long been a stimulus for academic debate, studies have wrestled with the central components of movements for decades in order to examine how and why people are mobilised into collective activism. Staggenborg offers the following definition of social movements as, “sustained attempts by people with common goals and bonds of solidarity to bring about change through collective action targets at government authorities or other opponents” (Staggenborg 1998,

4). However, in today's globalised world transformations in transportation and communication technology have altered our sense of distance and time which has led to revisions by those conceptualising social movements. Here, Guidry, Kennedy and Zald broaden the most basic conceptualisation of social movements by describing them simply as “ideologically structure action” (Guidry, Kennedy and Zald 2000, p 11). As acknowledged, the spread of anti-gender campaigns in Europe has been considered a transnational movement. It is, therefore, necessary to further engage with the conceptual tools offered by social movement theorists and discuss the strengths and limitations of these frameworks.

Beyond defining the composition of social movements, research has further engaged with the contexts in which social movements arise and sought to examine what instigates social movements. Here we return to Zald, who seeks to contextualise analysis of social movements in a globalised world with the use of “political opportunity structures” (Guidry, Kennedy and Zald 2000, p 11). He states, “political opportunity structure is the way that present allocations of resources and power privilege some alternatives for collective action while raising the costs of other” (Guidry, Kennedy and Zald 2000, p 11). In doing so, Zald aligns his analysis to a particular theory within the study of social movements: Resource Mobilisation Theory. Resource Mobilisation theory emphasises the organisational structures and tangible resources required for movements to emerge and to succeed (Kuumba 2001). Users of resource mobilisation theory counter the notion that social movements are fundamentally psychologically driven in their response to societal disruption or change (Kuumba 2001). Indeed, where this theory prioritises pragmatism and the critical examination of resources in understanding social movements, other theorists withdrawn in order to take a more thematic approach to movements. To this end, Kretschmer and Meyer state simply, “social movements form in response to cleavages in society” and, “gender is a fundamental cleavage in all societies that we know about that divides us at the individual, organisation and political level” (Kretschmer & Meyer 2013, p 406). Kretschmer and Meyer categorise research of gender and social movements into two strands which frequently overlap; “individuals make choices based on the gendered environment, and the environment around movements sometimes shift because individual activists are working to change its gendered nature” (Kretschmer & Meyer 2013, p 393). This dualism has been captured by two further strands of conceptualisation within New Social Movement theory; collective identities and collective action frames.

The concept of collective identity allows for the multi-layered analysis of social movements. Nancy Whittier compares social movements to states where the composition of a movement is not uniform but made up of specific organisations, ideologies, campaigns, factions and individuals (Whittier

2002). Though movements are formed by several distinct elements, Whittier argues that collective identity acts as an adhesive, binding movement participants in collective activism. She states, “collective identity emerges from interaction within movement contexts as participants transform their sense of themselves” (Whittier 2002, p 302). Belinda Robnett introduces a relation approach with the conceptualisation of “cultural capital” (Robnett 2002). According to Robnett, “collective identity is made up of shared “cultural capital” that members acquire through the deployment of knowledge within the movement and use to constitute themselves in their own terms” (Robnett 2002, p 267). Robnett further cites the importance resources, political opportunity and organisational strength as key factors that shape internal identity, adding, “external events and institutions directly affect how participants see their position, the possibilities and limits of change, and the dilemmas they face” (Robnett 2002). As result, internal attempts to confront such external factors, change the movements collective identity. In this way, Robnett’s theorising of cultural capital and collective identity highlights an inherent equilibrium in social movements; movement identities are formed and reformed by internal and external dynamics. Both academics maintain that due to diversity within the composition of movement participants, analysts of social movements must seek a common identity that binds actors together.

In this way proponents of collective identities take a contrasting stance to users of collective action frames. Where collective identity is used as a connective thread to take a multi-layered perspective of social movements, collective action frames have been used by social theorists to collate the ideologies, symbols, meanings and myths that captured by a social movement. The genesis of collective frames is outlined by Rhys Williams, “An irony of social movements is that to achieve their aims of social change, movements must produce rhetorical packages that explain their claims within extant, culturally legitimate boundaries” (Williams 2002, p 247). Users of collective action frames ground their investigation of social movements in the discovery and exploration of these rhetorical packages. Scholars, Rhys Williams and Karen Beckwith have utilised collective action frames in order to theorise how and why two movements, made distinctive by their relationship with religion and gender, achieved their goals.

In his examination of the 1960s civil rights movement and the 1980s New Right movement, Rhys Williams operationalised collective action frames in order to demonstrate how each movement used religion in order to mobilise and legitimise their protest. Williams conceptualised the existence of two frames, “beloved community” within the Civil Rights movement, and “family values” within the New Right movement (Williams 2002, p 248). He further interrogated the each movements operationalisation of their religious frames and argues that religion is drawn upon by movements as

a “cultural resource” (Williams 2002, p 248). He states, “because religious language is both legitimate and democratically available almost any group...can use religious symbols, metaphors, and authority to legitimate its public claims” (Williams 2002, p 251). Where the Civil Rights use of “beloved community” was committed to the opening of the cultural space for more widespread participation in society; “family values” was meant to close interpretive space by establishing some social options as outside the pale of legitimate values (Williams 2002, p 248). While both movements drew upon the same central theme, religion, their framing mobilised activism in distinctly different parts of society. Easy to consider here is the pervasiveness of gender within today’s world where it’s conceptualisation is contested across the globe. Where some actors work to integrate an exclusive definition of gender as a social construct, others draw upon biological distinctions between genders in order to maintain and promote an essentialist understanding.

Beckwith extends the concept of collective action frames in her investigation of the Pittston Coal Strike. The Pittston Coal strike subverted the violent stereotype assigned to miners on strike when employees took industrial action by holding mass sit ins at mine gates and entrances. Beckwith deployed gender frames in order to theorising how male leadership of the United Mine Workers of America turned to nonviolent protest. She defines these as a set of cognitive understanding and widely shared symbols, noting, “a gender frame connotes both generalised and movement-specific understandings of difference embedded in conceptions of “women” and “men”, and in “masculinities” and “femininities”” (Beckwith 2001). Beckwith’s use of gender frames enabled her to conclude that the leaders of the Pittston Coal strike recognised that the negative stereotyping attached to striking miners was limiting the effectiveness of the strike (Beckwith 2001). As a result, the leadership moved to translate inherent union masculinities, as cognitive understandings between miners, into a collective frame that supported new forms of nonviolent protest (Beckwith 2001). In theoretical framework similar to that of Williams, Beckwith effectively demonstrates how gender is a common source or “cognitive understanding”. Moreover, her research demonstrates that the framing of gender is a collective action tool, both utilised by movements and integral to the analysis of movements.

The emergence of collective identities could be brought to bear in the examination of “gender ideology” in Bulgaria. The discourse surrounding “gender ideology” could be considered as a cross-cutting thread of commonality which binds actors from all levels of society; a collective identity. However, the use of social movement theory in this study is not without limitation. The anti-gender campaign in Bulgaria is not a sustained movement; consider here the speed at which public debate surrounding the convention soured in the last six months. Moreover, to take inspiration from Zald’s

definition of social movements as “ideologically structured action” would mean engaging in Resource Mobilisation theory and subsequently, a sustained examination of the resources used by participants in the anti-gender movement. This study lacks both the proximity to leading figures within the anti-gender movement in Bulgaria, and the resources required to conduct such analysis. In order to delimit this study, steps have been taken to refine the research conduct. Namely, to delineate from anti-gender campaigns across Europe, to a specific case in Bulgaria, and then further to the rejection of a specific policy; the Istanbul Convention. In this way, the centrality of the legislature and its role in the theoretical construction of this research cannot be ignored. Here, social movement theory falls short, extensive and informed social movement studies excel due to in-depth engagement within the movement and reflection upon the external environment. However, there is much to be derived from the methodological frameworks used by social movement analysts. While this necessitates further discussion in the following methodology chapter, this research will, taking inspiration from Williams and Beckwith, deploy qualitative frame analysis in its assessment of Bulgaria’s refusal to ratify the Istanbul Convention.

2.2 Theorising Gender Equality Norms

Building upon the previous conclusion that a central component of this study is the Istanbul Convention and its conceptualisation of gender, this chapter will turn to a discussion of gender equality norms. As acknowledged by Susanne Zwingel in her pivotal text, *Translating International Women’s Rights: The CEDAW Convention in Context*, “strengthening connections that promote gender equality is a multi-layered endeavour” (Zwingel 2016, p 3). Zwingel grounds this statement in the understanding that the idea that women should have the same rights as men has long been internationally recognised; it is a global norm (Zwingel 2016). Through in-depth analysis of the CEDAW Convention, Zwingel questions whether the concept of gender equality as a norm has made a difference for the world’s women. She is not the first to consider the impact of norms in legislature through critical analysis of both their conceptualisation and adoption. Early examinations of norms led to the emergence of ‘norm diffusion’ as a theoretical basis for understanding the dynamics of global norm creation and its subsequent diffusion into domestic contexts (Zwingel 2016). A primary focus on lead actor constellations and factors which support or hinder the diffusion process is inherent in this theoretical framework, and consequently, norm diffusion literature has been criticised for making “trickle-down assumptions” (Zwingel 2016, p 11). Norm diffusion takes the position that global norms are fixed and unequivocal once they have been globally agreed upon. In doing so, this theoretical framework undermines context-specific complexities that effect the translation of the norm (Zwingel 2016). As a result, norm diffusion has fallen prey to further, well-articulated criticism, as Zwingel outlines, “one recurring trope is the assumption of a norm-abiding

international community of (liberal) states and a number of deviant (authoritarian) states that need to be socialised into desirable behaviour” (Zwingel 2016, p 18). It is easy to distinguish the imperialistic undertones that this critique targets. More recently, order to further theoretical understandings of global norms, academics have extended norm theory in order to recognise the dynamism within their translation, interpretation and contestation across transnational, national and local adoption. The following text will discuss the use of norm theory in three studies and reflect upon the limitations of this theory.

The tendency for norm diffusion to understand norms as liberal-originated, gold standard behaviour which deviant countries must adhere to, has been a point of concern for academics because this perspective alienates norm agents (those who promote the norm in question). As a result, academics such as Amitav Acharya have worked to extend norm theory in order to accommodate the dynamism of norm interpretation, adoption and potential contestation. Acharya reacts against early norm diffusion literature, which she argues has been co-opted by a distinct “moral cosmopolitanism” whereby ‘good’ global norms, promoted by mainly Western-based norm entrepreneurs displace ‘bad’ local ideas (Acharya 2013). As a result of this, Acharya hypothesises that receptivity to a new norm is higher if the responsibility for both its creation and diffusion is seen to be shared across actors and is not credited to any single group (Acharya 2013). In order to test this hypothesis Acharya assessed the case of R2P (Responsibility to Protect) and in doing so, she reformulates theoretical approaches to understand why and how norms emerge (Acharya 2013). Central to Acharya’s new framework is the notion that norms are rarely adopted ‘wholesale’ rather, they are localised; “translated to fit the context and need of the norm-takers” (Acharya 2013). Norm creation and diffusion, then, is a two-way process. Acharya outlines this, noting, “global norms offered by transnational moral actors are contested and localised to fit the cognitive priors of local actors...while this local feedback is repatriated back to the wider global contest along with other locally constructed norms” (Acharya 2013). Here, Acharya introduces the concept of “norm circulation”, which occurs when less powerful actors are marginalised in the norm creation process. She further breaks down norm circulation with four dimensions; sources, contexts, agents and contestations and feedback. To summarise: (1) sources, norms originate from a variety of sources, a complexity of actors, issues and contexts; (2) contexts, subverts the assumption that regions adopt norms, maintaining that norms can adopt regions; (3) agents, attention must be given to how norms originate and how they diffusion, highlights that agency can outline in who and how the norm is promoted and underlines the suggestion that norms cannot be understood solely as the prerogative of powerful states; and (4) contestations and feedback: resistance that leads to the redefinition, contextualisation and localisation of a norm is a form of agency (Acharya 2013, p 470). Through

conceptualisation of norm diffusion, Acharya broadens the scope of normative agency. She bases her theoretical reformulation in resistance, feedback and repatriation, to demonstrate the comparative agency of norm entrepreneurs and recipient states. Such theoretical framework is essential in research conducted in the Europe's current anti-gender climate. On a basic level, actors within the anti-gender movement and proponents of "gender ideology" are agents of resistance against the global gender equality norm that is defined in the Istanbul Convention. However, norm circulation is not the only theoretical reformulation of norm diffusion. Indeed, where Acharya prioritises the agency of norm entrepreneurs as both developers and testers of norms in order to reject 'moral cosmopolitanism' she neglects a commonality through all four of her dimensions; discourse. To that end, the following text will reflect upon Krook & True who further challenge norm diffusion with the integration of discourse analysis.

In concurrence with Acharya, Krook and True are critical of existing norm theory models which, in their opinion, are marked by a "crucial tension" that exists between the static conceptualisation of norm content, and the dynamism of norm adoption and implementation (Krook and True 2010). Pivoting about the notion that norms continue to evolve once they have emerged, Krook and True argue for a discursive approach in theorising and analysing the life cycles of international norms (Krook and True 2010). In this approach, discourse and diffusion are partners throughout the norm's development. As the pair state, "norms diffuse precisely because-rather than despite the fact that-they may encompass different meanings, fit in with a variety of contexts, and be subjected to framing by diverse actors" (Krook and True 2010). Elaborating on this, they introduce two sources of dynamism as the conceptual tools that work behind norm definition and development (Krook and True 2010). They categorise these two sources as 'internal' and 'external' dynamisms. Here the 'internal' dynamism is defined by internal debates between transnational activists and gender experts and the 'external' dynamism stems from changes in broader normative environments (Krook and True 2010). Krook and True's recognition of internal and external discourses demonstrates that the dynamism of norm adoption and development is a double-edged sword (Krook and True 2010). On the one hand, discussions promote the creation of a norm but it also increases the likelihood that norm advocates will lose control over their meanings, and how these new norms are implemented (Krook and True 2010). Such understandings have relevance for global gender equality norms whereby both 'gender' and 'equality' are highly contested concepts (Lombardo et al., 2009). That gender equality norms are contested internationally, transnationally and nationally, means that the norm development is bound to a legacy of debate, contestation and reformulation. Perhaps the greatest take away from Krook and True's analysis of norm development is the emphasis they give to

the constant confluence of internal and external discourses that continue to reconstitute the given meanings of a norm.

For all that Krook and True prioritise a discursive approach to the analysis of norm adoption and development, they themselves operationalise their theoretical framework quite narrowly; they draw upon discourse frame analysis in order to capture the EU's reconstitution of norm meanings in specific policy documents. While this theoretical framework is apt in the close study of norm development within institutions and their immediate external influences, less emphasis is placed upon broader external factors such as the transnational context. Here, Peggy Levitt has argued that contemporary life is more frequently defined by its ability to transcend and transform social boundaries. She states, "social movements mobilise constituencies around the globe around issues such as human rights, gender justice, and global warming" (Levitt 2015). Levitt notes that this has effected how global norms about women's rights are shaped. On the one hand, Levitt confirms prevailing understanding of norm development which explains how gender norms are constructed and negotiated in a specific place and time, and debated through local, regional, national and international laws (Levitt 2015). On the other hand, Levitt criticised this perspective as one which neglects how local levels of norm engagement are both historically situated and connected to other sites of social interaction (Levitt 2015). She states, "from this perspective, the world consists of multiple sets of dynamically overlapping and interacting transnational social fields that create and shape seemingly bordered and bounded structures, actors and processes" (Levitt 2015). In order to fully understand how gender is constituted, Levitt argues, analysts must take into account the dynamic overlap and interaction that occurs at the transnational level. In this way, we are able to examine why and how global discourses about gender are actually commuted locally, nationally, and regionally. Levitt's perspective introduces the concept of 'venularisation' to encompass the impact of global women's rights and how they are made understandable and useful in local contexts (Levitt 2015). While Levitt's approach is perhaps best applied as a theoretical lens rather than framework for research, she considers a level of analysis that is not so explicitly explored by the other scholars discussed in this chapter. It is a perspective that conceptualises the dynamism of norms on a horizontal plain by considering that transnationalism influences a swath of social arenas at any one time. Levitt's approach takes on a theoretical relevance in this study due to her acknowledgement that norms need not only be considered in linear terms (norm diffusion), as a two-way process (norm circulation) or even through internal and external dynamism (discursive approach), but through a transnational optic (Levitt 2015). When reflecting upon the topics under study in this project and the comparative focus on the Istanbul Convention, Levitt's theorising makes way for an assessment that considers the movement of anti-gender sentiment across Europe. One other merit of this theoretical

mechanism is that it can be more loosely applied, however, utilising a transnational optic requires not only a broader analysis but access to data in transnational context. This is a limitation for operationalisation in this study which must limit itself to the examination of a specific country, Bulgaria. While Levitt compelling argues for discussion of transnational influences, it is a perspective which will be reflected upon in the research conduct in this paper, rather than a framework which is applied.

2.3 Existing anti-gender research and theorising “gender ideology”

The following text will discuss existing analysis of “gender ideology” and anti-gender movements, before discussing how anti-gender mobilisation is theorised as a transnational phenomenon. It will then discuss the particularities of anti-gender discourse in Central and Eastern Europe examining the works of academics in this field and the early theoretical approaches used. It has been noted by Eszter Kovats that until very recently there has been very limited research on the anti-gender movements in Europe (Kovats 2017). This knowledge gap in academic attention is partly explained, argue Roman Kuhar and David Paternotte, by the premature assumption Europe was on an unstoppable path towards “full” gender equality and that opposition to this was foreign to the European experience (Kuhar & Paternotte 2017). In reality, the opposite is true as Grzebalska acknowledges, “progress...made in the field of gender equality has not only been rather stagnant and uneven, but also much shakier and easier to reverse than we had imagined” (Grzebalska 2016). As a result, there has been an urgency to the academic analysis of the anti-gender mobilisations across Europe. In their newly published book, *Anti-Gender Campaigns in Europe: Mobilising Against Equality*, editors Roman Kuhar and David Paternotte summarise the existing literature. Drawing on this text and others, the following will briefly summarise existing literature in the field of anti-gender movements in Europe.

Kuhar and Paternotte theorise that existing analysis of gender ideology can be categorised into three areas; gender ideology as discourse, gender ideology as strategy and gender ideology as a national phenomenon. To the first, Kuhar and Paternotte note that studies of gender ideology discourse have highlighted the discursive attacks directed at academics themselves. In doing so, “erasing fierce controversies within gender and sexuality studies and the complex interplay between activism and the academy” (Kuhar & Paternotte 2017, p 5). Core conclusions drawn by research in this area centralise the fear that “gender ideology” is alien intervention, an ideological matrix of a set of abhorred ethical and social reforms (Kuhar & Paternotte 2017, p5). To that end, anti-gender campaigns have been shown to position themselves as projects of “alternative knowledge production” which aim to dismantle the tenants of gender ideology which is often presented as a new leftist

ideology and reject the deviant genderisms espoused by ivory towered elites (Kuhar & Paternotte 2017, p6). The suggestion that gender ideology is the discourse of corrupt elites has been highlighted as a factor in the mobilisation of anti-gender movements (Mayer & Sauer 2017). As Kuhar and Paternotte conclude, “(elites) and international institutions, be it either Europe or the United Nations, are a key vehicle of “gender ideology”, undermining the principles of national sovereignty and democratic deliberations (Kuhar & Paternotte 2017, p7). The second area of study has been closely linked to the role played by Catholicism and “populist fatigue” (Kuhar & Paternotte 2017). Repeated exploratory analysis made by many academics regarding the origins of “gender ideology” has traced its emergence to the Vatican. More specifically, to the development of a counter-narrative formed after the 1994 UN conference on Population and Development in Cairo and the 1995 Beijing Conference on Women. It is here that gender entered the UN discourse, and was understood by the Holy See as a strategic means to attack and destabilise the family (Kuhar & Paternotte 2017). Further study has focused on the influences of religion and the Roman Catholic Church in the mobilisation, direction and sustaining of anti-gender movements in Europe. Other academics have turned to analyse the political opportunity space and in doing so partner the rise of anti-gender movements with the current wave of right-wing populism in Europe (Kuhar & Paternotte 2017).

Scholarly theorising and analysis of national anti-gender campaigns have identified the similarities between movements. As Grzebalska highlights “gender ideology” has become a borderless, multi-purpose enemy which draws upon the same philosophical foundations (Grzebalska 2016). She clarifies these as, “the social teachings of the Roman Catholic Church, invoke identical, hyperbolic and fear-arousing discursive figures and operate through similar means of action” (Grzebalska 2016). As these movements share discourse and strategies, as well as modes of action they are increasingly connected transnationally (Kuhar & Paternotte 2017). In Central and Eastern Europe, the movement against gender ideology has matured in countries such as Croatia, Poland, Slovakia and Slovenia. Writing in 2014, Roman Kuhar established connections between the Church and “satellite civil organisations” in both Slovenia and Croatia in order to agitate for their goals (Kuhar 2014). Namely, the non-recognition of gay marriage in Slovenia and the exclusion of non-heteronormative sex-education modules from Croatian public schools (Kuhar 2014). Even prior to this in 2013, anti-gender campaigns in Slovakia and Poland drew upon the Bishops’ Conference Pastoral letter on “gender ideology” as a resource with which to agitate against the ratification of the Istanbul Convention in Poland, and the adoption of a gender responsive human rights strategy in Slovakia (Kovats & Poim 2015). In the text, the bishops stated that the promoters of gender equality wish to promote the breakdown of family life and lead children to alternative forms of partnership (Kovats & Poim 2015).

On gender policy, the bishops took the position that such legislation gives way to the possibility to overcome biologically-determined gender through free choice (Kovats & Poim 2015). The bishops' stance was echoed by conservative actors and NGOs, as well right-wing politicians through Poland, Slovenia, Croatia and Bulgaria. It is on this basis that "gender ideology" is an enemy image in Europe that has been discussed transnationally (Kovats 2017).

Research and examination of anti-gender movement and "gender ideology" has offered interpretive frameworks through which to analyse the phenomenon; via national circumstances, as a strategy of religious actors, as a conservative backlash, or as a symbolic glue. Indeed, one could further reduce these frameworks into two areas. The first, "gender ideology" as discourse stresses the notion of gender as a common enemy and "empty signifier" (Mayer & Sauer 2017, p 23). The meaning of "gender ideology" is slippery, stretched and all-consuming, as an "empty signifier", "gender ideology" can represent everything and anything from marriage equality and sexual education to reproductive and adopted rights and abortion (Mayer & Sauer 2017). Further to this is the discursive approach which holds that gender, is "symbolic glue" as outlined by Kovats and Poim in their analysis of five case studies in France, Germany, Hungary, Poland, and Slovakia (Kovats & Poim 2015). In their comparative examination of the commonalities and divergences of anti-gender phenomenon in each country, gender acts as a "symbolic glue" by unifying different rightist traditions; anti-EU, anti-liberal, anti-communist, homophobic attitudes and privileges heterosexual marriages (Kovats & Poim 2015). The second area can be categorised as "gender ideology" as strategy, which emphasises religious actors and political actors on the right. This draws upon the unifying notion of gender as symbolic glue between national and transnational actors, but also argues that "gender ideology" is the strategic, long held counter-narrative and discursive device of the Vatican and Catholicism. Building upon that, gender as strategy also examines the fundamentalist and traditional values which overlap with popular conservative political discourse. Anti-gender campaigns in Europe have grown to prominence since 2012. Previous analysis and this chapter's discussion of studies conducted has highlighted interpretative frameworks used to examine anti-gender and "gender ideology". Made clear here are two elements at work in the development of anti-gender sentiment and "gender ideology"; gender as discourse and gender as strategy. However, there is no formalised theoretical mechanism for the conceptualisation and analysis of why and how anti-gender movements, campaigns and "gender ideology" rise, spread, succeed or fail. Indeed, the subjects under study in this research fall into a theoretical hinterland. Bulgaria's rejection of the Istanbul Convention could be categorised explored with the use of several theoretical frameworks; those used in by social movement theorists, through theoretical frameworks of global gender norms, or through the interpretative frameworks used in existing anti-gender and "gender ideology" literature. The

strengths and limitations of these existing theoretical bodies has been reflected upon throughout this chapter, however, this research must ground itself in theory and with the use of theoretical tools, attempt to understand why and how the Istanbul Convention was not ratified in Bulgaria. To that end, this chapter will conclude by outlining its theoretical considerations and the motivations behind them.

2.4 Theoretical choices of this study

Bulgaria's recent refusal to ratify the Istanbul Convention and the continuing contestation surrounding the gender norm conceptualised within the text, captures the dynamism of norms as they are debated from transnational legislation to national law. In order to capture this dynamism, uses Amitav Acharya's reformulation of norm theory: norm circulation. As discussed previously, Acharya's norm circulation is dependent upon four dimensions; sources, contexts, agents, and feedback and contestation (Acharya 2013). This study will employ these dimensions as conceptual tools in order to acknowledge, firstly, that the source of norms are diverse and involve a complex web of actors, issues and contexts (Acharya 2013). Secondly, to pay close attention to the context in which the norm is adopted and the norm agents involved, noting that regions can also adopt norms (Acharya 2013). Third, the research will consider how norms originate and diffuse and the agents active in this process. Exploration of this agency can outline in who and how the norm is promoted, furthering the suggestion that norms cannot be understood solely as the prerogative of powerful states (Acharya 2013). Finally, this study pays close attention to feedback and contestation of the norm, as Acharya states, "resistance that leads to redefinition, contextualisation and localisation of a norm is a form of agency" (Acharya 2013, p 470). It is important here to clarify the norm under analysis. Acharya's focus upon feedback and agency allows for an extension of her theoretical formulation in order to incorporate the competing, would-be norms that emerge during circulation. This study will operationalise this in the examination of the gender norm within the Istanbul Convention by capturing norm circulation in motion. This will be done by tracing the discourse of opposing norm agents as they contest the meaning of gender in the Convention, while also considering the emergence of "gender ideology" as a competing norm. Furthermore, in order to better interrogate the emergence of "gender ideology" a form of resistance to the gender norm embedded in the Istanbul Convention this study will also draw on the two interpretative frameworks offered by Kuhar and Paternotte (2017). Namely, the study of "gender ideology" as discourse, and the study of "gender ideology" as strategy (2017). These two frameworks will enable a comprehensive analysis of the anti-gender campaign in Bulgaria which also bolsters the theoretical dimensions outlined by Acharya. The use of both interpretative frameworks will further understanding of the ways in which the gender norm in the Istanbul Convention circulated in

Bulgaria through norm agents, their discourse and their actions and the subsequent reconstitution of the meaning of gender. In this way, this study advances on the understanding that the legacy of norm diffusion as a form of “moral cosmopolitanism” has corrupted the reception of newly developed norms. With the rise of anti-gender movements across Europe academics and progressive actors alike discovered that the efforts to achieve gender equality have adopted unevenly and are far more easily reversed than had first been imagined (Grzebalska 2016). This study advances with the hypothesis that as a result of the co-option of gender norms as “moral cosmopolitanism” and the subsequent poor translation of gender norms in Europe, the gender norm in the Istanbul Convention has been rejected. Furthermore, this study will operationalise Acharya’s theory of norm circulation with a view to extending the framework in order to better understand how the rise of competing, would-be norms, such as “gender ideology” have outpaced the diffusion of global gender norms.

3. Methodology

The following chapter will present the research design of this study, it will highlight how the research will be conducted, the methods used, the choice of data and subsequent data analysis. As David De Vaus outlines, “the function of a research design is to ensure that the evidence obtained enables us to answer the initial question as unambiguously as possible” (De Vaus 2001). With this in mind, this research is conducted deductively where the theoretical dimensions utilised in Acharya’s norm circulation theory, as well as the two interpretative frameworks offered by Kuhar and Patternote will be operationalised. Furthermore, the research conducted in this study takes inspiration from methodologies previously highlighted for use in social movement research.

3.1 Methods

On the premise posited by Klandermans and Staggenborg (2002), as well as Snow and Tron (2002), that methodological pluralism and a triangulation of methods is well suited to the analysis of movements this research is a case study of the broader transnational anti-gender movement in Europe. It will employ a semi-structured interview alongside textual materials which have been strategically sampled, the analysis of which will be captured through qualitative frame analysis. The textual materials selected for this study and the motivations behind these choices will be discussed in greater depth in the following section.

3.1.1 Case Study

The introduction to this research gave a contextual overview of anti-gender movements in Europe and the previous theoretical chapter outlined existing literature surrounding “gender ideology” discourse, both discussions have argued that anti-gender sentiment is fast becoming a borderless, divisive discourse. The reception and rejection of the Istanbul Convention in Bulgaria can be considered as a case study of this broader transnational anti-gender movement in Europe. Indeed, there are several merits to the undertaking of this methodological standpoint. Snow and Tron define case studies as, “empirical and analytical focus on an instance or variant of some more generic phenomena, a particular theoretical concept or process, or social event or happening that is interesting in its own right” (Snow and Tron 2002, p 149). As a second defining feature of case studies is their generation of richly detailed, “thick” elaboration of the phenomenon under study (Snow and Tron 2002). As case studies are a specific occurrence embedded within a specific context, they allow for a high level of focus and analysis on a distinct occasion while being highly relevant for discussion in relation to the broader phenomenon of which they are a part. In this way, the analysis of the Istanbul Convention in Bulgaria has a wider significance by contributing to the study of anti-gender campaigns in Europe and unlocking, as it were, new or similar ways “gender ideology” as discourse has developed in the Bulgarian national context.

3.1.2 Semi-structured interview

Semi-structured interviews will be employed as a further method in this research. The purpose of an interview is to elicit specific kinds of information and as a result, semi-structured interviews are a common method in the analysis of social movements (Blee and Taylor 2002). By this method, interviewers are able to comprehend movement mobilisation, relevant discourse, as well as understanding of the symbols and ideologies used, from the perspective of movement actors and audiences (Blee and Taylor 2002). Blee and Taylor further operationalise the centrality of semi-structured interviewing thus, “the open-ended nature of such interviewing strategies makes it possible for respondents to generate, challenge, clarify, elaborate or recontextualise understandings of social movements” (Blee & Taylor 2002). They go on, “semi-structure interviewing allows scholars to scrutinize the ways in which messages of social movements are *received* by members, targeted recruits, intended audiences and other” (Blee & Taylor 2002). On this basis, this study employs semi-structured interviewing as a coherent and fruitful method for the collection of data. A method which aligns itself not only with the theoretical propositions and investigating research question, but also with the qualitative frame analysis. While conducting initial research into this topic it became apparent that conducting semi-structured interviews with agents of the gender norm within the Istanbul Convention would further bolster the empirical analysis at hand. As promoters of the norm under study and advocates of the Istanbul Convention, the Bulgarian Fund for Women were approached for interview. As opponents to the gender norm in the Istanbul Convention the conservative civil organisation the Society and Values Association (SVA) was also invited to for interview. Initial communications with both organisations were conducted via email and from this first communication the Bulgarian Fund for Women agreed to be interviewed. Though great efforts were made to engage SVA in an interview, I visited their office in Bulgaria though no one answered and emailed several times, no interview could be arranged. While in Bulgaria, Gergana Kutseva, Director of Development and Communications at the Bulgarian Fund for Women participated in a semi-structured interview. It should be noted that Kutseva consented to the use of her name, job title and that of the Bulgarian Fund for Women throughout this paper. In order to ground the interview in recommendations made by social movement researchers, the semi-structured interview employed an interview guide as a framework (Blee and Taylor 2002; Staggenborg 2000; Johnston 2002). This interview guide consisted of a set of questions which drew upon the theoretical considerations outlined in the previous chapter and was further guided by conclusions drawn by existing literature on anti-gender movements in Europe. The interview guide is available in the appendix. As a tool this interview guide gave me the flexibility to digress and further query Kutseva’s responses while the interview was conducted. By using semi-structured interviews as a qualitative method the data will provide a greater breadth and depth of information through which the

interviewees experience can be explored (Blee and Taylor 2002). In her work at the Bulgarian Fund for Women, Kutseva is centrally situated within the circulation of the gender norm embedded in the Convention; she observed the source of the norm from the Council of Europe as well as witnessed the rise of the narrative against the ratification of the Convention. As such, Kutseva is a norm agent promoting the gender norm in the Istanbul Convention and invested in monitoring and observing the counter narrative which moves to discredit that norm. Moreover, the opportunity to conduct an interview with an agent working with the gender norm in the Istanbul Convention further corroborated the translations of the statement from the Bulgarian Holy Synod and the open letter to reject the Convention. Kutseva was able to review the translations while contextualising major events and themes in Bulgarian social, political and economic spheres. However, it is acknowledged that the analysis of these documents which have been translated from Bulgarian to English is subjective. In order to mitigate this as much as possible, the analysis of the open letter to reject the Istanbul Convention and the opinion of the Holy Synod is supported by relevant news articles and previous research. In this way the translation is cross-referenced and where possible, verified by external sources written in English. As a result, the data gathered by the semi-structure interview is operationalised through the empirical chapter in order to challenge, clarify and contextualise the debate and further refine how the given meaning of gender in the Istanbul Convention has been contested.

3.2 Data

In order to lay the groundwork for the accuracy of the analysis conducted in this study, and to give empirical weight to the observations made and conclusions drawn, the following text will outline the criteria and motivations behind the selection of data.

3.2.1 Text

The importance of texts selected in any study cannot be understated. It is also clear that the criteria for the selection of texts should be explicit to the reader, as well as an understanding of how the texts are produced and their relationship to the topics under analysis (Johnston 2002). In the interests of clarity a brief reminder here that this study, through qualitative frame analysis, seeks to examine the framing process of the gender norm within the Istanbul Convention, in Bulgaria. As a result, the data selected for analysis is chosen in order to capture the progress of events and not simply function as vehicles of information. With this in mind, it is perhaps helpful to envisage the choice of textual documents as circular, stemming from the source of the norm to its norm entrepreneurs, to its use by norm agents and returning to norm entrepreneurs.

The Istanbul Convention itself, *Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence*, is the foundation text in which the gender norm is embedded. It is the framing of original conceptualisation which will be captured in the analysis of four other texts. Further textual materials were strategically sampled in order to examine the two prime areas of discussion: (1) framing of the Istanbul Convention by advocates of the document and its gender norm; and (2) framing of the Istanbul Convention and its gender norm by the anti-gender campaign. Initially, a wide desk review was conducted in order to become familiar with the key actors in the debate surrounding gender and the Istanbul Convention. From there the following agents were identified as active agents in the debates surrounding the ratification of the Convention; the civil organisation Society and Values Association; the Holy Synod; the Bulgarian Fund for Women; Prime Minister Boyko Borisov; Minister of Defence and Deputy Prime Minister, Krasimir Karakachanov;; the Bulgarian Socialist Party (BSP); Citizens for European Development of Bulgaria (GERB); the United Patriots. The United Patriots is formed by a coalition of three political parties, Bulgarian National Movement (VMRO), the National Front for the Salvation of Bulgaria (NFSB) and Attack. Secondly, key documents which were produced and widely distributed by the agents were selected for empirical analysis. These include two open letters, one written in support of the Istanbul Convention by the Bulgarian Fund for Women and signed by an ad-hoc coalition of 200 NGOs and the second, an open letter written in opposition to the ratification of the Istanbul Convention by the Society and Values Association and signed by 30 NGOs. These documents were widely distributed within Bulgaria and received coverage by both the national and European press. The statement of the Holy Synod was also selected for analysis. Published originally on the website of the Bulgarian Orthodox Church, but also covered by the Bulgarian press, civil organisations and NGOs, in the statement the Holy Synod outlines its opposition to the ratification of the Istanbul Convention. The final text selected is an opinion piece written by Bridget O'Loughlin the executive secretary of the Istanbul Convention. The piece, titled "Istanbul Convention: Clearing away the fog of misconception", was published in the EU Observer. In the piece O'Loughlin attempts to combat the claims made by anti-gender campaigns in Europe against the Istanbul Convention. The texts chosen are milestone documents which have been widely distributed by those engaged with the debate surrounding the Istanbul Convention and the gender norm it introduces.

On the one hand, the two open letters are representative of the collective grievances of those both advocates and opponents of the Istanbul Convention. As each letter is signed by NGOs and civil organisations this sampling of data has followed the principle of similarity and dissimilarity. Each open letter has been chosen in order to examine how the interpretation of similarly situated actors with very different characteristics compare (Blee and Taylor 2002, p 100). This principle holds true

for opinion pieces published by the Holy Synod and the executive secretary of the Istanbul Convention. As the writers and signatories of all four texts are agents in the circulation of the gender norm within the Istanbul Convention it is imperative that the grievances of each party and the ways in which their discourse reconstitutes the given meaning of the gender norm combine to framing the Istanbul Convention.

3.3 Data Analysis

The following will clarify the specific guidelines used for the analysis of data. When conducting frame analysis Johnston suggests that users must not journey too far from the texts (Johnston 2002). Inherent in the analysis of a framing process is a continual, evidential dialogue with the texts selected and transcriptions produced from interviews. This study heeds Johnston's warning that while frames are often "discovered" through interviews, document analysis and so on, frame analysis must repeatedly observe what the frame means, in detail, to those who use it. As a result, this research operationalises the coding categories embedded within the data gathered in order to better reflect upon the theoretical mechanisms employed in this study. This will be done in three ways. Firstly, the formation of each frame will be guided by Acharya's four dimensions of norm circulation as outlined in the theoretical considerations of this research. Each of the selected text will be coded in order to identify the four dimensions; source, agents, context, and feedback and resistance (Acharya 2013, p 470). To further the exposition of these theoretical dimensions, the coding of the textual materials also took inspiration from Charlotte Ryan whose framing of movement discourse followed four general themes: (1) the key issue in the frame; (2) responsibility/solution proposed in the frame, or its diagnosis/prognosis; (3) the symbols used, especially visual images, metaphors, historical examples, stereotypes, and catch phrases; and (4) the supporting arguments, especially in terms of historical roots of the grievance (Ryan 1991). Following the coding of the textual data based on these themes, this study has chosen to present the framing of the Istanbul Convention by its advocates and opponents within a frame schemata. Two master frames will be devised, one in support of the Istanbul Convention and one as the anti-gender campaign in Bulgaria against the Istanbul Convention. This choice is motivated by Johnston's suggestion that frames have content, can be thought of as hierarchal structures that are both individual and social; "a frame is an individually held cognitive schema but is important in collective action only insofar as it is shared by enough individuals to channel their behaviours in shared and patterned ways" (Johnston 2002, p 66). The construction of a frame schema is a formalised method for presenting the different levels within a frame analysis and moreover, clarifies the textual basis of frame analysis (Johnston 2002). To make the analysis conducted explicit, each master frame drawn references the text and lines in which this framing is apparent. For example, D15 is in reference to Appendix D, line 15. As this qualitative frame

analysis draws from several texts rather than just one, the frame schema is a visual aid that demonstrates the hierarchical structure at work within each of the master frames.

Furthermore, in order to continually acknowledge the processes by which the Istanbul Convention has been framed, rather than simply discovering a frame, the empirical chapter of this study will begin with a timeline that outlines key events, publications and statements regarding the debate surrounding the Convention in Bulgaria. In this way, this study pays attention to what Johnston defines as the “linguist turn” in social movement methodologies. The concept is central in key texts that have been distributed widely as Johnston outlines, “intensive textual analysis must always balance its insights with the looming question of whether the text is representative enough to generalise about its patterns” (Johnston 2002). This “linguistic turn” pivots engaged, sustained analysis of a document to further consider the broader cultural ramifications of these documents as discourse that may be representative of a wider movement. In conducting this qualitative research, the study attempts to balance identifying the contested gender norm within the Istanbul Convention alongside the mobilisation of the anti-gender movement and “gender ideology”.

3.4 Role as researcher

This section will conclude with a brief discussion observing my role as a researcher. I must acknowledge that, as a student of global gender studies, my understanding and conceptualisation of gender is in line with that which is defined in the Istanbul Convention; gender is a social construct. Furthermore, in line with Ackerly and True (2010, p.27) I argue that “a feminist epistemology included the belief that knowledge (truth) is produced, not simply found, and that the conditions of its production should be studied, critiqued if necessary, and certainly made explicit and exposed.” In this social constructivist epistemology, no objective truth exists as any form of knowledge production is “a product not of objective observation of the world, but of the social processes and interactions in which people are constantly engaged” (Burr 2006, p 4). I acknowledge that this conceptualisation is at odds with those espoused within the ‘anti-gender’ movement that arose against the ratification of the Istanbul Convention. The interviewee taking part in this research also hold similar views and it is from this perspective they are witness to the framing process of the Istanbul Convention. However, I understand my position in this research to be that of an outsider. I am not Bulgarian, I have not participated in the anti-gender movement in Europe or in Bulgaria. In this way, I intend to capitalise on what may be taken-for-granted assumptions held by social movement participants and audiences.

4. Analysis

Up to this point, this study has given an overview of anti-gender campaigns in Europe and the spread of “gender” as an ideology. It has sought to further refine this research with an exploration of the gender equality norm embedded within the Istanbul Convention, which defines gender as a social construct in order to recognise the historical imbalance between societal expectations of men and women. Further investigation has understood Bulgaria’s refusal to ratify the Istanbul Convention, and the gender norm it espouses, in relation to the broader, transnational anti-gender movement. Drawing upon Acharya’s theoretical mechanisms used in norm circulation theory and operationalising the interpretative frameworks offered by Kuhar and Paternotte in the analysis of anti-gender movements, the following chapter closely examines the framing process of the Istanbul Convention by key agents in the debate. In order to better examine actions of key agents and the texts they published in the months prior to Bulgaria’s rejection of the Convention, this chapter includes three figures: (1) *Figure 1: Timeline of Key Events*; (2) *Figure 2: Master frame of Anti-Gender Campaign in Bulgaria against the Istanbul Convention*; and (3) *Figure 3: Master frame of Pro-ratification Campaign in Bulgaria*. *Figure 1* notes key events, publications and political statements published between April 2016 and May 2018 and will be referred through the chapter in order to contextualise the framing process at work. *Figure 2* and *Figure 3* will be examined separately with a sub-section each. This chapter will first explore the ways in which the anti-gender campaign reconstituted the meaning of gender in the Istanbul Convention by identifying particular narrative and rhetoric in two texts, “*Open Letter in Opposition of the Istanbul Convention*” and “*Opinion of the Holy Synod on the occasion of the Istanbul Convention*”. The second section of the chapter will examine the frame schemata drawn from two texts published by key agents in favour of the ratification of the Istanbul Convention. Namely, “*Open letter in support of the ratification of the Istanbul Convention*” and “*Istanbul Convention: Clearing away the fog of misconception*”. This second schemata notes the attempts of advocates of the gender equality norm to redirect the debate to understand the Convention as a legal framework for the eradication of violence against women. The chapter will with a reflection upon the circulation of the gender norm within the Istanbul Convention in Bulgaria and discuss the concept of “gender ideology” as a competing, secondary norm.


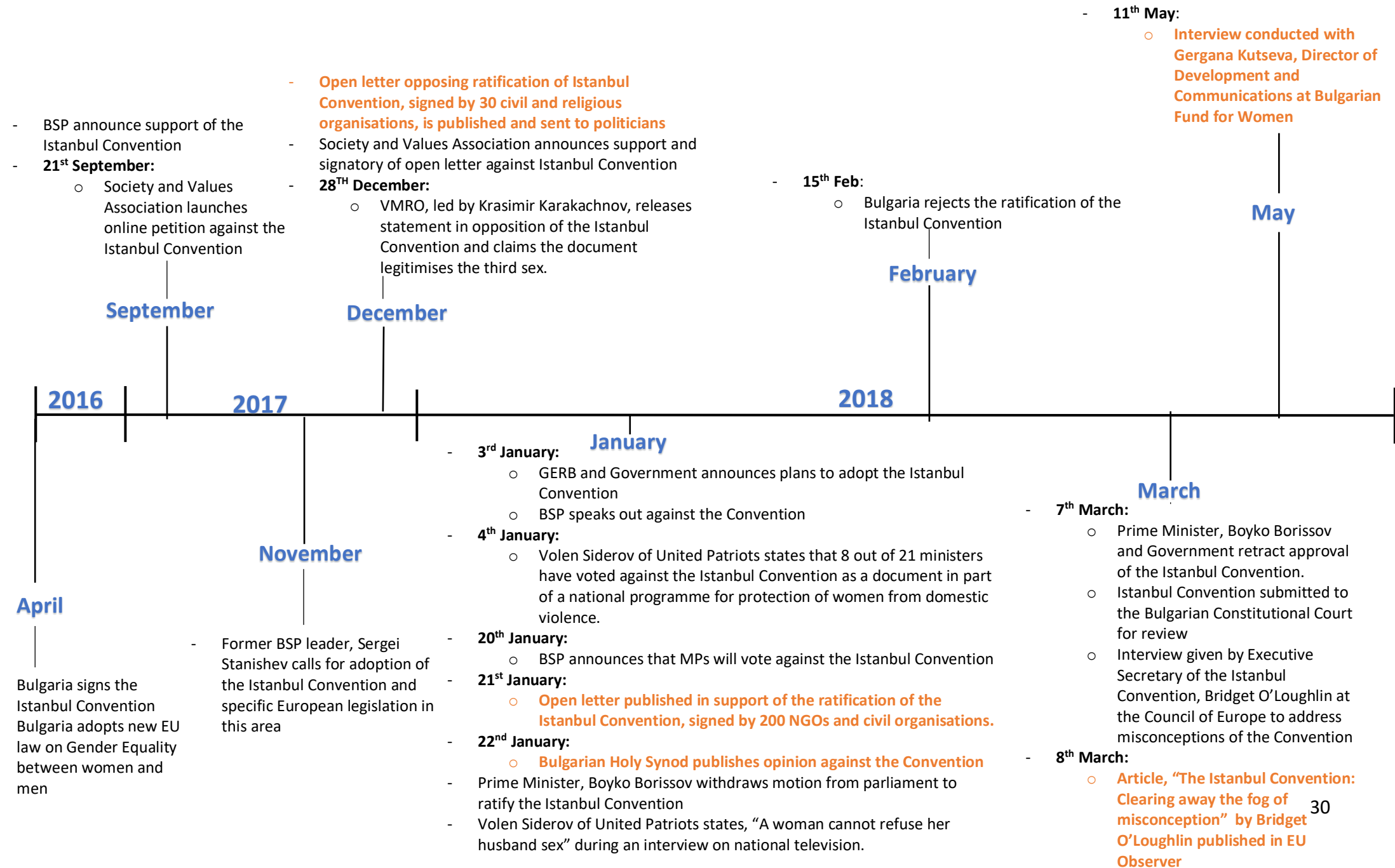
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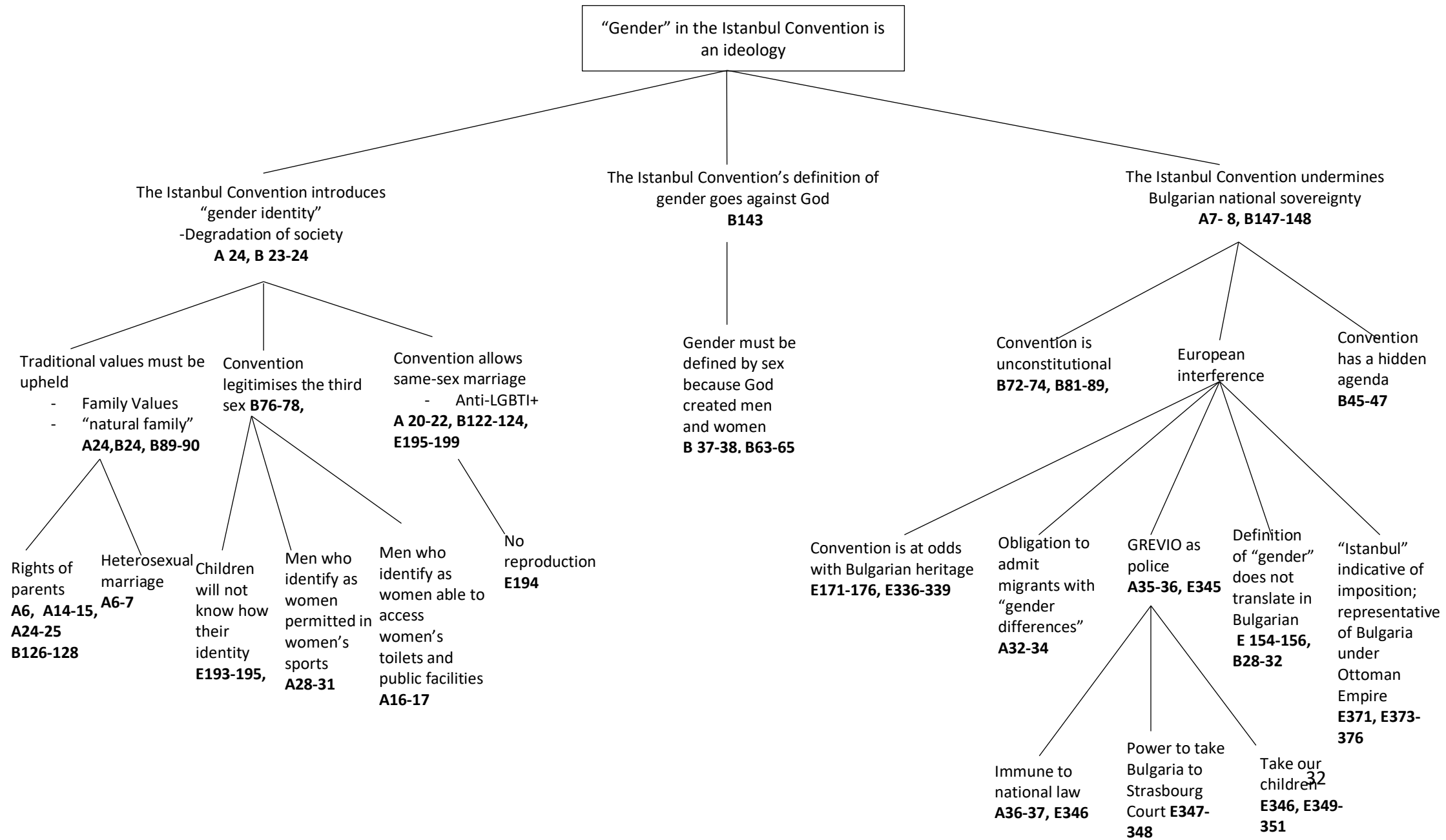
Figure 1: Timeline of Key Events



4.1 The Anti-Gender Campaign in Bulgaria

Figure 2 is a visual representation of the cognitive structure and hierarchical relationship between the various frames used by the anti-gender campaign in Bulgaria in order to lobby against the ratification of the Istanbul Convention. Based on the analysis of the two texts published and widely distributed by the Bulgarian Orthodox Church and a coalition of 30 NGOs and civil organisations, this study argues that the master frame of the anti-gender movement can be categorised as “‘gender’ within the Istanbul Convention is an ideology”. This master frame is compiled of three further sub-frames: (1) the Istanbul Convention undermines Bulgarian national sovereignty; (2) the Istanbul Convention’s definition of gender goes against God; and (3) the Istanbul Convention introduces “gender identity”. Inherent in this framing is the understanding of gender in the Istanbul Convention as an enemy. Consider here the Mayer & Sauer’s understanding of “gender ideology” as an empty signifier which can represent anything and everything from same-sex marriage, to family values, to invasive government gender mainstreaming policies (Mayer & Sauer 2017). The crux of which is seen in the grievances framed in *Figure 2*. The following text will examine each sub-frame in turn by identifying the symbols used, supporting arguments and the historical roots of grievances. With reference to *Figure 1* and Kuhar and Paternotte’s second interpretative framework, “gender ideology” as strategy, subsequent analysis will closely consider the context in which each frame emerged as well as the ways this process can be considered as a strategic.

Figure 2: Master frame of the anti-gender campaign in Bulgaria against the Istanbul Convention



4.1.1 “Gender Ideology” and Bulgarian national sovereignty

As the accompanying text to the master frame drawn in *Figure 2* this sub-section will proceed with a discussion of the Bulgarian anti-gender campaigns’ framing of the gender norm within the Istanbul Convention as legislature which undermines Bulgarian national sovereignty. It was suggested by Gergana Kutseva, Director of Development and Communications at the Bulgarian Fund for Women, during interview that the genesis of this framing began with Bulgarian attitudes towards the name of the Convention (Appendix E, 371). Bulgaria was previously ruled by the Ottoman Empire and declared independence from the Turks in 1908, the fact that the convention is known as the “Istanbul” convention meant the document was already a contentious text (Appendix E, 375-376). While this notion is not explicit in the statement from the Bulgarian Holy Synod or the open letter against the Istanbul Convention, it provides notable contextual understanding for the ways in which the convention has been received. This first frame, “the convention undermines Bulgarian national sovereignty”, is composed of several key issues, supporting arguments, historical grievances and symbols. The following text will begin with the largest reframing, the suggestion that the Istanbul Convention embodies European interference in the Bulgarian national context. The discussion will then turn to the active reframing of the convention as a document which is unconstitutional and conclude with the exploration the suggestion that the Istanbul Convention has a hidden agenda.

The perception that, if ratified, the Istanbul Convention would introduce external actors and legitimise interventionist laws and policies is made plan in the open letter published in opposition to the ratification. This contention is directed both at the content of the Istanbul Convention and the Convention’s monitoring body, the Groups of Experts on Action against Violence against Women and Domestic Violence (GREVIO). First, the letter states, “the Istanbul Convention will oblige Bulgaria to grant refugee status to any foreigner who is being persecuted in their homeland because of “gender specificities”” (Appendix A, 32-33). This grievance targets Article 60-Gender-based asylum claims within the Istanbul Convention which notes, “parties shall ensure that a gender-sensitive interpretation is given to each of the Convention grounds...where it is established that the persecution feared is for one or more of these grounds, applicants shall be granted refugee status” (Council of Europe, 2011). The implication made by the open letter is that Bulgarian capacity to control their own internal security will be compromised by the integration of a convention which prioritises the “gender specificities” of incoming migrants. Throughout the letter gender is referred to in terms of choice, the argument is made that if gender is not defined by biological characteristics then anyone may determine their own gender. In this way, the open letter reframes Article 60 with the suggestion that any migrant may ‘chose’ to have “gender specificities” and thus Bulgaria will be

obliged to grant them refugee status, should the country ratify the convention. Though the open letter was published in December 2017, it should be noted that like many other countries in Europe, Bulgaria is home to a number of Syrian refugees. Since 2013 an estimated 60,000 Syrian refugees have applied for asylum in Bulgaria (The Journal, 2018) and in September 2017, according to a report by the country's Interior Ministry some 2200 migrants and refugees remained in Bulgaria. Debate surrounding migrants in Bulgaria has been contentious. In December 2017, in order to capitalise on Bulgaria's current Presidency of the Council of Europe, UNHCR published a comprehensive report detailing several recommendations that Bulgaria should adopt to better support the integration of refugees (UNCHR 2017). The report criticised Bulgaria's current approach to migrants and refugees as reliant on mandatory procedures which are not currently responsive to global resettlement needs (UNCHR 2017). External reporting of the situation has commented on conflict between Bulgarians and migrants; *The Journal* reported that one Syrian family faced a hostile reception from demonstrators in Elin Pelin outside of the capital Sofia (The Journal, 2017). The decision made by signatories of the open letter to identify Article 60 as a clause that threatens Bulgarian national security is strategic; by highlighting Bulgaria's commitments in the refugee crisis the open letter draws upon an existing topic of controversy as a resource. Furthermore, the letter negatively reconstitutes the meaning of "gender specificities" with the implication that they will undermine Bulgarian sovereignty and threaten national security.

Existing literature regarding anti-gender discourse has been comprehensive in their analysis of the close relationship between anti-gender and nationalist discourses. Several scholars have noted that as a result, anti-gender discourse is frequently used as a signifier of anti-European, anti-EU and anti-Brussels where these transnational powers are perceived as interventionist forces. Kuhar and Paternotte note that anti-genderists have come to blame international and supranational powers in the European context under the umbrella term, "Brussels" (Kuhar and Paternotte 2017, p 14). They note that "European" and "Brussels" have in turn become a signifier for the imposition of perverted laws upon powerless people (Kuhar and Paternotte 2017). Kovats, Poim and Tanczos further outline the partnering of anti-gender and anti-EU rhetoric as a transnational discourse where anti-gender participants regard gender policies as "orders coming from Brussels" (Kovats, Maari and Poim 2015). In comparison, the open letter against the Istanbul Convention articulates its anti-EU rhetoric by way of "orders coming from GREVIO". The open letter scrutinises the role played by the monitoring body for the Istanbul Convention which is portrayed as a powerful mechanism to which Bulgarian national law will be beholden. The letter states, "The Istanbul Convention provides for the establishment of a large-scale mechanism (GREVIO) to monitor the implementation of the Convention. It could

undermine the national competence and the exclusive position of the EU court” (Appendix A, 35-37). As a norm agent actively engaged in the public discourse surrounding the Istanbul Convention and witness to the rise of the anti-gender campaign, Kutseva notes “GREVIO committee, which they used like “it will be a police”, “a gender police” who has the status, even bigger than a diplomatic status, which is going to allow them...sue Bulgaria against discrimination; we are going to be all the time in the Strasbourg Court” (Appendix E, 344-346). Again, the discourse surrounding gender encapsulates a multitude of concerns for the anti-gender campaign. As outlined in the open letter the notion of immunity is applied to GREVIO; it’s powers are superior to both the European Court and greater than Bulgarian national laws. The framing of GREVIO as an external powerful imposition on Bulgarian national competence suggests that Bulgaria is both inferior and incapable, is motivating and emotive narrative. It is at once an expression of tactics employed by anti-gender campaigns across Europe and evidence of the broader contextual debate that pits liberal western ideologies against traditional, nationalist, even Russian values.

The connections between anti-gender discourse and politics have been summarised by Kuhar and Paternotte as “gender ideology” as strategy (Kuhar and Paternotte 2017). This interpretative framework has been used as a lens through which to unpack the politics of anti-gender campaigns and draw wide ranging conclusions that establish the liberal definition of gender as a social construct on one side, and the conservative definition of gender as biological attributes on the other side. In order to preface subsequent discussion regarding “gender ideology” as strategy in Bulgaria, we return briefly to norm circulation and the theoretical dimensions offered by Acharya. Acharya notes that discourse surrounding norms have been co-opted by “moral cosmopolitanism” where ‘good’ global norms promoted by Western-based norm entrepreneurs are brought to bear upon ‘bad’ local ideas (Acharya 2013). As noted previously, the role of GREVIO as an independent monitoring body provoked an intense reaction within the anti-gender campaign. In this way, it is easy to consider the perception of the body as marked by “moral cosmopolitanism” when coupled with the suggestion made by Kutseva that public debate considered GREVIO as a “gender police” (Appendix E, 344). Moreover, the Istanbul Convention, GREVIO and the Council of Europe are targeted by the anti-gender campaign’s anti-European narrative because they promote gender equality based on the definition of gender as social construct. Kutseva argues that this conceptualisation of gender has been perceived as incompatible with Bulgaria ideals because it is a European concept (Appendix E, 231-233). She further argued that this had significant repercussions in Bulgarian politics where Bulgarian politics did not wholly understand gender, or gender equality. Kutseva noted, “when they talk about gender equality, it is something really imposed from Europe...this discourse is transported

here” (Appendix E, 232-233). The fact that the concepts of gender equality and gender, as they are outlined in the Istanbul Convention, did not originate in Bulgaria is a source of contention for anti-gender participants. Within this framing, the gender equality norm in the Istanbul Convention is “othered” because it is marked by moral cosmopolitanism, it originated in European and despite this, it is being imposed in Bulgaria.

There is a further historical element here that contextualises the framing of the Istanbul Convention by the anti-gender campaign. Kutseva speculates that the nationalist rhetoric at work in the open letter is reinforced from Russia; “the nationalistic rhetoric is something opposite to the EU membership, to the liberal values, freedoms...Which is opposing our traditional affiliation with Russia” (Appendix E, 169-172). Kutseva’s observation of this in the anti-gender campaign is heavy with symbolism, of Putin she states, “the vision he has...like for the third Rome, for the saviour of the Orthodoxy, Christianity in its purity and so on and this is a very strong narrative in Russian national identity” (Appendix E, 290-292) Again, existing analysis of anti-gender mobilisations in Europe has confirmed the influence of Russia as the ideological counter agent to western liberal values. Kevin Moss writes that since the mid 2000s “traditional values” have become the national idea of Russia (Moss 2017, p 195). He notes that deployed externally the Russian conceptualisation of “traditional values” is an “exceptionalist-messianic pose” which presents Russia as the saviour of Europe, leading defender of true European values which are defined through the traditional heteronormative family (Moss 2017, p 195). The influence of Russia as a contributing factor in the framing of the Istanbul Convention in Bulgaria is further evidenced by Moss’s assessment that Russia’s anti-gender position is an expression of its opposition to the decadent, liberal West (Moss 2017, p 195). Moss argues here, that anti-gender forms part of Russia’s geopolitical strategy to unite like-minded traditionalist forces in order to gain international status and ultimately destabilise the European Union (Moss 2017, p 195). As a norm agent, Kutseva was very aware of the influence of Russia in the public debate surrounding the Istanbul Convention and her observation of Russia involvement is comparable to conclusions drawn by Moss. Furthermore, while neither the Holy Synod or the open letter against the Istanbul Convention explicitly cite Russian values as motivators for their opposition to the document, each text frequently refers to “traditional values” which are defined as the traditional, heteronormative family. This conceptualisation of “traditional values” in opposition to gender, and gender in the Istanbul Convention can be seen is a transnational discourse stemming from Russia. Here the framing of the Istanbul Convention has taken on a far wider political significance where the anti-gender discourse exemplifies and ideological struggle between liberal, western Europe and traditional, Russia values.

A further layer of complexity added to the framing of the Istanbul convention as European interference with the fact the Istanbul Convention's definition of gender does not translate into Bulgarian. The Istanbul Convention is the first international convention which defines gender as a social construct and in the original English version of the text, both 'gender' and 'sex' are used. Here, the definition of sex is determined by biology and the gender refers to socially constructed roles that society considers appropriate for men and women. As is repeated throughout this analysis and indeed this study, this conceptualisation is the subject of active contestation amongst agents in opposition to the Convention. In Bulgarian there is only one word, "sex" and it was this term that was used in the Bulgarian translation of the Convention (Gotev, 2018). It is partly inevitable then, that "gender" and its definition in the Istanbul Convention is very problematic in Bulgaria. Kutseva notes, "in Bulgaria we have only one word. And it could be translated to sex. We don't have the word and also the notion of what gender is actually about...people actually started to, to think the gender equality and gender roles are actually expression of gender identity, gender like a sexual identity" (Appendix E, 155-156). As noted in *Figure 2*, the introduction of "gender identity" is identified by this study as a frame in itself and will be examined in greater detail in subsequent analysis. However, the notion that gender, as it is understood in the Istanbul Convention, does not translate into the Bulgarian language further fuels the suggestion that "gender" in the document is an ideology; a foreign construct that will impose on Bulgarian national order.

An underlying current in this nationalist narrative that frames the Istanbul Convention and its gender norm as a European interference is the opportunity for key actors within the debate to operationalise this narrative for strategic purposes. Here we might reflect on *Figure 1* and the timeline of events preceding Bulgaria's refusal to ratify the Convention. Published in December, the open letter against the Istanbul Convention was followed by statements on the 28th December by Deputy Prime Minister and Minister for Defence, Krasimir Karakachanov. In his statement Karakachanov claimed, "international lobbies are pushing Bulgaria to legalise the 'third gender'" and that having received the open letter against the ratification from 30 NGOs and civil organisations believed the Istanbul Convention was a "scandalous text" (Cheresheva 2018). Karakachanov is the leader of VMRO, the Bulgarian nationalist party who form part of the United Patriots, an alliance of three Bulgarian nationalist parties who are currently in coalition with the governing party, Citizens for European Development of Bulgaria (GERB). Karakachanov statement mirrors the conclusions drawn by academics working in the field who highlighted the overlap between anti-gender and anti-European narratives (Kuhar and Paternotte 2017; Kovats, Maari and Poim 2015). In terms of linguistics, Karakachanov suggestion of "international lobbies are pushing Bulgaria" echoes the

suggestion made by Kovats et al. that anti-genderists perceive gender policies as “orders coming from Brussels” (Kovats, Maari and Poim 2015). Karakachanov position was then matched by the Bulgarian Socialist Party (BSP) who announced on the 3rd of January 2018 that they too were in opposition to the Istanbul Convention. Gergana Kutseva was cynical when asked about BSP’s opposition to the convention, she highlighted the fact that the party are in opposition and had lost a portion of their voters to GERB (Appendix E, 135). Furthermore, reporting at the time Euractiv stated, “BSP accuses the government of raising the issue of the Convention’s ratification by “creating tension and hatred” in society” (Gotev 2018). BSPs decision to publicly criticise the governing party as well as the convention hints at the manipulation of anti-gender discourse for political gain. The BSP did also denounce Article 14 of the convention which stipulates the teaching of non-stereotyped gender roles in formal curricula, however, the party was vocally supportive of ratification as late as September 2017 (Chereseva 2018). It is difficult to reconcile BSPs reverse in opinion as anything other than strategic, indeed the actions of both VMRO and BSP appear to be populist choices. Anti-gender and “gender ideology” discourse was gathering momentum in public debate during December 2017 and through to January 2018 and both parties capitalised upon the framing of the Istanbul Convention for their own advantage.

Let us return to *Figure 2* and turn from the framing of the gender norm within the Istanbul Convention to the next sub-frame; “the Istanbul Convention is unconstitutional”. The framing of the Istanbul Convention in this light was instigated by Bulgarian Orthodox Church who announced their opposition to the ratification of the Convention in Bulgaria in a statement published on January 22nd 2018. In their statement, the Holy Synod contends international laws and treaties must be aligned with the Bulgarian Constitution (Appendix B, 82). As a result, the ratification of the Istanbul Convention would lead to the amendment of national legislation in order to make way for the Convention’s conceptualisation of gender (Appendix B, 79-80). This imposition of this is twofold. Firstly, the amendment of national legislation exemplifies the intervention of foreign concepts and policies in Bulgaria national order, and secondly, it reinforces the suggestion that the gender norm within the Istanbul Convention is an ideology; Bulgaria’s constitution will have to be changed in order to accommodate this conceptualisation of gender. Further to this, the Holy Synod’s statement is consistent in its rejection of the definition of gender as a social construct and repeatedly notes that as God created men and women, gender can only be determined by biological traits. As seen in *Figure 2*, this rhetoric in itself is a framing of the Istanbul Convention that will be further discussed in the following sub-sections. The effect that the statement of the Holy Synod had the public debate surrounding the Convention is clear, as shown in *Figure 1*, on 7th March the document was retracted

from government and submitted to the Bulgarian Constitutional Court for review. The Holy Synod's framing of the Istanbul Convention as an unconstitutional text which could undermine Bulgarian national sovereignty had real time repercussions.

When questioned regarding the role of the church, Gergana Kutseva argued that whilst the statement from the Holy Synod impacted the public discourse surrounding gender and the Istanbul Convention, debate was also ignited by the contribution of a famous lawyer (Appendix E, 395-414). Kutseva recalled that Vladimir Sheitanov publicly stated that the Istanbul Convention was a violation of the Bulgarian Constitution (Appendix E, 401-413). Sheitanov is known in Bulgaria for his involvement in a HIV trial in Libya where five Bulgarian nurses and a Palestinian doctor had their death sentences, for allegedly contaminating Libyan children with HIV, overturned (Associated Press, 2007). The negotiations were a site for international diplomacy and saw a delegation from Paris which included Cécilia Sarkozy, wife of the then French president Nicolas Sarkozy, and Benita Ferrero-Waldner, the then EU commissioner for foreign affairs, join the negotiations to have the accused returned home (Associated Press, 2007). His position on the defence team has afforded Sheitanov a platform in Bulgaria and Kutseva argued that as a result, his announcement that the Istanbul Convention was unconstitutional contributed to the contestation circulating the legislation (Appendix E, 407). The framing of the Convention as unconstitutional demonstrates that gender, when defined as a social construct, elicits reactionary responses that can be seen to escalate. We need only consider *Figure 1* here to trace the how the given meaning of gender in the Istanbul Convention is reconstituted and note how statements made by key actors have affected the political decision making.

The assertion by the Holy Synod that the Istanbul Convention and the gender equality norm it introduces is unconstitutional is closely linked to the suggestion that Convention has a hidden agenda. This is a central tenant of the understanding of gender as an ideology and is explored by Kuhar and Paternotte in their analysis of anti-gender campaigns (Kuhar & Paternotte, 2017). Noting that because the conceptualisation of gender is contested and uncertain across contexts, anti-gender movements utilise “common sense” and “binary divisions” in order to divide between “us” and “them” (Kuhar & Paternotte 2017, p. 14). This discourse has been previously captured in the framing of the Istanbul Convention as legislation which undermines the Bulgarian national order, but arguably it the statement from the Holy Synod makes plain this suggestion. The statement from the Holy Synod furthers grounds for the rejection of the Convention by resituating the debate in binary terms of “us” and “them”. Central to the “us” is the understanding that the Convention is

unconstitutional, and integral to the “them” is the suggestion that the Convention introduces gender as an ideology. We have already examined earlier symbols used in this particular frame with the suggestion understanding the English term for gender does not translate in Bulgarian, or that the inherent liberalism of the Convention contradicts the historical ties between Bulgaria and Russia. Consider here, then, the suggestion that the Convention hides a separate agenda as a further framing of the document as a foreign intervention which imposes concepts and understandings that are at odds with Bulgarian national sovereignty. The Holy Synod argues that true meaning of the Convention is made plain by the frequency with which the terms “gender” and “sex” are used (Appendix B, 46). Referring to this as, “a fact indicative in itself to suggest the true meaning of the Convention and what it pursues, beyond the noble goals of protecting women from violence and domestic violence” (Appendix B, 47-48). The statement notes the contradictions between the English version of the legislation which refers to both “sex” and “gender” and the Bulgarian version which uses only “sex” (Appendix B, 52-55). Before explicitly rejecting the Convention’s definition of gender as a social construct and the gender norm that conceptualisation introduces, because the Holy Synod argues that gender can only be biologically determined (Appendix B, 64-65). Therefore, the definition of “gender” in the Convention is not only “othered” it is wrong. The Synod refers to the norms included in the Convention as, “theories, a product of social engineering, and which affects the foundation of society-man, his faith, family and moral values” (Appendix B, 24-25). The substitution of Bulgarian national order and sovereignty for the Istanbul Convention’s “ideology” is heartily rejected. The meaning of gender within the Istanbul Convention is not only reconstituted here, but it epitomises the “us” and “them” binaries at the heart of “gender ideology” discourse.

Let us consider the frame, the Istanbul Convention undermines Bulgarian national sovereignty, in its entirety. This sub-section of the master frame captures the processes by which the Holy Synod and the signatories of the open letter against the Convention have framed the gender norm embedded in the Convention text. There is evidence of both “gender ideology” as discourse, and “gender ideology” as strategy; the two interpretative frameworks offered Kuhar and Paternotte, In the the framing of the Convention as legislation which undermines Bulgarian national sovereignty, “gender” is a common enemy, othered and foreign. The meaning of gender is stretched to include criticisms of GREVIO as a monitoring body with immunity, as well as a concept which is unconstitutional, at odds with the traditional, national Bulgarian identity and as legislature which carries a hidden agenda. When this narrative is considered alongside the timeline of key events drawn in *Figure 1*, the actions of Bulgarian politicians can be evidenced as employing “gender ideology” as strategy.

4.1.2 Gender and the violation of religious teachings

To continue the analysis of the anti-gender campaign in Bulgaria and further examine the frame schemata drawn in *Figure 2*, we now move across the master frame to consider the Istanbul Convention and the Bulgarian Orthodox Church. Elements of religious traditions and the teachings of the Bulgarian Orthodox Church are apparent across several frames identified in *Figure 2*. However, the statement made by the Holy Synod is also representative of a single framing of the Istanbul Convention and gender; the Istanbul Convention's definition of gender goes against god.

The text begins with a quote from the bible, ““So God created man in his own image; in the image of God he created them; male and female he created them.” (Genesis 1:27)” (Appendix B, 5-6). The Holy Synod build their case against the ratification of the Istanbul Convention based on this “biblical truth” (Appendix B, 5). This point is reverted to throughout the text as the foundational grievance with which the Convention cannot be ratified; gender can only be biologically determined because men and women are created by God (Appendix B, 38-39). In this way, the Istanbul Convention's conceptualisation of gender as a social construct is a violation of the word of God, whose own construction of gender is transcendent and divine (Appendix B, 13-14). Consequently, the Holy Synod rejects the gender norm in the legislation, stating, “the Bulgarian Orthodox Church does not accept the legalisation of categories such as...gender as “socially rooted”, “gender”, “non-stereotyped gender roles”” (Appendix B, 64-65). The framing of the Istanbul Convention as contradictory to traditional religious teachings has significant ramifications for the Holy Synod themselves, and for the trajectory of the debate surrounding the ratification of the document. The situation was contextualised by Kutseva who explained that the publication of Holy Synod's opinion on the Istanbul Convention is only the second time in Bulgaria's history that the church has engaged in politics (Appendix E, 185). The first instance was during World War II when Bulgaria was allied with the Axis powers. The Nazis pressured Bulgarian authorities to deport Jews within the country but the Bulgarian authorities continually cited their need for Jewish labour as an overriding obstacle (Neuburger 2013). Public and religious opposition to the Nazi agenda meant that Bulgaria “saved” an estimated 48,000 Jews from deportation to concentration camps in Poland³ (BBC 2013). Therefore, the intervention of the Bulgarian Orthodox Church with the publication of this statement takes on a historical and poignant significance within Bulgaria. The national story that Bulgaria “saved” its Jews

³ It is worth noting that there is heavy academic scepticism attached to the notion that Bulgaria “saved” its Jews. 11, 343 Jews from northern Greece and Thrace which was under Bulgarian control were deported to concentration camps and Jews who remained in Bulgaria were exiled or placed in forced labour camps (Neuburger 2013, p. 158). While these Jews survived the war, recent testimonies surrounding their treatment in the camps has undermined the national patriotic narrative (Neuburger 2013, p. 60).

is a point of pride, and as a result, the churches opposition to the Istanbul Convention is imbued with a sense of morality; they last intervened to save lives and the contents of the Convention is such that they feel compelled to do so again. The framing of the gender norm within the Convention as the introduction of ideas and ideals that go against the word of God is coupled with the significance of the intervention by the Bulgarian Orthodox Church. In this way, the opinion of the Holy Synod constitutes a damning indictment of the Istanbul Convention in a most public manner.

In master frame drawn in *Figure 2* the contents the sub-frame, “the Istanbul Convention goes against God”, is less diverse than those encompassed under “the Istanbul Convention introduces “gender identity” or “the Istanbul Convention undermines Bulgarian national sovereignty”. However, we must consider that frames are both individual and social, they are made up of individually held cognition which is then shared by enough individuals to channel behaviour in shared and patterned ways (Johnston 2002). Religion is perhaps the most emotive resource for igniting shared cognitive understanding and as a result, the significance of the framing of the Istanbul Convention within the statement made by the Holy Synod cannot be underestimated. When we consider Bulgaria’s rejection of the Istanbul Convention as an instance of transnational anti-gender sentiment we can further gauge the impact religious actors have upon “gender ideology” discourse. In Austria, Mayer and Sauer identify Catholic organisations as actors within the “gender ideology” alliance at work in the country (Mayer and Sauer 2017, p 28). Here the religious organisations make the spreading of Christian values and the refuting “gender” as their goals. In Poland, the church is credited as the originators of the country’s anti-gender campaign. On the 29th December 2013 the Pastoral Letter of the Bishops’ Conference was read in Polish parishes (Graff and Korolczuk 2017, p 175). In the letter representatives of the clergy claimed that, “gender ideology is the product of many decades of ideological and cultural changes...It maintains that biological sex is not socially significant and that cultural sex, which humans can freely develop and determine irrespective of biological conditions, is most important” (Korolczuk 2014). The letter argued for the destructiveness of gender ideology to mankind and catalysed further initiatives undertaken by the Catholic Church and conservative groups who lobbied against gender equality education and legislation in the country (Graff and Korolczuk 2017, p 175). The actions of the Holy Synod in Bulgaria are aligned with the actions of religious actors in the anti-gender movement as it traverses transnationally across Europe. In Bulgaria, this analysis has demonstrated that the intervention by the Holy Synod is not just significant for religious Bulgarians but bears broader cultural significance as this is only the second time the church has intervened in national politics. The opinion of the Holy Synod contributes to the wider rhetoric that “gender” in this legislation is an ideology while also

taking the moral standpoint, reinforced by divine teachings that his understanding of “gender” is a violation of the word of god.

4.1.3 “Gender identity” and the degradation of society

The final frame to be discussed in *Figure 2*, “the Istanbul Convention introduces “gender identity”” represents an amalgamation of symbols, supporting arguments and key issues identified in both texts under analysis. The statement from the Holy Synod and the open letter against the Istanbul Convention are expansive in their discussions on what the gender norm in the Convention could legitimise in Bulgaria. Namely, the third sex, same-sex marriage and the dissolution of traditional family values. This chapter has already discussed the fact that gender, as it is defined in the Istanbul Convention does not translate into Bulgarian, which only has one term; sex. The meaning of gender in the Istanbul Convention was then reconstituted and reconceptualised during the public debate. This process saw the emergence of understanding gender as “gender identity” the suggestion that gender was a choice and with a close relationship to sexual identity. Gergana Kutseva noted that as the Bulgarian Fund for Women advocated for the ratification of the Istanbul Convention, the conflation of gender, gender equality, gender identity and sexual identity was a central concern in their efforts (Appendix E, 152-160). The framing of gender as a choice made by the individual rather than by societal expectation, devolved into anti-LGBTI discourse in the country. “Gender” and “gender identity” was animated by the anti-gender campaign who strategically reinforced the connection between gender and sexuality in order to perpetuate the idea that the gender norm in the Istanbul Convention would ultimately erode Bulgarian traditional values. This framing process is captured in the three sub-frames devised in *Figure 2*: (1) legitimises same-sex marriage; (2) contradicts traditional values-family values; and (3) legitimises the third sex.

To begin, the framing of “gender” in the Istanbul Convention in terms of “gender identity” emphasises gender in relation to individual choice. This concept is at odds with the given meaning of gender in the Istanbul Convention which establishes the following norm in Article 3c, “ ‘gender’ shall mean the socially constructed roles, behaviours, activities and attributes that a given society considers appropriate for women and men” (Council of Europe 2011). The norm established in the Convention text orientates on the understanding of gender in relation to external societal pressures. However, the adoption of this norm in Bulgaria, as has been discussed so far in this analysis, has been problematic and contentious. The discursive struggle to define gender in the Istanbul Convention by key agents of the norm has drawn upon existing contextual debates. No more so that the anti-gender campaigns anti-LGBTI propaganda. As Kutseva discussed in her interview, “we

couldn't allow gay people to marry in Bulgaria. This is not traditional, this is against the natural orders. There is not the slightest recognition of human rights" (Appendix E, 196-198). Kutseva goes on to note that due to existing anti-LGBT rhetoric in the country, the anti-gender campaigns linkage of gender with "gender identity" and sexuality was a powerful narrative (Appendix E, 198-200). The framing of gender in the Istanbul Convention as a concept which legalised same-sex marriage gave way to a visual counter narrative which, Kutseva speculated, further reconstituted the meaning of the gender norm. Kutseva comments on the popular discourse surrounding same sex couples stating, "they are going to ask for our children, they would like to adopt our children" (Appendix E, 199). This suggestion was linked to the Norwegian Child Welfare Service, Barnevernet (Appendix E, 349). Barnevernet been accused by protestors for "kidnapping" children from their families by being excessively interventionist (Whewell 2016). The service has come under international scrutiny with the Czech President Milos Zeman accusing Norwegian social workers of acting like Nazis (Whewell 2016) and nine child welfare cases have been brought before the European Court of Human Rights (Science Nordic 2018). However, the suggestion that these children were then given to LGBT couples seems to be generated in Bulgaria. The argument that the ratification of the Istanbul Convention will allow for the removal of children from their families is a powerful re-framing of gender within the convention. Furthermore, this discourse has been repeated by anti-gender campaigns across Europe, Mayer and Sauer noted that "gender ideology" in Austria is considered a threat because it will lead to the "feminisation of society" (Mayer and Sauer 2017, p 34). Here the feminisation of society symbolises the end of male virtues in Europe with the erosion of the heteronormative family model, which will result in demographic decline and the destruction of Christianity as the basis of Western civilisation (Mayer and Sauer 2017, p 34). In this way, the anti-gender discourse circulating in Bulgaria matches "gender ideology" rhetoric perpetuated in other European countries. Furthermore, this framing of the gender in the Istanbul Convention as "gender identity" further stretches the given meaning of the gender norm and criminalises the conceptualisation of gender as a social construct.

The contention that same-sex marriage in Bulgaria goes against traditional societal expectations is developed alongside the second sub-frame drawn in *Figure 2*: "Istanbul Convention contradicts traditional values-family values". In the statement from the Holy Synod, we are left in no doubt of the belief that "gender" in the Convention devalues the foundations of Bulgarian society. The text makes repeated reference to "national traditions" (Appendix B, 152), "faith, family and moral values" (Appendix B, 25) and "concepts incompatible with the Bulgarian public order" (Appendix B, 12). These references argue for the rejection of the Convention in order to uphold both Bulgarian

traditional values and national identity. However, in their statement the Holy Synod does not define what “traditional values” entails, they not only that the Convention undermines them. In contrast, the open letter against the Istanbul Convention offers two distinct narratives in order to understand how the Convention violates traditional and family values. The first of this is the discourse surrounding the rights of parents (Appendix A, 23-25) and the second is the promotion of heterosexual marriage (Appendix A, 6-7).

Previous research regarding anti-gender campaigns has demonstrated that the rights of parents is a common rhetorical package in which anti-gender sentiment is generated. Examining the anti-gender movement in Austria, Mayer & Sauer noted how “concerned parents” became actors of gender ideology when they lobbied against sexual education and the use of gender sensitive language in schools (Mayer & Sauer 2017, pp.27-28). In Croatia, the Roman Catholic Church framed their campaign within parents’ rights to decide on the upbringing of their children in order to counter a proposed sex education module in schools (Kuhar 2014). In Bulgaria, the rights of parents is again deployed in the open letter against the Istanbul Convention, the text states, “the Istanbul Convention will lead to the study of “non-stereotyped gender roles ...it will deprive parents of their right to educate their children in accordance with their moral and religious beliefs” (Appendix A, 14-15). This is evidence of “gender ideology” as discourse, the signatories of the open letter against the Istanbul Convention have reiterated anti-gender discourse by using frames employed by other European anti-gender movements. In doing so, the open letter against the Istanbul Convention contributes to the wider reframing of “gender” within the convention as an ideology and a violation of traditional values.

The open letter further frames gender in the Istanbul Convention as a violation of traditional values with its discussions on heterosexual marriage. In order to contextualise this argument, it is necessary to consider the background of the signatories of the open letter against the Convention, the Society and Values Association (SVA). SVA defines its mission as, “to be an effective influence in the development of the society by promoting values and policies protecting the dignity and freedom of the individual, marriage and family” (Society and Values Association 2018a). Marriage is understood as between one man and one women, which is considered as the “natural family”. It is from this perspective that the open letter against the Convention targets the concept of gender as “gender identity” by criticising the impact this conceptualisation has on sexuality, marriage and family. The implication is made that if gender is no longer defined by your sex as a man or a women then the traditional conceptualisation of marriage as heterosexual is no longer valid. Within this frame

circulates the previous suggestion that “gender” is an ideology which will led to the “feminisation of society” where marriage is no longer between men and women, because gender no longer means men and women. Therefore, as same-sex marriage becomes legitimate humanity will not reproduce and society with deteriorate (Mayer & Sauer 2017). The rootedness of this frame in family values is poignant, it contrasts the familiar, widely accepted notion that men and women will marry and have children, with a more diverse fluid suggestion that men and men, women and women, or men and women may marry, and may or may not have children. While this is framed as an erosion of traditional, natural family values but it is also connected to the framing of “gender” as a violation of the rights of parents. In Slovenia, Kuhar concluded that the rights of parents to protect the wellbeing of children was deployed by the Roman Catholic Church during the Family Code debate. The Family Code proposed reforming existing definitions of family and marriage in order to put heterosexual and homosexual couples on equal legal footing, including the right of same-sex partners to second-parent and joint adoptions (Kuhar 2014). Arguments against the Code were framed as the rights of parents to protect both their children from the influence of “gender identity” and the promotion of heteronormative family models as the stable, paradigm family structure (Kuhar 2014). Again, the framing of gender in the Istanbul Convention in this open letter invokes arguments made by other anti-gender campaigns in Europe. This is at once evidence of transnational “gender ideology” discourse and further reconstitutes the meaning of gender within the Istanbul Convention. Moreover, this reframing of the gender norm as a violation of traditional family values, rights of parents and heterosexual marriage further alters the Bulgarian public’s perception of the Istanbul Convention. The contents of this frame criminalise the gender norm in the Convention as it is all consuming in its intervention; it has the ability to degrade society, halt reproduction and the rights of parents, and dismantle the marriage as an institution.

The final element of the frame, “the Istanbul Convention introduces “gender identity”, is the suggestion that the Istanbul Convention and the gender norm embedded in its framework legitimises the third sex. This reconstitution of the meaning of gender in the convention has made for fertile ground for those within the anti-gender campaign. This claim is made explicit in the open letter against the Istanbul Convention;

Another serious negative consequence of gender redefinition is that of men who consider themselves to be women who are increasingly appearing among female athletes and dominate in lifting, running, fighting, cycling, American football, basketball, mixed martial arts and more. (Appendix A, 28-30).

This framing introduces the concept that the definition of gender as a social construct and acceptance of a third sex is deceitful, transsexual people are not recognised and therefore considered as men who play women's sports, which is cheating. The open letter also includes a second image, "(ratification of the Convention) will lead to policies that allow boys and men who consider themselves women to use toilets, baths and changing rooms designed for women, incl. in public schools" (Appendix A, 16-17). Here the legitimisation of the third sex is conceived as a violation of the public space. The essentialist definition of gender argues for two categories, men and women, and it is on this understanding that society has designated urban spaces for men and women. The open letter fosters the notion that the third sex, which is legitimised by the Convention's gender norm, is unnatural because it has the power to disrupt basic, practical divisions that exist between men and women. Such as, male and female toilets, changing rooms or baths. This framing took on a wider strategic significance because it was used by VMRO and BSP. As mentioned, the decisions made by these parties can be interpreted populist; "gender ideology" discourse has been employed as strategy. The argument that the gender norm in the Istanbul Convention legitimises the third sex contributes to the wider framing that the Istanbul Convention introduces "gender identity". Within this wider framing, gender is an empty signifier where the discourse that surrounds it is electrified with symbolism and visual imagery. In this framing process, gender in the Istanbul Convention symbolises the degradation of society, the end of marriage and the heteronormative family but it is also criminalised as a method by which children will be made vulnerable and women will find their security compromised by transsexual people.

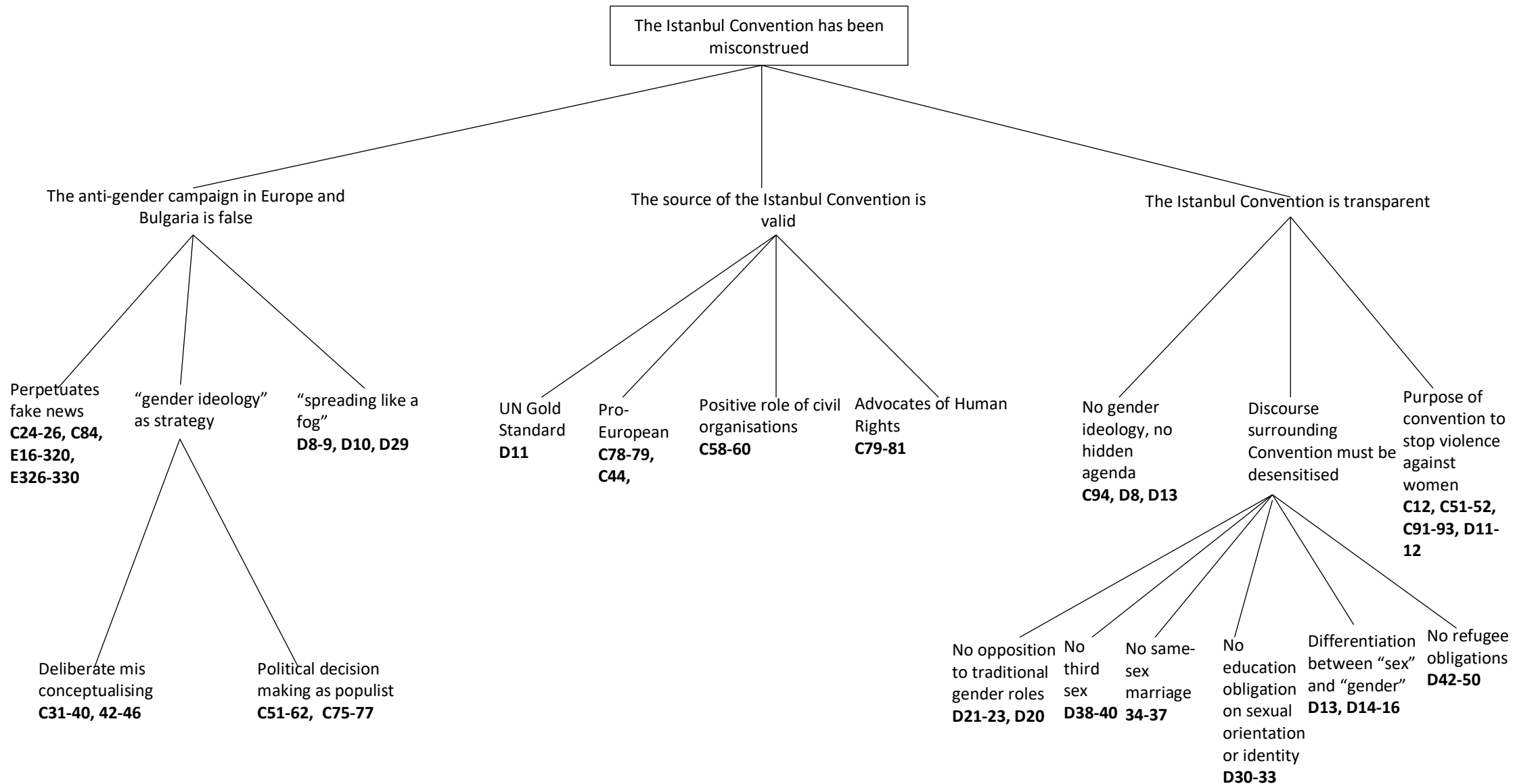
Considered in its entirety, the master frame drawn in *Figure 2* has demonstrated the use of "gender ideology" as discourse, and "gender ideology" as strategy by anti-gender actors in Bulgaria. The process by which each of the three sub-frames was developed in statements from the Holy Synod and in the open letter against the Convention, has been outlined, contextualised and analysed. However, it is necessary to briefly connect the two interpretative frameworks offered by Kuhar and Paternotte, "gender ideology" as discourse, and "gender ideology" as strategy, with the four dimensions of norm circulation. Collectively, the frames identified in *Figure 2*, trace the circulation of the norm embedded within the framework of the Istanbul Convention from its source, to norm entrepreneurs, to the context in which it was received and the norm agents who have promoted the norm. In this case, these norm agents have promoted resistance to the conceptualisation of gender within the Istanbul Convention, this resistance can be categorised as, "gender" in the Istanbul Convention is an ideology and must be rejected. In keeping with norm circulation, this analysis chapter will now turn to efforts of norm agents in support of the Istanbul Convention. It will consider

the attempts to reclaim the narrative surrounding the Istanbul Convention and highlight the feedback offered to norm entrepreneurs by norm agents.

4.2 Marshalling support for the Istanbul Convention

This chapter will now consider the master frame drawn in *Figure 3*- “the Istanbul Convention has been misconstrued” and where the discussion will focus upon the reframing of the gender norm in order to motivate support for the Istanbul Convention’s ratification in Bulgaria. The data gathered in this study is representative of the circulation of the gender norm within the Istanbul Convention in Bulgaria; the two sets of textual materials can be categorised as resistance and feedback. Here, the supporters and opponents of the Convention challenge, stretch, reconstitute and reiterate the meaning of the document’s gender equality norm. To contextualise this norm circulation, consider the timeline of events in *Figure 1*. In April 2016, the Istanbul Convention is signed in Bulgaria, towards the end of 2017 public debate surrounding the Convention becomes increasingly active and in early 2018 we see key agents in the norm adoption become increasingly vocal in reaction to the rise of anti-gender discourse. On the 27th of January an open letter signed by 200 NGOs and civil organisations in support of the ratification of the Convention was published. This open letter was also distributed to institutions, NGOs and civil organisations outside of Bulgaria in order to lobby for external support. On March 8th, Bridget O’Loughlin the executive secretary of the Istanbul Convention published an opinion piece in the EU Observer. The text, titled “Istanbul Convention: Clearing away the fog of misconception”, was widely distributed in an attempt to refute the claims made by anti-gender campaigns in Europe. Analysed in conjunction both texts represent further reframing of the Istanbul Convention in order to reclaim the meanings applied to the given gender norm by the anti-gender campaign in Europe and in Bulgaria. The following sub-section will expand upon the frame schemata devised in *Figure 3*. As accompanying text to the master frame employed by supporters of the Istanbul Convention, this chapter will continue further examining the three frames identified; (1) the Istanbul Convention is transparent, (2) the anti-gender campaign is false, and (3) the source of the Istanbul Convention is valid.

Figure 3: Master frame in support of the Istanbul Convention



4.2.1 Transparency in the Istanbul Convention

The first, and perhaps most important, reframing of the Istanbul Convention and its gender norm by its supporters is the suggestion that the Convention is transparent. Reacting against the conceptualisation of gender as an ideology by the anti-gender movement both the signatories of the open letter in support of the Convention and Bridget O'Loughlin explicitly refutes this claim. O'Loughlin states, "(the Istanbul Convention) forces no 'gender ideology' on states" (Appendix D, 13). To reinforce this, we might consider the linguistic choices of O'Loughlin who at the outset introduces the Convention by its full title; the Council of Europe's convention on preventing and combating violence against women and domestic violence (Appendix D, 4-5). In Bulgaria, early reception of the Convention was negative due to its common title as the 'Istanbul' Convention which is reminiscent of the Ottoman rule of Bulgaria. In this way, O'Loughlin sets the tone for her piece as one which seeks to defuse the speculation and contestation in the debates surrounding ratification. Similar text is used in the open letter in support of the convention, "(the convention) has no other hidden agenda" (Appendix C, 94). Within this frame, the both agents target specific claims made by the anti-gender campaign and attempt to desensitise the discourse used by clarifying the purpose of the Convention and its aims.

Efforts to desensitise the Convention are most apparent in O'Loughlin's opinion piece. Here, key narratives espoused by anti-gender campaigns which have reconstituted the meaning of the gender norm in the Istanbul Convention are listed and each is further explained. Initially the text looks to reclaim the narrative surrounding gender and "traditional family values". O'Loughlin writes, "gender refers to expected roles for women and men-and how too often these roles are defined by out-dated stereotypes that can make violence against women, intimidation and fear more 'acceptable'" (Appendix D, 21-23). O'Loughlin, in layman's terms, reapplies the original meaning of the gender norm in the Convention. She clarifies that the definition of gender as a social construct is an expression of the historical imbalance between men and women, whereby men have had power over women. O'Loughlin then looks to further defuse the additional meanings applied to the gender norm, stating, "Does that mean that our convention opposes traditional gender roles? Of course not." (Appendix D, 20). This theme is continued as O'Loughlin argues that women who wish to stay at home may do so, concluding, "(the Convention) was never designed to force women or men to live in certain ways" (Appendix D, 21-22). This structure is repeated as O'Loughlin focuses on claims made by the anti-gender campaign regarding education on non-stereotyped roles in schools. She begins by outlining the purpose of this education clause in the Convention, "education that the convention does require is to end stereotypes based on the idea that women are inferior to men-

and that it is okay for them to be beaten” (Appendix D, 23-24). Similar text is used in the open letter in support of the Istanbul Convention which highlights the need for gender education in schools where children can learn about gender stereotyping and the prevention of gender-based violence from an early age (Appendix C, 37-39). Having established the intended purpose of the education clauses, as understood by Council of Europe as the norm entrepreneurs, the text then addresses the claims made by anti-gender campaign to misconstrue the meaning of the norm. O’Loughlin begins, “the education obligation does not imply that states should include teaching material on sexual orientation and gender identity” (Appendix D, 30-31). She continues, “A common misconception is that the Istanbul Convention obliges states to have lessons at schools about sexual orientation. It does not.” (Appendix D, 32-33). Again, O’Loughlin’s linguistic choices are clear and direct, the stylistic antithesis of the discourse used by the anti-gender campaign which was heavy with visual imagery and emotive language. In addressing these two misconceptions of the convention, O’Loughlin looks to desensitise the discourse surrounding the gender norm.

The opinion piece written by O’Loughlin then appears to address concerns made by the anti-gender campaign surrounding the concept of “gender identity”. As noted in the previous section, “gender identity” emerged as a secondary conceptualisation of the gender norm in the Istanbul Convention which is closely linked to gender as an individual choice and gender as sexuality. It is here that the anti-gender movement introduced the claims that the Istanbul Convention legitimises the third sex, same-sex marriage and offers refugee status to transsexual migrants. O’Loughlin begins by clarifying the discourse surrounding same-sex marriage and LGBTI rights. She writes, “Some claim that our convention promotes same-sex marriage, but it makes no reference to the legal recognition of such marriage” (Appendix D, 34-35). O’Loughlin appears to further undermine the validity of this claim by making clear the legal limitations of the Istanbul Convention, stating, “the subject of same-sex marriage is outside the legal scope of the Istanbul Convention” (Appendix D, 36-37). We can consider the decision to acknowledge the legal limits of the Convention, and by extension the role of the Council of Europe, as strategic. An enduring theme throughout the framing of the Istanbul Convention by the anti-gender campaign in Bulgaria was the notion that the Convention was a European intervention with power over Bulgarian national legislation. In contrast, O’Loughlin desensitises the obligations set out within the Convention’s framework by noting that the document has no power to force the recognition of same-sex marriage in a national context. The same strategy is employed as O’Loughlin targets the claim that the Istanbul Convention legitimises the third sex. She writes, “nor does the convention oblige states to legally recognise a third sex under domestic law, as some people mistakenly believe” (Appendix D, 38-39). Here O’Loughlin re-establishes the

legal space between the Istanbul Convention and the Council of Europe as a transnational actor, and the role of internal governments and their domestic law. The final reiteration of this comes with O'Loughlin's address of the anti-gender campaigns claim that once the Istanbul Convention is ratified, governments will be forced to give refugee status to migrants who are transsexual. To this O'Loughlin notes, "another misconception is that the convention calls for a new "refugee status" for transgender or intersex persons, as has been sometimes erroneously reported" (Appendix D, 42-43). O'Loughlin orientates the framing of the obligation as an intrusion into domestic law by focusing subsequent text on the issues facing migrant women. She argues, "(the Convention) asks for asylum procedures to be carried out in a way that allows women to explain the reasons why they are fleeing" (Appendix D, 44-45). O'Loughlin continues, "whether this is because of rape to silence political expression, or because of the fear of being subjected to female genital mutilation, it takes time to say so" (Appendix D, 46-47). O'Loughlin reframes the integration of gender sensitive asylum procedures in order to defuse the discourse surrounding the claim that migrants who are transgender or intersex will be privileged with refugee status, and thus undermine national security. However, it is important to acknowledge that this reframing portrays women as victims in order to generate collective support for the Istanbul Convention. The choice of this discourse and its ramifications is complex. On the one hand, women are more likely to be victims of violence and migrant women even more so and as the first comprehensive legal framework on preventing and prosecuting violence against women it is essential that the Istanbul Convention acknowledge the specificities of those most vulnerable to violence. On the other hand, O'Loughlin uses imagery to elucidate her point highlighting rape and female genital mutilation (Appendix D, 46-47). There is a case to be made that O'Loughlin furthers the stereotypical portrayal of women as victims who must be cared for and protected in order to redirect the criticisms against the ratification of the Istanbul Convention. This tactic is emotive and powerful, though not without caveat.

The final element of this framing of the Istanbul Convention as transparent sees the culmination of discourse regarding the purpose of the document where both texts repeatedly discuss the document in relation to stopping violence against women. To exemplify this, the open letter in support of the convention refers to the Convention as "this crucial document" (Appendix C, 12). In an attempt to reclaim the conceptualisation of gender in the Convention as ideal which undermines traditional family values, the letter states, "all the measures provided for by the Istanbul Convention reinforce family foundations and links by preventing and combating the main cause of destruction of families, that is, violence" (Appendix C, 90-92). The insinuation that opponents of the Convention, whose main grievance is the devaluing of family values, should actually be in favour of the document

in an interesting reframing of the debate. By introducing the suggestion that violence against women causes the breakdown of families and that the purpose of the Istanbul Convention is the eradication of violence against women, the open letter successfully inverts claims made by the anti-gender movement. On this understanding, those against the document should actually be in favour of it; stopping violence against women keeps families together. Here the intended purpose of the Convention as a framework for preventing and combating violence against women is made transparent and further operationalised to stifle the counter narrative produced by anti-gender actors. The opinion piece by Bridget O'Loughlin similarly operationalises the purpose of the Convention; she highlights that moves against the Convention fell on International Women's Day (Appendix D, 3). In this way, O'Loughlin reframes the counter narrative of the Convention as one which is against women, and against the eradication of violence against women. Where the anti-gender movement targets the gender norm embedded in the Istanbul Convention, supporters of the document focus on the Convention's role in eradicating violence against women.

4.2.2 Discrediting the anti-gender campaign

Within *Figure 3* and the master frame for the campaign in support of the Istanbul Convention a second frame is identified, "the anti-gender campaign is false". Under this framing the supporters of the Istanbul Convention introduce the notion that the Convention has been misconstrued because the counter narrative of the opposition is false. While Bridget O'Loughlin appears to take a milder stance when addressing the arguments put forward by the anti-gender campaign, she also offers the simile that these misconceptions have spread "like a fog" (Appendix D, 9). This framing of the anti-gender discourse as a fog is apt; fog can be defined as obscuring or restricting visibility or as a state of perplexity or confusion. The first iteration implies that the actions of the anti-gender campaign are deliberate, the claims they have espoused regarding the Istanbul Convention and its gender norm are intentionally obscuring the concept. The second iteration is less engaged with the suggestion that many of these claims regarding gender in the Convention stem from confusion and lack of knowledge. However, either one of these interpretations casts doubt on the validity of the claims that the anti-gender has built their opposition upon. The open letter in support of the Convention outlines exactly how the anti-gender campaign has acted in order to obscure and reconstitute the given meaning of the gender in the document. The letter repeats the ways in which the anti-gender campaign reconstitutes the given meaning of the gender norm stating, "Opponents have claimed that the Convention will lead to the recognition of a "third sex", same-sex marriages, and rights for transsexuals and freedom for everybody to choose their own sex" (Appendix C, 31-32). The open letter refers to these not only as "myths" (Appendix C, 84) but as "absurd" (Appendix C,

33). The letter targets two previously examined claims, “the Convention would allow men who freely define their sex to go into women’s bathrooms or enable male athletes to compete in women’s races” (Appendix C, 34-35). The letter argues that these claims have obscured actual understanding of gender when defined as a social construct and have sowed confusion in the public sphere as to the true meaning of gender. In her interview, Gergana Kutseva of the Bulgarian Fund for Women gave further examples of how the anti-gender campaign circulated fake news articles in order to stir confusion and further stretch the meaning of gender in the Convention. She noted that these articles were relatively easy to identify because they often spelt gender the Russian way, not the Bulgarian way (Appendix E, 318). Here we might consider a point made previously that “gender ideology” has been used as strategy by key agents in the debate, Kutseva argued that this was evidence of Russian influence and interference in order to halt the integration of liberal, European tradition with a former Soviet state (Appendix E, 295-298).

Indeed, the notion that “gender ideology” as strategy is continued in the framing of the anti-gender campaign as false. However, it must be acknowledged that this discourse is most evident in the open letter signed by 200 NGOs and civil organisations in Bulgaria, rather than in the opinion piece produced by Bridget O’Loughlin. On the other hand, the open letter in support of the convention has two functions. First, it seeks to reframe the Istanbul Convention as a framework which must be ratified in Bulgaria and second, it is lobbying for external support from institutions and civil organisations. Therefore, the tone of the letter is florid at times in order to make plain the urgency of the situation and the difficulties faced by NGOs and civil organisations in the Bulgaria. In order to frame the anti-gender campaign as false, the open letter targets the wider anti-gender campaign before narrowing its focus to the Society and Values Association and the actions of several political parties. On the motives of the broader anti-gender narrative the letter explains, “the campaign, while claiming to support in principle the need to combat violence against women, has propagated a stream of lies and false propositions, through which the public debate around the Convention has become toxic” (Appendix C, 24-26). The letter argues that these actions have deliberately shifted the public debate from the Convention’s intended aim to stop violence against women, to a contentious debate surrounding the definition of gender. The letter identifies the Society and Values Association as a perpetrator of lies and controversies surrounding the Convention (Appendix C, 42-44). Once more, the framing of “gender ideology” as strategy is apparent as the letter speculates that the Society and Values Association receives external funding from the World Congress of Families. Co-founded by Americans and Russians, the World Congress of Families is a sub-division of the International Organisation for the Family a faith-based institution which promotes heterosexual

marriage and the “natural family” across the world⁴. There is the implication here that Society and Values are deliberating obscuring and re-contesting the meaning of gender in the Istanbul Convention in order to further their own agenda; the promotion and protection of marriage and family.

Whilst highlighting that the anti-gender campaign has been aggressive in its lobbying against the Istanbul Convention, the open letter also targets the actions of politicians as reactive. The open letter refers to the anti-gender debate as one which plays upon populist notions (Appendix C, 52) and as a result, politicians have changed their stance in order to retain power. This reactionary politics has been previously examined, but it is worth further considering that supporters of the Istanbul Convention have sought to frame the political decision makers in a negative light. We must consider here not only the discovery of the frame which classifies the anti-gender campaign in Europe as false, but the effects of this framing. Consider that the actions of VMRO were closely connected to the open letter published in opposition to the Istanbul Convention. By identifying the reactionary trends in Bulgarian politics, the open letter is shrewd in its dissection of the moves made by GERB and BSP. Regarding GERB, the letter notes, “GERB has decided to ask the Constitutional Court whether the Convention is in contradiction with the Bulgarian Constitution, the mere consideration of which is manifestly absurd” (Appendix C, 60-71). On BSP’s announcement that it is against the Convention the letter states, “This is a manifestly absurd and populist move, which is designed to delay or remove altogether the possibility for the Convention’s ratification” (Appendix C, 75-71). By attacking framing the political decision makers in Bulgaria as reactive and populist, the open letter perpetuates the frame that the anti-gender campaign is false and has been misconstrued. The argument is made that these parties have not publicly altered their position on the Istanbul Convention because they too believe that it is unconstitutional or legitimises the third sex, but because the Bulgarian reception of the anti-gender counter narrative has been so strong they that must alter their position to stay relevant. The frustration of the signatories of this open letter is clear, rather than changing their position on the Istanbul Convention, the efforts of these political parties should have been directed to clarifying the gender norm within the Convention. Instead, the open letter argues that they have been bystanders to the public debate and have not

⁴ When interviewed, Kutseva noted that once the open letter in support of the Istanbul Convention had been circulated the Society and Values Association removed their affiliation with the World Congress of Families from their website (Appendix C, 36-37). It has been reported that World Congress of Families is focusing its efforts in Eastern Europe, the organisation held its annual 2016 meeting in Tbilisi, Georgia and its 2017 meeting in Budapest, Hungary (Southern Poverty Law Centre, 2017). According to the news site, *Balkan Insight*, the 2018 meeting will be held in Chisinau, Moldova (Necsutu 2018)

sought to assuage the claims made by the anti-gender campaign and the controversy these have caused.

4.2.3 Validity of the Istanbul Convention

In order to refocus the attention upon the Istanbul Convention and the gender norm it integrates, we come to the final frame employed by supporters of the Convention; “the source of the Istanbul Convention is valid”. Here, civil organisations and NGOs in Bulgaria are agents of the gender norm within the Istanbul Convention. As discussed, they perceived the actions of Bulgarian politicians as reactionary to the public debate, choosing to respond to the anti-gender campaign rather than to reactive debate based upon the validity of the Istanbul Convention and its purpose to end violence against women. It is in this gap that the signatories of the open letter have sought to operate. Here, the open letter seeks to reframe the Istanbul Convention and the Council of Europe as good, valid, in order to counter the notion that the Convention and the Council of Europe are intervening in Bulgarian national law. There is pro-EU rhetoric in the open letter such as, “core European values of equality, diversity and tolerance” (Appendix C 44). As well as, “the European Union is based on a strong commitment to promoting and protecting human rights, democracy and the rule of law world wide” (Appendix C, 78-79). The letter further connects these attributes to those which reduce violence against women, writing, “Promoting human rights work can help to prevent and resolve conflicts and violence” (Appendix C, 80-81). Effort is made here to decriminalise the conceptualisation of the Istanbul Convention as a European, liberal imposition which is incompatible to the Bulgarian national context. This claim made by the anti-gender campaign has been previously examined in the master frame *Figure 2*. If we consider here the timeline established in *Figure 1*, it is clear that this open letter in support of the Istanbul Convention which was published following the release of the opinion of the Holy Synod, the open letter against the Istanbul Convention and announcements from major political parties, that the reframing of the Convention as valid is also an attempt to reclaim the discourse surrounding the convention. Here, it is not only the Istanbul Convention which is reclaimed, but the position of the norm agents and entrepreneurs. In her opinion piece, O’Loughlin refers to the “our” convention as “gold standard by the UN” (Appendix D, 11). This discourse here suggests that the Council of Europe is good because the convention it devised is of the highest standard. Secondary to this there is the implication that as the Convention has been classified as a high standard, it has also been vetted and approved by external actors. In this way, there is an attempt to refute the claim that the Convention pursues a “gender ideology”. As norm agents, the position of NGOs and civil organisations in Bulgaria was compromised by the anti-gender campaign. The open letter argues that opponents of the Istanbul Convention framed

supporters of the campaign as “foreign agents” (Appendix C, 60). The letter also maintains that its signatories were stigmatised as they advocated for the rights of women, LGBTI+ and refugees (Appendix C, 60). To combat this narrative, the open letter argues that these agencies work on behalf of those who are disadvantaged and consequently, opponents of this are negatively framed. When contrasting the discursive choices of both the opponents and supporters of the Istanbul Convention and the gender norm within the document it is clear that debate circulates about the contested meanings of gender. However, a second element is also apparent as we examine the framing of each side by each other, that is the “us” and “them” dynamic. This concept is closely linked to the theoretical considerations of this study and will be analysed in greater depth in the subsequent section.

4.3 Reflection upon norm circulation and the Istanbul Convention

The conclusion of this empirical chapter will refocus discussion in order to reflect upon the theoretical mechanisms employed in this research. The use of qualitative frame analysis explicitly captures the ways in which agents of the gender norm embedded within the Istanbul Convention have reconstituted the meaning of the concept and in doing so, has captured norm circulation in motion. Norm circulation theorises that the adoption of norms involves multiple-agencies and processes which are based on resistance, feedback and repatriation (Acharya 2013, p 471). The theory also maintains that norm circulation occurs when less powerful actors are marginalised in the norm creation process or feel betrayed by the abuse of the norm by more powerful actors (Acharya 2013, p 471). As a trio, the timeline of events in *Figure 1*, the master frame for the anti-gender campaign in *Figure 2* and the master frame for supporters of the Istanbul Convention in *Figure 3*, are representative of the circulation of the gender norm within the Istanbul Convention in Bulgaria. Each master frame consists of key, widely distributed texts which were developed by key norm agents. *Figure 2* has captured the resistance towards the gender norm and noted how the anti-gender campaign has considered “gender” in the Convention as an ideology incompatible with Bulgarian values. *Figure 3* has then demonstrated the feedback offered by advocates of the Istanbul Convention within Bulgaria, and the feedback given by Bridget O’Loughlin in attempt to alter the discourse surrounding the Convention. While *Figure 1* has contextualised key events, statements and the multiple processes by which the norm has circulated in Bulgaria. By reintroducing key components of norm circulation the following text will consider the gender norm embedded in the Istanbul Convention and its reception in Bulgaria in broad terms. It will then consider “gender ideology” as a competing norm and the extent to which this secondary norm is preferred in Bulgaria.

4.3.1 Gender, discursive disputes and “moral cosmopolitanism”

Acharya introduces her reformulation of norm diffusion theory on the basis that previous literature has been co-opted by a distinct “moral cosmopolitanism” (Acharya 2013, p 468). This notion is, as has been briefly discussed previously, applicable to the reception of the Istanbul Convention in Bulgaria. In *Figure 2* and *Figure 3*, the goals, aims and meanings applied to the gender norm in the Istanbul Convention are polarised. In order to reclaim the counter narrative devised by opponents to the Convention, the texts analysed in *Figure 3* reverted to framing the Istanbul Convention as valid and transparent. In doing so, the norm entrepreneurs were framed as “good” with references made to their support of human rights, conflict resolution and the eradication of violence against women (Appendix D, 12, Appendix C, 93-94). In contrast, the anti-gender campaign in Bulgaria was framed as “bad”; the misconceptions espoused regarding gender the Convention were framed as false, users of “gender ideology” as strategy, homophobic and aggressive (Appendix C 23-30, 43-45). However, when we consider the trajectory of the public debate surrounding gender in Bulgaria as outlined in *Figure 1*, there is an inescapable dynamism between opponents and advocates of the Istanbul Convention. Here, opponents and supporters of the Convention revert to framing their counterpart in terms that criticise the others collective identity and in effect, perpetuating a discourse that categorises each perspective in binary terms; “us” and “them”. The supporters of the Istanbul Convention are marked by the opposition for their perceived “moral cosmopolitanism”, where the gender norm they are attempting to introduce is considered incompatible and alien to Bulgarian national context. Furthermore, those within the anti-gender campaign frame themselves as righteous. As *Figure 2* shows, the anti-gender campaigns grievances stem from religious concerns, perceived attacks on Bulgarian national sovereignty and the devaluation of traditional family structures. In this way, they position themselves as defenders of the “natural”, those who are anti-gender are pro heterosexual marriages, in favour of the Bulgarian constitution and consider the definition of gender by biology to be transcendent from God. The processes by which the Istanbul Convention and its gender norm have been framed appears to be in flux as the discursive struggle for the meaning of gender is circulated between agents.

Consider here a further tenant of norm circulation, the suggestion made by Acharya that receptivity to a new international norm will be higher if the responsibility for the creation of that norm is seen to be shared across actors, rather than credited to one source (Acharya 2013, p 467). There is, then, an irony to the actions of Bridget O’Loughlin in her opinion piece on the resistance to the Istanbul Convention in Europe. Though the opinion piece was surely a device by which the Council of Europe hoped to clarify misconceptions surrounding the Convention, it was also a public claiming of the

document by its architects. This in turn centralises the Council of Europe as the source of the Convention, a perception which had already been corrupted by anti-gender campaigns across Europe with the notion that norm entrepreneurs are liberal, European, and excessively interventionist (Graff and Korolczuk 2017; Mayer and Sauer 2017; Kuhar and Paternotte 2017). With this in mind it is difficult to rationalise the position of the Council of Europe who appear to be the archetypes for the theories held in norm diffusion. More specifically, the suggestion made by norm diffusion that while the introduction of norms may provoke initial resistance this is considered futile and illegitimate; ultimately the norm will be adopted (Acharya 2013, 470). The Council of Europe and the Istanbul Convention are guilty of establishing and re-establishing themselves as moral cosmopolitans. To begin, the full title of the Istanbul Convention is, **the Council of Europe's** Convention on preventing and combatting violence against women and domestic violence. In this way the gender norm within the Convention is instantly "othered" because it originates from an external source. The corruption of this narrative by the anti-gender campaign in Bulgaria, as has been demonstrated, is simple and effective; the Convention's conceptualisation of gender is not the same as our own; it is a foreign imposition and must be rejected. O'Loughlin's opinion piece then further re-establishes the moral high ground by repeating the transparency of the Istanbul Convention in terms that relate to its validity as taken from the UN. The fact that the UN considers the Istanbul Convention a "gold standard" simply extends the argument made by anti-gender advocates that foreign powers are engaging within a domestic context that they do not understand.

The reactions of progressive actors to anti-gender mobilisations in Europe has been a source of study for academics in this area. It has been noted that "pro-gender" actors, those who support the conceptualisation of gender as a social construct, have been put into a "gender ideologist" or "genderist" box by anti-gender movements (Kovats 2017, p 175). Collected under this term, the actions of progressives are roundly and easily dismissed as agents of "gender" as an ideology. Responses to this, argues Grzebalska, have sought to target conservative anti-gender campaigns as a problem in and of themselves (Grzebalska 2016). Progressive actors have looked to expose financial and ideological connections to the Catholic church to discredit actors or clarify false claims in order to dissuade supporters (Grzebalska 2016). In a recent policy paper, Kovats, Poim and Tanczos argued that these approaches and the desire to frame anti-gender mobilisations as a "backlash" is a mistake (Kovats, Poim and Tanczos 2015). They note that this leads to inappropriate strategies that simply further the perception of progressive actors as interventionist, foreign powers. Based on these criticisms it appears that the Council of Europe and their advocacy of the Istanbul Convention is a catch-22; as an institution they limited in the ways that they can address the rise of anti-gender

campaigns against the Istanbul Convention. Indeed, the as norm entrepreneurs the Council of Europe is guilty of the criticisms of progressive actors made by academics. Within O'Loughlin's text there is the sense that her tactics towards the rise of anti-gender sentiment is simply to say again, more simply, more slowly, what gender in the Istanbul Convention means. Consider here, "Does that mean our convention opposes traditional gender roles? Of course not" (Appendix D, 20). Having outlined the grievances of the anti-gender campaign it is easy to consider how O'Loughlin's tone could be perceived as patronising. It is futile to simply repeat the meaning of within the Istanbul Convention as it was intended by those who wrote it because these meanings have already been effectively reconstituted and reframed by the anti-gender campaign. Furthermore, in Bulgaria these reconstitutions have already taken effect; major political parties have withdrawn their support of the Convention, the Holy Synod has already rejected ratification and public debate has meant that the Convention is being reviewed by the constitutional court. This analysis of the position of the Council of Europe suggests that their actions are reflective of norm diffusion theory whereby it is expected that the gender equality norm in the Istanbul Convention will be adopted. In reality, as this study has shown, this norm has circulated through multiple agents and processes where its meaning has been stretched.

4.3.2 "Gender Ideology" as the new norm

This study is not the first to criticise the position of international and transnational actors as moral elites who conceptualise and then translate new norms. Zwingel gathered her criticism of this with the description of norm diffusion as "trickle down assumptions" (Zwingel 2016). While Acharya notes that norms are rarely adopted wholesale but are localised and translated to fit each context (Acharya 2013, 467). It is here that norm theorising overlaps with the current analysis of the rise of anti-gender movements in Europe. These anti-gender mobilisations have demonstrated that progress in the pursuit of gender equality has been stagnant, uneven and much easier to reverse than had been anticipated by progressive actors (Grzebalska 2016). Existing analysis of anti-gender movements has argued that anti-genderism is a guise, a Trojan horse masking a threat to liberal democracy in Europe (Grzebalska 2016, Kovats, Poim & Tanczos 2015). This narrative pays heed to Kuhar and Paternotte's interpretative framework, "gender ideology" as strategy with the suggestion that the notion of "gender ideology" is an empty signifier ready to be utilised by a range of actors for a multitude of purposes. While frame analysis of the anti-gender campaign in Bulgaria and actions of key agents has demonstrated that "gender ideology" has been used as strategy in this context, this study argues that norm entrepreneurs must also be considered accountable for the rapacity with

which anti-gender discourse and “gender ideology” has spread. In her interview, Gergana Kutseva argued that there was a fundamental lack of capacity in Bulgarian government with which to comprehend gender equality norms, advocate for the integration into legislation and then operationalise these laws (Appendix E, 236-238). Indeed, when asked to give the primary reason why the Istanbul Convention had not been ratified, Kutseva cited the lack of gender sensitivity and understanding of gender in Government as the main reason the Convention was rejected (Appendix E, 387-390). This lack of capacity could of course be considered in Bulgarian national context where persistent cultural and social traditions align to limit the integration of new concepts such as gender equality. However, the contextual specificities of countries in Europe should not be a surprise to institutional actors such as the Council of Europe. It should be understood that new norms require integration at many levels where norm entrepreneurs support norm agents from grassroots to government. Instead, as the *Figure 3* has shown, the attempted reframing of the anti-gender discourse in Europe against the Istanbul Convention as bad, where the Council of Europe is good, demonstrates an overreliance of norm entrepreneurs to operate in a linear fashion. There is an expectation that as the norm has been included in the Istanbul Convention, signed and ratified by the majority of Council of Europe members that it will inevitably be adopted across the continent. In reality, the rise of organised transnational anti-gender movements in Europe exemplifies that the position taken by norm entrepreneurs in the pursuit of gender equality in the continent has resulted in the poor localisation of gender equality norms.

Poor translation of gender equality norms at within the Bulgaria government has meant that the country had little capacity to support and integrate the gender norm embedded within the Istanbul Convention, as a result the conceptualisation of “gender” as an ideology was quickly and readily adopted by the public. We might consider here Acharya’s suggestion that regions can adopt norms (Acharya 2013, p 470) and when further contextualised with the understanding of anti-gender movements in Europe as a transnational phenomena note that “gender ideology” discourse in Bulgaria is mirrors discourse in other European countries. This suggestion has been touched upon previously in this chapter though it bears repeating. When interviewed, Kutseva argued that the anti-gender counter narrative employed by opponents of the Istanbul Convention in Bulgaria was copied and pasted from other countries in Europe (Appendix E, 313). There are two dynamics to this, the first considers the use of “gender ideology” as strategy. It is not irrational to consider that conservative actors in Bulgaria, such as the Society and Values Association, given their external global affiliations utilised “gender ideology” discourse other countries in order to further their agenda in Bulgaria. In this way, Bulgaria adopted “gender ideology” as a norm as opposed to the

gender norm within the Istanbul Convention. Secondly, moving beyond the conceptualisation of “gender ideology” as strategy we might refer to Kutseva’s earlier critique that Bulgaria was fundamentally lacking in gender sensitive understanding and therefore, expressions of “gender” as an ideology diffused with greater effect. It is difficult to gauge the extent to which Bulgaria’s refusal to ratify the Istanbul Convention can be considered a rejection of the Convention’s gender norm in favour of “gender ideology”. On the one hand it must be acknowledged that following Bulgaria has begun to amend a national law and introduced clauses that are in line with those established in the Istanbul Convention. For example, increasing the number of crisis centres for victims of violence and increasing the financing for such causes (Appendix E, 420-426). Indeed, Kutseva was confident that as these amendments had been integrated, the government would be able to initiate ratifying the Istanbul Convention on the basis that many of its aims have already been applied. In this way, parts of the gender norm in the Istanbul Convention can be seen to have been adopted in Bulgaria. On the other hand, this analysis has already argued that the framing of the Istanbul Convention by anti-gender campaign in Bulgaria has been emotive and effective and quickly acknowledged in the actions of political decision-makers. The analysis of *Figure 2* has demonstrated the use of “gender ideology” as discourse where participants in Bulgaria’s anti-gender campaign mobilised their activism in ways that matched anti-gender movements across Europe. The analysis further touched on the role of external influences such as Russia and the World Congress of Families, we might consider these agents in the same light as the Council of Europe. All three are attempting to agitate for the integration of new concepts in a national context. At this time, we cannot comprehensively conclude that either concept, “gender” as an ideology, or gender as a social construct (as defined in the Istanbul Convention) have been fully adopted in Bulgaria. However, it is clear that “gender ideology” in Bulgaria has limited the adoption of the gender norm within the Istanbul Convention.

5. Conclusion

This study has demonstrated how contested meanings of gender in the Istanbul Convention have circulated in Bulgaria. The attitudes of both supporters and opponents of ratification of the Convention has been captured in the construction of two master frames, *Figure 2* “Gender” in the Istanbul Convention is an ideology” and *Figure 3* “The Istanbul Convention has been misconstrued”. By closely examining how participants in the anti-gender campaign framed the gender norm in the Istanbul Convention this study has outlined the ways in which “gender ideology” as discourse has been utilised. Examples of “gender ideology” transnational discourse were exemplified in the framing of the Istanbul Convention as an European interference which was unconstitutional, and undermined Bulgarian national sovereignty because similar discourse was employed other European anti-gender movements. Furthermore, the concept of “gender ideology” as an “empty signifier” was captured by the master frame devised in *Figure 2* which collated the number of grievances, visual images, symbols, historical and supporting arguments, employed to criminalise and ‘other’ gender in the Convention. The analysis of the documents produced by participants of the anti-gender campaign have been consistently contextualised with the use of the timeline drawn in *Figure 1*. This has enabled this study to conclude the extent to which “gender ideology” in Bulgaria can be considered as strategy. The timings of political statements and actions of key politicians has been discussed in line with their comments on gender and the Istanbul Convention. This analysis has been further reinforced with discussion of similar occurrences in other European countries where anti-gender sentiment is spreading. In this way, the actions of Bulgarian politicians have been critiqued as populist and further discussed in line overlapping of anti-gender, anti-EU, anti-liberal rhetoric espoused by right-wing, conservative politicians. A similar approach has been employed in the exploration of the role of the Bulgarian Orthodox Church in its opposition to the Istanbul Convention. Comparable statements published in Slovakia and Poland were used to contextualise the Holy Synod’s statement. The Holy Synod’s use of “gender ideology” discourse was evident in its rejection of gender as a social construct, the claims made regarding same-sex marriage, the third sex, and destruction of traditional family values. In this light, the actions of the anti-gender campaign were seen employ “gender ideology” as strategy in order to further their own political agendas, defend the heteronormative family or traditional religious teachings. However, the suggestion that “gender ideology” in Bulgaria has been used strategically was questioned as the circulation of the gender norm in the Istanbul Convention was reframed by progressive actors. *Figure 3* captured the attempts of supporters of the Istanbul Convention to reclaim the narrative surrounding the Istanbul Convention. They argued the Istanbul Convention was valid, transparent and had been misconstrued

and sought to refute the claims made by the anti-gender campaign. However, in doing so these progressive actors inadvertently perpetuated claims made by the anti-gender campaign that the Istanbul Convention and its supporters were foreign and excessively interventionist. The continued analysis of the gender norm embedded in the Istanbul Convention and its circulation amongst norm agents led to the understanding that norm entrepreneurs must be held accountable for the poor diffusion of gender equality norms in the country. The interpretative frameworks of “gender ideology” as strategy and “gender ideology” as discourse neglect the fact that if global gender equality norms have been poorly adopted and understood, anti-gender sentiment is likely to be effectively integrated. For now, Bulgaria’s future ratification of the Istanbul Convention remains in the balance as the battle to claim the definitive meaning of gender in the document rages between the promoters of two polarised norms; “gender” is an ideology, and gender is a social construct.

1 Reference List

- Acharya, A., 2013. The R2P and Norm Diffusion: Towards A Framework of Norm Circulation. *Global Responsibility to Protect*. 5 (4).pp.466-479.
- Ackerly, T., and True, B., 2010. *Doing Feminist Research in Political and Social Science*. London: Palgrave Macmillan.
- Associated Press., 2007. Libya frees HIV case medics. In *The Guardian*. [Online] 24th July. Available at: < <https://www.theguardian.com/world/2007/jul/24/libya>>
- BBC, 2013. Bulgaria regrets failing to save thousands of Jews in WWII. *BBC*. [Online] 8th March. Available at: <http://www.bbc.com/news/world-europe-21715518> [Accessed 22nd May 2018]
- Beckwith, K., 2001. Gender Frames and Collective Action: Configurations of Masculinity in the Pittston Coal Strike. *Politics & Society*. 29 (2). Pp.297-330.
- Blee, K. and Taylor, V. 2002. Semi-Structured Interviewing in Social Movement Research. In Klandermans, B. and Staggenborg, S. eds., *Methods of Social Movement Research*. London: University of Minnesota Press. Pp. 92-117.
- Burr, V. 2006. *An Introduction to Social Constructivism*. London: Routledge
- Cheresheva, M., 2018. Convention on Gender Violence Draws Backlash in Bulgaria. In *Balkan Insight*. [Online] 4th Jan. Available from *Balkan Insight's web site* < <http://www.balkaninsight.com/en/article/convention-on-violence-against-women-faces-backlash-in-bulgaria-01-04-2018>> [Accessed 27th March 2018]
- Council of Europe. 2011. *Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence*. Retrieved 2018-04-19 from <https://rm.coe.int/168046031c>
- Gotev, G., 2018a. Istanbul Convention spells trouble for Bulgaria's ruling coalition. In *Euractiv*. [Online] 23rd January. Available from *Euractiv's web site* < <https://www.euractiv.com/section/freedom-of-thought/news/istanbul-convention-spells-trouble-for-bulgarias-ruling-coalition/>> [Accessed 27th March 2018]
- Graff, A. and Korolczuk, E. 2017. "Worse than communism and Nazism put together": War on gender in Poland. In R. Kuhar & D. Paternotte (Eds.), *Anti-gender campaigns in Europe: Mobilising Against Equality*, London: Rowan & Littlefield International.p.175-194.
- Grzebalska, W., 2016. Why the war on "gender ideology" matters-and not just to feminists: Anti-genderism and the crisis of neoliberal democracy. In *Visegrad Insight*. [Online] 7th March. Available at < <http://visegradinsight.eu/why-the-war-on-gender-ideology-matters-and-not-just-to-feminists/>>
- Grzebalska, W., and Soós, E., 2016. *Conservatives vs. the "Culture of Death": How progressives handled the war on "gender"?*. Brussels: FEPS Young Academics Network
- Guidry, J., Kennedy, M. and Zald, M., Globalisations and Social Movements. In Guidry, J., Kennedy, M. and Zald, M., ed., *Globalisations and Social Movements: Culture, Power and the Transnational Public Sphere*.pp.11-44

Holy Synod of the Bulgarian Orthodox Church (2018) *Opinion of the Holy Synod on the Occasion of the Istanbul Convention*. Retrieved 2018-05-05 from <http://bg-patriarshia.bg/news.php?id=254101>

Johnston, H. 2002. Verification and Proof in Frame and Discourse Analysis. In Klandermans, B. and Staggenborg, S. eds., *Methods of Social Movement Research*. London: University of Minnesota Press. Pp.62-91.

Klandermans, B. and Staggenborg, S. 2002. Introduction. In Klandermans, B. and Staggenborg, S. eds., *Methods of Social Movement Research*. London: University of Minnesota Press. Pp.ix-2.

Korolczuk, E., 2014. "The War on Gender" from a Transnational Perspective- Lessons for Feminist Strategising. In Heinrich Boll Foundation, eds., *Anti-Gender Movements on the Rise? Strategising for Gender Equality in Central and Eastern Europe*. Berlin: Heinrich Boll Foundation. Pp.43-53.

Kovats. E., 2017. The Emergence of Powerful Anti-Gender Movements in Europe and the Crisis of Liberal Democracy. In Köttig, M., Bitzan, R. and Petö, A. eds., 2017. *Gender and Far Right Politics in Europe*. [e-book] Palgrave Macmillan. Available through: Aalborg University Library website < <https://link-springer-com.zorac.aub.aau.dk/book/10.1007%2F978-3-319-43533-6>>

Kovats, E. and Peto, A. 2017. Anti-gender discourse in Hungary: A discourse without a movement? In R. Kuhar & D. Paternotte (Eds.), *Anti-gender campaigns in Europe: Mobilising Against Equality*, London: Rowan & Littlefield International. pp.117-132.

Kovats, E., Pöim, M., and Tánczos, J., 2015. *Beyond Gender? Anti-gender mobilisation and the lessons for progressives*. Brussels: Foundation for European Progressive Studies.

Kovats, E., and Poim, A. 2015. *Gender as Symbolic Glue: The Position and Role of Conservative and Far Right Parties in the Anti-Gender Mobilisations in Europe*. Budapest: FEPS and Friedrich-Ebert-Stiftung.

Krook, M., and True, J., 2010. Rethinking the life cycles of international norms: The United Nations and the global promotion of gender equality. *European Journal of International Relations*. 18 (1).pp.103-127.

Kuhar, R. 2015. Playing with Science: Sexual Citizenship and the Roman Catholic Church Counter-Narratives in Slovenia and Croatia. *Women's Studies International Forum*, 49 (1), 84-92.

Kuhar, R. 2017. Changing gender several times a day: The anti-gender movement in Slovenia. In R. Kuhar and D. Paternotte Eds., *Anti-gender campaigns in Europe: Mobilising Against Equality*. London: Rowman & Littlefield International. pp.215-232.

Kuhar, R. and Paternotte, D. eds., 2017. *Anti-Gender Campaigns in Europe: Mobilising Against Inequality*. London: Rowan & Littlefield International

Kuhar, R and Paternotte, D. 2017a. Gender Ideology in movement. In R. Kuhar and D. Paternotte, eds. *Anti-Gender Campaigns in Europe: Mobilising Against Inequality*. London: Rowan & Littlefield. pp.1-23.

Kuhar, R. and Zobec, A. 2017. The Anti-Gender Movement in Europe and the Educational Process in Public Schools. *CEPS Journal*, 7 (2)

Kutseva, G. 2018. An open letter in support of the Istanbul Convention. Retrieved via email from *Bulgarian Fund for Women*.

Kuumba, M. 2002. *Gender and Social Movements*. Oxford: Rowan & Littlefield.

Kretschmer, K. and Meyer, D. 2013. Organising around Gender Identities. In Waylen, G., Celis, K., Kantola, J. and Weldon, S., *The Oxford Handbook of Gender and Politics*. Oxford: Oxford University Press, pp. 390-410.

Leviev-Sawyer, C (2017) "About 2200 migrants and refugees in Bulgaria as at September 2017", *Independent Balkan News Agency*, [Online] 13th September. Available at: < <http://www.balkan.eu.com/about-2200-migrants-and-refugees-in-bulgaria-as-at-september-2017-official/>> [Accessed 21st May 2018]

Levitt, P. 2015. Constructing Gender Across Borders: A Transnational Approach. In Ngan-Ling Chow, E., Segal, M., and Tan, L. eds. *Analysing Gender, Intersectionality, and Multiple Inequalities: Global, Transnational and Local Contexts*. 15, pp.163-183.

Lombardo, E., Meier, P. and Verloo, M., eds., 2009. *The Discursive Politics of Gender Equality*. New York: Routledge.

Mayer, S. and Sauer, B. 2017. "Gender ideology" in Austria: Coalitions around an empty signifier. In R. Kuhar and D. Paternotte Eds., *Anti-gender campaigns in Europe: Mobilising Against Equality*. London: Rowman & Littlefield International. Pp.23-40.

Marcus, I , 2018. "Bulgaria: Holy Synod, socialists and radical against Istanbul Convention" in *The Sofia Globe*. [Online] 23rd January. Available from *The Sofia Globe's web site* < <https://sofiaglobe.com/2018/01/23/bulgaria-holy-synod-socialists-and-radicals-against-istanbul-convention/>> [Accessed 27th March 2018]

Meyer, D., 2002. Opportunities and Identities: Bridge-Building in the Study of Social Movements. In Meyer, D., Whittier, N. and Robnett, B., eds., *Social Movements: Identity, Culture and the State*, Oxford University Press: Oxford

Moss, K. Russia as the saviour of European civilization: Gender and the geopolitics of traditional values. In R. Kuhar and D. Paternotte Eds., *Anti-gender campaigns in Europe: Mobilising Against Equality*. London: Rowman & Littlefield International. pp.195-214.

Necsutu, M. 2018. "Moldova to Host Global Christian Right-Wing Congress" in *Balkan Insight*. [Online] 23rd January. Available at: <http://www.balkaninsight.com/en/article/moldova-to-host-world-congress-of-families-before-elections-01-23-2018> [Accessed 29th May 2018]

Neuburger, M., 2013. *Balkan Smoke: Tobacco and the Making of Modern Bulgaria*. London: Cornell University Press.

Nuse, I., 2018. "Protests mount against Norwegian Child Welfare Service" in *Science Nordic*. [Online] 10th February. Available at: <http://sciencenordic.com/protests-mount-against-norwegian-child-welfare-service> [Accessed 22nd May 2018]

O'Loughlin, B. 2018. "Istanbul Convention: Clearing away the fog of misconceptions" in *EU Observer*. [Online] 8th March. Available from *EU Observer web site* < <https://euobserver.com/opinion/141235> > [Accessed 27th March 2018]

Pavlic, V (2018) "Croatia Divided over Ratification of Istanbul Convention" in *Total Croatia News*. [Online] 21st January. Available from *Total Croatia News's web site* < <https://www.total-croatia-news.com/politics/24718-croatia-divided-over-ratification-of-istanbul-convention> >

Peto, A. 2016. How are Anti-Gender Movements Changing Gender Studies as a Profession?. *Religion & Gender*, 6 (2)

Ryan, C, 1991. *Prime Time Activism*. Boston: South End Press.

Society and Values Association. 2018a. *Society and Values Association: Our Mission*. Retrieved 2018-04-18 from <http://www.sva.bg/about-us.html>

Society and Values Association. 2018b. Open letter to reject the Istanbul Convention. Retrieved, <http://www.sva.bg/104510741088108610871072/-30>

Southern Poverty Law Centre. 2017. "World Congress of Families" *Southern Poverty Law Centre* [Online]. Available at: <https://www.splcenter.org/fighting-hate/extremist-files/group/world-congress-families> [Accessed 29th May 2018]

Snow, A. and Trom, D. 2002. The Case Study and the Study of Social Movements. In Klandermans, B. and Staggenborg, S. eds., *Methods of Social Movement Research*. London: University of Minnesota Press. Pp.146-172.

Staggenborg, S., 1998. *Gender, Family and Social Movements*. Pine Forge Press: California.

Staggenborg, S., 2002. The "Meso" in Social Movement Research. In Meyer, D., Whittier, N. and Robnett, B., eds., *Social Movements: Identity, Culture and the State*. Oxford University Press: Oxford

The Journal, 2017. "They've escaped from Aleppo, but the 60,000 Syrian refugees living in Bulgaria still feel far from welcome" *The Journal* [Online]. Available at: <<http://www.thejournal.ie/bulgaria-syrian-refugees-3565372-Aug2017/>> [Accessed 21st May 2018]

UNHCR, 2017. *UNHCR's recommendations to the Republic of Bulgaria for its Presidency of the Council of the European Union (EU) A Time for Solidarity*. [Online] December 2017. Available at: < <http://www.refworld.org/docid/5a33c40f4.html> > [Accessed 22nd May 2018]

Whewell, T., 2016. "Norway's Barnevernet: They took our four children...then the baby" *BBC*. [Online] 14th April. Available at: <http://www.bbc.com/news/magazine-36026458> [Accessed 22nd May 2018]

Whittier, N., 2002. Meaning and Structure in Social Movements. In Meyer, D., Whittier, N. and Robnett, B., eds., *Social Movements: Identity, Culture and the State*. Oxford University Press: Oxford

Williams, R. 2002. From the "Beloved Community" to "Family Values": Religious Language, Symbolic Repertoires, and Democratic Culture. In Meyer, D., Whittier, N. and Robnett, B., eds., *Social Movements: Identity, Culture and the State*. Oxford University Press: Oxford

Zwingel, S., 2016. *Translating International Women's Rights: The CEDAW Convention in Context*. London: Palgrave Macmillan.

Appendix A- Open letter to reject the Istanbul Convention

Dear Ladies and Gentlemen,

We appeal to you in connection with the decision of the Ministry of Foreign Affairs and the Ministry of Justice to legalize, through the forthcoming vote in the National Assembly, the Council of Europe Convention on the Prevention and Combating of Violence Against Women and Domestic Violence, also known as the Istanbul Convention. The Istanbul Convention contains provisions containing serious risks and adverse consequences for the rights of women, parents and children, marriage and the family, freedom of religion, national policies on these issues, as well as internal security and refugee policies.

The Istanbul Convention introduces, for the first time, a gender and gender identity definition independent of the biological sex of the person established in international law. In Art. 3c says: "gender means socially rooted behaviours, behaviours, activities and characteristics that a particular society sees fit for women and men;" (2) The adoption of the Istanbul Convention will lead to the study of "non-stereotyped gender roles ... in formal curricula at all levels of education, from kindergarten to universities. (Article 14 (1)) It will deprive parents of their right to educate their children in accordance with their moral and religious beliefs.

It will lead to policies that allow boys and men who consider themselves women to use toilets, baths and changing rooms designed for women, incl. in public schools (3). The Convention aims to eliminate any "tradition based on stereotyped roles of gender". The dual view of mankind (male-female), incl. and marriage can be described as a 'tradition based on stereotypical gender roles' in curricula. (Chapter 3, Article 12, paragraph 1) If the Istanbul Convention is ratified, it will open a door for the legalization of same-sex marriages in Bulgaria, recognizing the right to gender identity of one of the patrons.

Introducing a gender and gender identity definition that is independent of the person's biological gender will result in grossly damaging the rights of parents and family. Parents will be able to be charged with violence against their daughter if she wishes to treat her as a boy and they refuse. The Istanbul Convention will violate the duty of therapists, specialists and clergy to preserve the confidentiality of the shared. (Article 4, Article 28)

Another serious negative consequence of gender redefinition is that of men who consider themselves to be women who are increasingly appearing among female athletes and dominate in lifting, running, fighting, cycling, American football, basketball, mixed martial arts and more. "Winners" like Laurel Hubbard, Fallon Fox, Gillian Birdon are examples of this (4).

The vote in the Istanbul Convention will oblige Bulgaria to grant refugee status to any foreigner who is being persecuted in the homeland because of "gender specificities". Chief Assist. 7 Art. Article 60 (2)

The Istanbul Convention provides for the establishment of a large-scale mechanism (GREVIO) to monitor the implementation of the Convention. It could undermine the national competence and the exclusive position of the EU Court to review the legality of EU acts. (Chapters 9, 66-68) Today, violence against women and domestic violence constitute a crime in all Member States of the European Union. At present, 11 of the member states of the European Union and 19 of the member states of the Council of Europe have NOT RATIFIED (5). Many of them express concerns about the potential future legal interpretation of the texts included in it.

42 If society loses the ability to make a difference between women and men, the fight against violence
43 against women remains only a formal commitment. This, in the long run, not only does not help
44 women but also turns against them and makes them victims of violence and injustice. Bulgaria may
45 and must refuse the ratification of the Convention on the example of Croatia, Slovakia, Hungary and
46 a number of other European countries that have done so after signing it.

47 Dear Ladies and Gentlemen,

48 In view of the above problematic aspects, we appeal to you to: To reject the ratification of the
49 Istanbul Convention in Bulgaria. Give your official opinion on the arguments raised in this letter. To
50 organize and conduct a wide public debate on the issue with adequate media coverage and to
51 familiarize the Bulgarian public with the consequences of gender redefinition in the countries that
52 have already done so.

53 To reject the ratification of the Istanbul Convention in Bulgaria. Give your official opinion on the
54 arguments raised in this letter. To organize and conduct a wide public debate on the issue with
55 adequate media coverage and to familiarize the Bulgarian public with the consequences of gender
56 redefinition in the countries that have already done so. Take the necessary steps to strengthen the
57 current legislation in Bulgaria for the prevention and protection of women against violence and
58 domestic violence.

59 As parents and citizens representing different non-governmental organizations, advocating the
60 protection of the dignity and rights of women, children and parents, marriage and family, we are
61 against the ratification of the Istanbul Convention and insist that you comply with our demands.

62 Otherwise, we will call on every citizen interested in development, education and future to
63 withdraw your support to you as the rulers of the upcoming local elections and to take active civil
64 action through mass protests, letters and petiti

Appendix B- The Opinion of the Holy Synod on the Occasion of the Istanbul Convention

Opinion of the Holy Synod of the Bulgarian Orthodox Church -Bulgarian Patriarchy on the Council of Europe Convention on the Prevention of and Fight against Violence Against Women and Domestic Violence Taken Public Use as an Istanbul Convention

The Holy Synod of BOC - BP, based on the biblical truth: " So God created man in his own image; in the image of God he created them; male and female he created them"(Genesis 1:27), as an expression of the Orthodox Christians who make up the vast majority of Bulgarian citizens, respecting the constitutional principle of non-discrimination based on sex, as well as the established norms of international law on equal treatment of men and women supports the efforts of the international and European institutions as well as the state authorities in the Republic of Bulgaria to protect women from all forms of violence, states that it is opposed to the introduction, through the Istanbul Convention, of concepts incompatible with the Bulgarian public order that are unknown in our national legal system, as well as the passing of ideas incompatible with the faith of the Holy Orthodox Church.

The very fact that the Istanbul Convention raises disputes in Bulgarian society about the concepts it introduces is alarming.

There is no explanation and unacceptable that an international treaty that gives rise to a definite public disagreement, to be submitted to the National Assembly for discussion and ratification without the "Explanatory Report" because it is a source of interpretation of the legislator's will.

The subject matter of the Convention is on matters of public importance and public consultation should take place before the signing of the Convention and not in the final phase of the legislative process when it is proposed for ratification.

The Bulgarian Parliament, with its position on the Istanbul Convention, will give a clear signal whether it is listening to the people's voice or other voices. And whether it protects theories, a product of social engineering, and which affect the foundation of society - man, his faith, family and moral values.

The BOC-BP Synod, motivated by this principled position, is undoubtedly concerned that the Istanbul Convention transcends the proclaimed goals based on the following:

1. It is clear that the great problem of the Istanbul Convention is not its translation into Bulgarian, but its meaning. According to Art. 81, last paragraph of the Convention, only the English and French texts are authentic. Therefore, in the interpretation and application of the Convention, the Bulgarian translation (good or bad) is not valid - an argument for this is also contained in Art. 33 of the Vienna Convention on the Law of Treaties. The monitoring of Bulgaria will be carried out in accordance with the authentic text. It should be remembered that the Bulgarian text of an international treaty is promulgated in the State Gazette under the rules of Art. 25 of the International Treaties Act in the Republic of Bulgaria.

In the authentic text of the Convention, gender is genuinely distinguished from the concept of sex as a new, different concept unknown in the Bulgarian legal order. This alone is sufficient for disagreement. Gender can only be biologically determined because man and woman are God's creation.

2. In Art. 3 "Definitions" in b. "C" defines the term "gender" for the purposes of the Convention "gender" means the social roles, behaviours, activities and characteristics that a particular society considers to be appropriate for women and men. "

2.1. It is logical that the definitions in an international treaty or in law as to the terms used in them are the key to the interpretation of their content. Obviously, the definition refers to gender other than biological, because the latter does not need a legal definition.

2.2. It does not need to comment on the frequency of the use of the terms "gender" and "sex" in the Convention, a fact indicative in itself to suggest the true meaning of the Convention and what it pursues, beyond the noble goals of protecting women from violence and domestic violence. This is precisely the frequency of use of the term "gender" that determines the need for a definition in Art. 3, b. "In" the term "gender", ie "gender" in the authentic text, which is statistically expressed in the following:

- In the Convention, the term "gender" and its derivatives has been used 25 times (of which 4 times in the preamble), and the term "sex" and its derivatives has been used 19 times; significantly less than the defined gender concept, and in the Bulgarian version only "sex" is used;
- The joint use of the two concepts is contained in Art. 3, b. "C" and art. 4, 53; the preamble records "sexual violence and the potential for increased gender-based violence"; "Sexual Violence" and "Sexual Orientation Violence".
- In the "Explanatory Report" to the Convention: the term "gender" and its derivatives is used 126 times, and the term "sex" and its derivatives is used 89 times.

3. The existence of a definition of "gender" or "(gender)" in the authentic text in a definitive norm in an international treaty or in national law, even without discussing its content, is in itself a problem and raises a strong objection because the gender is biologically determined - man and woman, not a matter of self-determination. The BOC does not accept the legalization of categories such as "gender", "gender identity", gender as "socially rooted", "gender", "non-stereotyped gender roles"

4. In the systematic, logical and teleological interpretation of the Convention and its title, it becomes extremely clear that the subject of protection is women and girls, that is, one of the two sexes found. In this sense, the existence of this definition of "gender" or "gender" in the authentic text is contrary to the title of the Convention and is out of context unless it seeks to extend the scope of protection, as is the case here. Or, in general, the subject range of protection through the concept (gender) also includes persons who are defined by a different sex than the biological one, not just women and girls.

5. A definition of (gender) is not contained in any of the international treaties and acts listed in the preamble to the Istanbul Convention. In our national legislation no definition of "gender" is defined, nor are the terms "man" and "woman" defined.

It is unconvincing to assert that the term "third sex" is not introduced in the Convention because gender content in the authentic text of the Convention contains content other than the two biological sexes, although this is not explicitly described as " third sex ". It is incorrect to claim that the concept of "gender" or "gender" in the authentic text is used only for the purposes of the Convention, as there are a number of obligations to amend national legislation in its implementation mechanisms. According to Art. 5, para. 4 of the Constitution have international treaties with national law if they contradict them. The laws should be in line with the Constitution, which would necessarily lead to constitutional changes. The Bulgarian Constitution is clear on the principle of non-

discrimination, including on the basis of gender. According to Art. 6, para. (2) All citizens are equal before the law. No restrictions on rights or privileges based on race, nationality, ethnicity, gender, background, religion, education, belief, political affiliation, personal and social status or property status. The question remains about how the constitutional concept of gender and the concept of sex under the Convention is reconciled, as the text has been submitted in Bulgarian to the National Assembly.

6. Worrying the expressions used to take measures to eradicate customs and traditions related to "stereotyped roles for men and women" (Article 12, paragraph 1 of the Convention).

7. Art. 4. Article 3 of the Convention states: "The implementation of the provisions of this Convention by the Parties, in particular measures to protect the rights of victims, shall be secured without discrimination on any ground such as sex, gender, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, sexual orientation, gender identity, age, state of health, disability, marital status, migrant or refugee status, or other status." There is no doubt that this norm is not necessary because the provision is categorical - there is gender and social sex - sex and gender.

8. Therefore, Art. 6⁵ of the Convention does not oblige states to apply "gender-based policies", as the Bulgarian translation says, but to apply gender policy, as the authentic text says. Undoubtedly for St. It is a synod that these two provisions - Art. 4 (3) and Art. Article 6 of the Convention provides for its full application in national law. Reservations and declarations thereto are ineligible for the purposes of the Convention.

9. Point 53 of the "Explanatory Report" of the Convention makes it clear which groups of people are included in the scope of protection - "Certain groups of individuals may also experience discrimination on the basis of their gender identity, which in simple terms means that the gender they identify with is not in conformity with the sex assigned to them at birth. This includes categories of individuals such as transgender or transsexual persons, cross-dressers, transvestites and other groups of persons that do not correspond to what society has established as belonging to "male" or "female" categories."

10. In the European Parliament resolution of 12 September 2017 on the proposal for a Council decision on the conclusion, by the European Union, of the Council of Europe Convention on the Prevention of the Elimination of Domestic Violence and Combating Violence against Women (COM (2016) 0109-2016 / 0062 (NLE) says:

- "I." - whereas measures must be taken to tackle the emerging phenomenon of online gender-based violence, including abusive attitudes, harassment and threats, especially of young women and girls and LGBTI people;
- "C" whereas some groups of women, such as migrant women, refugee and asylum seekers, women and girls with disabilities, LTIW women and Roma women, are at risk of multiple discrimination and are therefore even more vulnerable to violence, motivated by sexism, together with racism, xenophobia, homophobia, transphobia or intersex-phobia, as well as discrimination based on age, disability, ethnic origin or religion.

⁵ "Article 6- Gender-sensitive policies

Parties shall undertake to include a gender perspective in the implementation and evaluation of the impact of the provisions of this Convention and to promote and effectively implement policies of equality between women and men and the empowerment of women." (Council of Europe 2011

121 It is clear from these resolutions that for the European Parliament of the European Union, not only
122 LBT women, but all LGBTI individuals are subjects of Convention protection and therefore it cannot be
123 said that this category of persons are not included in the Istanbul Convention.

124 11. We are disturbed by the content of Art. Article 12 of the Convention, which requires States Parties
125 to take measures to include in the curriculum "teaching material on issues such as equality between
126 women and men, non-stereotyped roles of gender" and the philosophy embodied in Art. 14 of the
127 Convention on the promotion of changes in social and cultural models of behaviour of women and
128 men in order to eliminate prejudices, customs, traditions and any other practices based on the
129 undermining of women or stereotype roles for women and men.

130 12. It is clear that Art. 78 "Reserves" of the Convention in its scope do not include the commented
131 controversial texts except to make a reservation against the article itself. 78, which is essentially
132 impossible.

133 13. As regards the proposals to adopt an interpretative statement by the Bulgarian Parliament, it
134 should be noted that such were made by Poland, Lithuania and Latvia at the time of the signing of the
135 Convention and by Poland at the time of its ratification. On the ratification of Poland, Switzerland,
136 Austria, the Netherlands, Sweden, Norway, Finland, that the interpretative statement of Poland is, in
137 substance, a reservation to the Convention which is unacceptable under Art. 78, i. this statement is
138 not recognized. In international treaty law, interpretative declarations have no legal force and cannot
139 oppose the relevant international treaty unless expressly provided for.

140 14. The Convention itself makes it possible in principle to amend it on the basis of Article 72, but this
141 is practically difficult to implement.

142 Dear Members of the Parliament,

143 Every power is from God and in society there must be an agreement that is for the welfare of the
144 Bulgarian people and is in harmony with the motto of the Bulgarian presidency of the European Union
145 - Unity makes the power. St. Synod does not support the Convention because of the obligation to take
146 legislative and other measures on the part of states to introduce concepts and principles contrary to
147 public and legal order and moral values. Bulgaria has national laws that provide protection against
148 violence at all, including domestic violence. Led by the above and concerned about the future of our
149 people as its spiritual archpastors, we call upon the National Assembly to listen to the voice of the
150 people and not to ratify the Istanbul Convention, which introduces concepts that are in sharp
151 contradiction to our Orthodox faith, national traditions and legal system. Sacred Fatherland Debt of
152 St. The Synod of the Bulgarian Orthodox Church - the Bulgarian Patriarchate, is to remind God's people
153 of the words of St. Bible: Woe to those who call good evil and good evil, darkness consider light, and
154 light for darkness, bitter as sweet, and sweet for bitter! "(Isaiah 5:20).

Appendix C- Open letter in support of the Istanbul Convention

Dear colleagues,

We are contacting you on behalf of a group of concerned civil society organizations in regard to the process of ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence (the so-called Istanbul Convention) in Bulgaria. As you may be aware, the Convention has become a highly contentious topic in the Bulgarian political and social environment since the beginning of this year. We are extremely concerned with the direction that the debate has taken and the real risks that exist for the Bulgarian Parliament to reject the Convention's ratification.

Although, following the signature of the Convention on 21 April 2016, the Ministry of Justice had taken a lead in drafting the amendments to the national laws aiming to bring it in line with the Convention, the government has neither initiated a public debate nor carried out an information campaign about this crucial document.

The Government decided to submit the Convention for ratification to the Parliament on 3 January 2018. The decision was taken by a small majority since the junior coalition partner – the United Patriots, itself a coalition of nationalist parties of a neototalitarian nature – had voted against the ratification. In addition to the four ministers the United Patriots have in the 21-members' government, a further four ministers from the ruling party Citizens for European Development of Bulgaria (GERB) (Minister of Finances, Minister of Transport, Minister of Health and the Minister of Education and Science) voted against the Convention. This sparked a massive and heated public debate in the country, which has been continuing over the past month and has now taken a very worrying turn, which provoked us to contact you with this letter. The President of Bulgaria has now also joined in the anti-Convention campaign and expressed views that repeat the poisonous rhetoric described below.

The opponents of the Convention have carried out an **organised anti-campaign** aiming to discredit the Convention and prevent its ratification. The campaign, while claiming to support in principle the need to combat violence against women, has propagated a stream of lies and false propositions, through which the public debate around the Convention has become **toxic**. The focus was successfully shifted from the prevention and combating violence against women to the issue of "gender" and whether this supposedly new term for the Bulgarian context (as distinct from the term "sex" and translated as "social sex" in Bulgarian due to the lack of a term "gender") would bring about a breakdown of so called 'traditional family values'.

Opponents have claimed that the Convention will lead to the recognition of a "third sex", same-sex marriages, and rights for transsexuals and freedom for everybody to choose their own sex. Some frankly absurd claims have been made and disseminated widely by the media, such as that the Convention would allow men who freely define their sex to go into women's bathrooms, or enable male athletes to compete in women's races. The issue of gender-sensitive education for children has also proved particularly contentious. Pointing out the real meaning of the terms "gender" and the fact that such matters are not in any way or form objects of the Convention, has been dismissed. Nor have the arguments related to the need for children to learn about gender stereotyping and the prevention of gender-based violence from an early age been heard or considered. The campaign involved strong homophobic overtones, reaching at some point virulent public incitement to hatred, discrimination and violence against LGBTI+ persons.

The opponents of the Convention include organisations such as the "Society and Values Association", member of the World Congress of Families, which has been espousing strongly anti-EU and

44 homophobic views and opposed the core European values of equality, diversity and tolerance. Hate
45 speech by this group, as well as others, has been hugely influential in the Bulgarian media and political
46 discourse related to the Istanbul Convention. The Bulgarian Orthodox Church and several other
47 religious denominations have issued statements opposing the ratification of the Convention as well.
48 They all outline their concern for the preservation of the family and “traditional values”, and the fact
49 that violence against women is a massive reason for family breakdown seems to be irrelevant to this
50 argument. In the statement of the Bulgarian Orthodox Church there was also homophobic incitement.

51 We have two significant concerns. **The first one** is that the debate shifted from the gender-based
52 violence and its effective combat, to populist debate related to anti – LGBTI+ rights and against same
53 sex marriage. The last initiative in this direction are the proposal to hold a referendum against same
54 sex marriages by the Vice Prime Minister Karakachanov and to ban civil registration of transgender
55 persons by the Minister of Regional Development – Nankov. Moreover, this debate started to push
56 for more anti-European stigmatization and feelings leading to hate speech, threats and attacks to
57 some NGOs and activists.

58 **The second** issue, which also bothers us is the powerful voices discrediting the civic participation, free
59 speech and the role of the NGOs that started to appear in the debate. The civic organizations are
60 blamed as foreign agents, stigmatized because they protect the rights of different groups (like
61 women’s rights, LGBTI+, refugees, etc.), and this is an official position of some state institutions (The
62 President of the Republic) and key political parties, part of the EU Parliament.

63 We are extremely concerned that this rhetoric has become part of the discourse of major political
64 parties and the government has not done enough to counteract this.

65 It is also concerning us that GERB has only half-heartedly defended the Convention in the public space
66 and in response to the above-described campaign. It seems that there is a disagreement within the
67 party itself as to whether the Convention should be ratified as evidenced by the fact that four GERB
68 ministers voted against ratification and some PMs had made statements that the Convention should
69 not be signed. More recently, GERB has decided to ask the Constitutional Court whether the
70 Convention is in contradiction with the Bulgarian Constitution, the mere consideration of which is
71 manifestly absurd. This will lead to delays within the Parliament, which are putting at a massive risk
72 the Convention’s ratification. We are also dismayed by the fact that the Bulgarian Socialist Party (BSP),
73 a member of the Party of European Socialists, has opposed the ratification of the Convention. The
74 party has announced that it is against the ratification and has introduced a draft bill to Parliament,
75 which calls for a nationwide referendum on this issue. This is a manifestly absurd and populist move,
76 which is designed to delay or remove altogether the possibility for the Convention’s ratification,
77 contrary to all the values the BSP and PES have stood for in the past.

78 The European Union is based on a strong commitment to promoting and protecting human rights,
79 democracy and the rule of law worldwide. Human rights are at the very heart of EU relations with
80 other countries and regions. Promoting human rights work can help to prevent and resolve conflicts
81 and violence.

82 With this regard, we are calling upon the EU Parliament, the Commission and all interested third
83 parties to stress the importance of eliminating misconceptions about this Convention in public
84 discourse in Bulgaria, in particular concerning the use of the term “gender” which myths should be
85 stopped immediately. Some of the opponents of the Convention may acknowledge that violence
86 against women is a problem, but wish to prevent governments from challenging traditional gender
87 roles and stereotypes, due to a cultural affirmation that men and women should play very different
88 roles in public life and within the family. This approach limits women to the stereotypical role of

89 mothers, giving birth and staying at home to rear children. The critics go as far as to argue that the
90 Convention would endanger societies based on traditional families. This is a false argument because
91 all the measures provided for by the Istanbul Convention reinforce family foundations and links by
92 preventing and combating the main cause of destruction of families, that is, violence.

93 We believe the Convention is all about preventing violence against women and domestic violence,
94 protecting the victims and prosecuting the perpetrators. It has no other hidden agenda. We therefore
95 call upon the EU institutions and responsible political parties, as well as all our international partners,
96 to make public statements regarding the wrong discourse of the debate in Bulgaria and to state their
97 public support for the Convention and its ratification by all EU countries and by the European Union
98 itself, as a legal entity. We hope you can urge the Bulgarian Parliament to ratify the Convention as
99 soon as possible and all Bulgarian institutions to promote non-hostile *environments free* from hate-
100 speech and discrimination and respecting human rights and the rule of law.

101 The fact that all of this is happening during the first ever Bulgarian Presidency of the Council of the
102 European Union – in blind denial of core European values – is all the more concerning. More than 200
103 Bulgarian organisations, as well as more than 300 leading academics and experts have voiced their
104 support for the Convention. But our voices are being drowned by the toxic public debate and we
105 perceive that there are real risks now that Bulgaria will become the first country to reject the
106 ratification of the Istanbul Convention. This is surely going to have repercussions beyond our borders
107 and encourage opponents of the Convention in other countries to carry out smear campaigns too.
108 This will be a huge blow to victims of violence across Europe and we would like to call on you to
109 support us in preventing this!

110 Sincerely,

111 Bulgarian Fund for Women

112 And a Coalition of nearly 200 NGOs (the full list is [available here](#))

Appendix D-Bridget O'Loughlin, "Istanbul Convention: Clearing away the fog of misconceptions"

- 1 STRASBOURG, 8. MAR, 08:53
2 As we mark International Women's Day, we notice with some dismay that several Council of Europe
3 member states are showing 'cold feet' in moves to ratify the Council of Europe's convention on
4 preventing and combating violence against women and domestic violence (more commonly known
5 as the Istanbul Convention). Almost every single member of the Council of Europe has signed the
6 treaty. As of this writing, 28 have ratified it.
- 7 But recent misconceptions about its purpose as 'ideologically biased'" or against 'traditional family
8 values' are spreading like fog in some countries.
- 9 This fog needs to be cleared because the stakes are too high.
- 10 Our treaty – considered a gold standard by the UN – provides essential tools to uphold the basic
11 human right of women to live a life free from violence.
- 12 It forces no 'gender ideology' on states. It does differentiate between the terms 'sex' and 'gender'.
- 13 Sex refers to biological characteristics that define humans as female and male, while gender
14 encapsulates socially constructed roles, behaviours, and activities that a given society considers
15 appropriate for men and women.
- 16 Thus, gender refers to expected roles for women and men – and how too often these roles are
17 defined by out-dated stereotypes that can make violence against women, intimidation and fear
18 more 'acceptable'.
- 19 Does that mean that our convention opposes traditional gender roles? Of course not.
- 20 If women want to be stay-at-home mothers while their husbands work, the convention raises no
21 objection: it was never designed to force women or men to live in certain ways.
- 22 The education that the convention does require is to end stereotypes based on the idea that women
23 are inferior to men – and that it is okay for them to be beaten.
- 24 For instance, Article 14 of the convention requires states to include teaching material on non-
25 stereotyped gender roles in formal curricula and to empower girls and boys to pursue options in life
26 not limited to traditional roles for men (for example solely as breadwinners) and for women (solely
27 as mothers and carers).
- 28 We must refute other related misconceptions that thicken the fog.
- 29 For example, the education obligation does not imply that states should include teaching material on
30 sexual orientation and gender identity.

31 A common misconception is that the Istanbul Convention obliges states to have lessons at schools
32 about sexual orientation. It does not.

33 Some claim that our convention promotes same-sex marriage, but it makes no reference to the legal
34 recognition of such marriage. Certainly the Council of Europe supports LGBTI rights. The convention
35 opposes any form of discrimination. But the subject of same-sex marriage is outside the legal scope
36 of the Istanbul Convention.

37 Nor does the convention oblige states to legally recognise a third sex under domestic law, as some
38 people mistakenly believe.

39 The term "third sex" – sometimes referred to as third gender or intersex – refers to people who do
40 not identify as either male or female.

41 Yet another misconception is that the convention calls for a new "refugee status" for transgender or
42 intersex persons, as has been sometimes erroneously reported. This is not true, either.

43 It asks for asylum procedures to be carried out in a way that allows women to explain the reasons
44 why they are fleeing.

45 Whether this is because of rape to silence political expression, or because of the fear of being
46 subjected to female genital mutilation, it takes time to say so.

47 All the convention wants in this regard is to offer the space to women to open up, because their
48 stories and experiences might qualify for refugee status under the 1951 convention relating to the
49 status of refugees.

Appendix E- Interview with Gergana Kutseva, Director of Development and Communications for the Bulgarian Fund for Women

Interview conducted 11th May 2018, Sofia, Bulgaria.

Transcript:

- Isobel Squire

1 So um I hope the interview won't take much longer than half an hour or so um I. The reason I came
2 to speak to you is because I am researching anti-gender campaigns across Europe specifically in
3 Bulgaria as to why the government chose not to ratify the Istanbul Convention.

- Isobel Squire

4 So can I start by asking your name?

- Gergana Kutseva

5 Gergana Kutseva.

- Isobel Squire

6 And your job title here?

- Gergana Kutseva

7 I am director of Development and Communications

- Isobel Squire

8 And could you tell me a little bit about what the Bulgarian Gender Fund does? What's your work
9 here?

- Gergana Kutseva

10 its Bulgarian Fund for Women is the proper name of the organisation. It was established in 2004 in
11 answer to the withdrawal of many international donors to other places in the globe because our pre
12 acceptance period with the EU started and more or less it was uh, people think that we are already
13 a developed country with the developed civil societies so there is no need to fund anymore in the
14 sector. Actually this the debate and the situation with the Istanbul Convention in the last three
15 months actually proved that wrong because it is obvious now that we are lacking feminist
16 movement in Bulgaria. We don't have grassroots organisations, like ordinary people who are ready
17 to be involved in collective action to defend freedoms. So back to our organisation, it worked for
18 already, it's working already thirteen years and in 2015 it was totally restructured, re-strategised
19 with a new plan and completely new team and it is when I, and the now Executive Director came. So
20 we lead this process and today I may say that we are already well established for three years its part
21 of the civil society sector. Um and we are also the only donor in Bulgaria for women's rights who
22 supports projects on gender equality there are no state funding for this except for small, small funds
23 dedicated to service providers for domestic- victims of domestic violence. And that's why we mostly
24 fundraise from international organizations and corporations. Individual giving culture in Bulgaria is
25 so much lacking, less than 10 per cent of Bulgarians give and they usually give two cases of
26 emergency like natural disasters or saving peoples lives but never for social impact change and
27 supporting organisations and so on. Anything else about this?

- Isobel Squire

28 No that's great that's really interesting and I'll move on just talk a bit more specifically about the
29 Istanbul Convention. I'm aware that you have been here and obviously the work that you're doing
30 here is very closely linked to what is in the Istanbul Convention, so I wanted to start by asking in your

31 opinion who do you think were the main actors in Bulgaria working against the Convention being
32 ratified?

- Gergana Kutseva

33 According to our research, an investigation actually, it proved to be an organisation called Society
34 and Values. Who is a member of the International Congress of Families, I guess you know?

- Isobel Squire

35 Yeah.

- Gergana Kutseva

36 But this organization is about, after we announced its affiliation publicly they remove their
37 membership from the Family of Congress here. But as I have send you, probably you followed maybe
38 I am not sure if everything was that inside the documents but there are actually formed by religious
39 organizations, religious sects, I might say. Although in Bulgaria their work is legitimate but they are
40 more or less evangelical churches and pastor churches which are very conservative. But also were
41 investigated in terms of like cheating for money

- Isobel Squire

42 Corruption?

- Gergana Kutseva

43 Something like this, yeah but it was early in the nineties and later they restructured they became a
44 civil society organisation; they are not openly religious and as such they formed this Values and
45 Society. There is another organisation called (Bulgarian Name) in Bulgarian which is like, "Talk for
46 Life", "Words for Life" something like that. Ah which is previous name of the church was "Choice of
47 Life". The names church, the name of the church was "Choice of Life" and now they are "Words of
48 Life"⁶ or something like that. And you can imagine from this name what they are working on.
49 They're against abortion and they started to raise this question in Bulgaria where we never had this
50 discussions. I mean that we have always been allowed to have, uh, abortion; like free abortion, free
51 and safe abortions back from the socialist past. It is like a right which we inherited but we never
52 fight, fought for. We as a feminist organisation are actually afraid that they might raise the question
53 and that the society as we saw with the Convention is not ready to defend this. So we are now
54 thinking of the ways to work on this is in order to prevent. So this organisation members of this
55 organization Society and Values, one of the members is called Alexander, it was on my mind its okay
56 I'm going to -Urumov, Alexander Urumov.

- Isobel Squire

57 Okay, could you write that, sorry?

- Gergana Kutseva

58 Yes

- Isobel Squire

59 Okay, thank you.

- Gergana Kutseva

⁶ Organisation called Word of Life
<https://give.wol.org/location/bulgaria>

60 And uh, he is part of the churches, these religious churches; pastor, evangelistic. There are many
61 there but to be honest I'm not an expert.

- Isobel Squire

62 Are they under the Bulgarian Orthodox Church or is that separate?

- Gergana Kutseva

63 No no, they are like the evangelic, they are protestant. They have nothing to do with the Bulgarian
64 church and he is now PR at the Ministry of Defence. Where the minister is called Karakachanov and
65 actually he is a leader of the party called VMRO. This is very, they claim to be like successors oh a
66 very old organization who called for the freedom of Macedonia which was once part of Bulgaria. So
67 they are like, you know revolutionaries.

- Isobel Squire

68 Would you say nationalist?

- Gergana Kutseva

69 They're absolutely nationalistic but they claim to be like patriotic more, not nationalistic. Yet they,
70 he's their leader and Urumov more or less he has influence on Karakachanov and this is how Society
71 and Values have written a statement, opinion on the Istanbul Convention a few months before the
72 scandal. When the Convention was introduced and the cabinet of ministers and they have to vote
73 whether to ratify, pass it to the national parliament or no. Actually it was VMRO and another
74 nationalist in the government who published their opinion copying directly Society and Values text.
75 And the funny thing here is that in the nineties these sects were very unpopular. They were really
76 threatened, mainly members of them were beaten and the society didn't accept, want them to be in
77 Bulgaria more or less. And VMRO were one of the biggest protestors against them, they were
78 actually those who beat them and the Orthodox Church as well was also against the sects. But it
79 was, yeah in the nineties and now VMRO and Orthodox Church are uniting with these people in this
80 anti-gender ideology.

- Isobel Squire

81 Yeah yeah. So you talk a little bit about that, would you say that the Bulgarian politicians here are
82 also key actors as well as the Society Association? And so the political members of the United
83 Patriots and Citizens for European Development of Bulgaria, I know that you mentioned then letters
84 that you sent to me.

- Gergana Kutseva

85 Yeah but they are let's say that they are called GERB or Citizens for the European Development. They
86 are actually supporting the document. They are the only, there are the good ones. The problem
87 with them is that it first nowadays in Bulgaria we don't have prepared politicians. I mean those who
88 are experienced who have a vision and who are ready to transform society, lead the process and so
89 on. The Prime Minister Boyko Borissov who is leader of GERB, is there like reactive, he is reactive.
90 All politics are reactive to the society. If people are happy about something, ok we going to pass it.
91 If there are voices against then he started to, to be you know from one side to another without
92 having a clear view and it is very hard nowadays to introduce any reforms because we are just on a
93 reactive level of decision making. That's why we didn't have a the political power to introduce the
94 Convention and to ratify it.

- Isobel Squire

95 I see. So are you saying it was then a populist reaction once the public had decided?

- Gergana Kutseva

96 Totally populist.

- Isobel Squire

97 And do you think that Society and Values Association knew that if they made their public statement
98 they could generate public debate against the Convention. And that's why they did it? or?

- Gergana Kutseva

99 I can only speculate but the truth is that there are members of them who are, how to say very well
100 established and on powerful positions and they are not public, they are not publicly open about
101 their affiliations. I've recently understand that the one of the, a right or right political parties let say,
102 but in our case in Bulgaria right means democratic, are also very religious and are also against
103 women's rights, abortions and so on, although they claim to be, you know, democratic. So it's really
104 complicated and to make it even more complicated another, actually VMRO was backed up by the
105 second biggest party in Bulgaria which is a Bulgarian Socialist Party, BSP. Who is left, socialist party,
106 liberal party by definition. Their leader is a woman, this is the only woman leader of a party in our
107 history and she reacted to the VMRO statements which was published let's say on 20, it was
108 between Christmas and New Eve. We had three working days two or three working days, all
109 happened in these two or three working days. She reacted on Facebook on her personal let's say
110 public profile but not official of the party and she said that she's against this gender ideology and
111 everything which is not natural to Bulgarians that there are only two sexes and it's going to
112 introduce the third sex and all this. That's why she is really, she is she can be blamed that she also
113 ignited this situation. And later as she put the BSP party in such a position that they couldn't
114 withdraw, drawback and say no we are actually in favour of ratification. Because I personally have
115 met her in the National Parliament two months before that where we spoke about introduction of
116 gender education because Bulgarian Fund for Women had developed such a programme already and
117 we had already tested it, being ready for the ratification because we know that the state is doing
118 nothing on this. We also had some different campaigns and we talked specifically on the ratification
119 and is she said to me personally, that she is working on making a coalition of women within the
120 parliament, regardless of their political affiliation who will insist on the ratification of the
121 Convention.

- Isobel Squire

122 And do you know what happened, did she just?

- Gergana Kutseva

123 Again I can only speculate and also just to the party itself, many years, for many years already are
124 organising petitions and events for the ratification.

- Isobel Squire

125 This is BSP?

- Gergana Kutseva

126 Exactly and it is this exactly what they did also in the last 16 days of activism against violence against
127 women. That's why all in the party were like, shocked and the party itself divided into two. But this
128 is, they are successors of the Bulgarian Communist Party. So it is quite monolithic structure in and
129 they will never publicly split and divide into two and they will vote identically, as one.

- Gergana Kutseva

130 And about what happened, your question. Again as I said I can speculate but the thing is that they
131 used to be very popular being one or second, competing for first place but always one of the biggest
132 party. And GERB getting more and more popular support. Although to be honest less than 40% of
133 Bulgarians vote. So we are not exactly sure whether 60 percent, if people decided to vote would go. I
134 mean that there might be a third really big political entity but this is only speculations. So they are
135 competing for this small portion of vote. GERB has more let's say about 30 percent, BSP was close to
136 it and dropped down to 15% of something. Which is a big problem for the socialists and they are
137 now, do not participate in the government now. So you can imagine they have to be an opposition in
138 order to attract more voters and this was a way for her to do that because she knew, and everybody
139 knows, that Bulgarian society quite patriarchal. People do not recognize discrimination and the need
140 for gender equality. Women are much prone to staying to the kitchen to be looked after and
141 something. You know their especially, although women were allowed to study and enter every
142 professional domain, in the socialist times. After this, actually women remained with double burden.
143 Being the main caretakers but also they had to work in order for, sorry but today my English...to
144 provide for the family budget. Yeah it's a huge difference between Sofia and the rest of the country
145 where the patriarchal norms are even bigger, here women moved to the house of the, usually the
146 house of the husband. So, yeah, many of them just say no it's completely normal its biology. It is,
147 society expects of women at a certain age to have children and many of them reinforces this notion
148 like, if I have to be a real woman I have to have children or something like that. It is in the last let's
149 say five years or something. When these narrative started to be challenged and we are doing this at
150 the Fund especially in the last three years.

- Isobel Squire

151 So that my next question how is the term 'gender' perceived here in Bulgaria?

- Gergana Kutseva

152 Very problematically because although it is used for already twenty something years by smaller
153 organisations dealing mostly with litigation and service provisions. But it has never been popular in
154 the general context and even we, when we started the 2015 were like, many times we tried to
155 translate the term into sex like because in Bulgaria we have only one word. And it could be
156 translated to sex. We don't have the word and also the notion worked of what gender is actually
157 about and also because there is an anti LGBT propaganda in Bulgaria it was very easy to connect
158 anti-gay propaganda with gender identity which is completely different from gender equality. But to
159 people actually started to, to think the gender equality and gender roles are actually expression of
160 gender identity, gender like a sexual identity.

- Isobel Squire

161 And so what's your understanding of gender then?

- Gergana Kutseva

162 My own? I try to explain it to people that gender is not, because they say okay if there is a gender
163 identity introduce and there is a third sex then there will be thirty sexes and I can say that I am a
164 woman and can enter toilets and you know, all this. And I say no gender is not something that you
165 define by yourself. Gender is the society, societal expectations how you as being female or male
166 should act in the society but they, they just can't do the difference.

- Isobel Squire

167 And do you think that part of the reason why, here understanding that men are masculine and
168 women are feminine is that also from a religious perspective as well, is that an influence from the
169 church?

- Gergana Kutseva

170 Well we actually, the church has never been a serious actor. But because this nationalist rhetoric is
171 being increased for us especially in recent years and they are reinforced mostly from Russia.
172 Because, the nationalist rhetoric is something opposite to the EU membership to the liberal values,
173 freedoms and everything which is, you know. Which is opposing our traditional affiliation with
174 Russia, our traditional values, our good tolerant society which we once were and everything and the
175 Church and Orthodox religion and practises, lets' say, are part of this mix of our, society as, how to
176 say. This notion of the perfect society which we once had. Many people, actually Bulgarians are not
177 religious, they may say that they belong to the Orthodox Church but actually they do not go to
178 church. They only celebrate Easter and Christmas and a few more days. But this is more or less
179 pagan rituals than religious rituals.

- Isobel Squire

180 So I read a statement from the Holy Synod saying they were against the Istanbul Convention. Do you
181 think that had much impact on people here or was the political debate?

- Gergana Kutseva

182 It was the political debate but the political debate used very well this statement. They use it as a
183 source of credibility, "See even the church is against" and the church is something, you know, holy.
184 Even they said the church here because we are of course not religious country, we are a secular
185 country. And they said it is the church who only twice interfered into the political life.

- Isobel Squire

186 And this is one of them?

- Gergana Kutseva

187 The first one was when Bulgaria saved the Bulgarian Jews and now it is the second time, so you can
188 imagine how important this issue is for saving our national identity and blah blah blah.

- Isobel Squire

189 On the national identity bit, is there also a perception that the Istanbul convention is coming from
190 Europe and imposing here. And that's why it's also been rejected?

- Gergana Kutseva

191 Yes, it is also okay. They use several arguments against. First is the third gender. It's going to
192 introduce the third gender and we are opening the door many genders and you know total, total
193 mess. Which going to actually and the problem is that our children could choose another identity
194 from men and women, or female and male. And we're not going to reproduce and they going to ,
195 that only that the nation will die but they will be frustrated and tricked. The next opposition is
196 against this third gender opens the door for gay marriages and we are totally against. We couldn't
197 allow gay people to marry in Bulgaria. This is not traditional, this is against the natural orders. There
198 is not the slightest recognition of human rights and everything. This is also a huge problem, it is
199 again natural order but also they going to ask for our children, they would like to adopt children.
200 Which will, I can imagine what will happen with their psyche. And the next opposition is the of
201 introducing gender education at schools. Again following this narrative that boys and girls will be
202 taught how to trans-dress, how to act like the opposite gender and they will be taught to become
203 gay and so on. And I forgot the most important claim...can you remind me again the question.

- Isobel Squire

204 I asked do you think that it was part of the resistance was also that the Istanbul Convention is seen
205 as a European idea, from the Council of Europe and that that's why it's been rejected here because it
206

207 doesn't fit with Bulgarian national. And you said that was of the main reasons was that it would
208 allow the third gender and education in school and gay marriage. We had previously discussed their
209 arguments of the politicians using statements by the Bulgarian Church.

- Gergana Kutseva
210 Okay.

- Isobel Squire
211 I can move on and then we can come back.

- Gergana Kutseva
212 Yeah lets move on and if I remember what I wanted to say because I started to explain all this to end
213 and...

- Isobel Squire
214 Yeah and its complicated! A lot of what you're explaining is and you've mentioned it before but
215 gender ideology. Would you say that. How would you describe gender ideology here?

- Gergana Kutseva
216 I say that there is no gender ideology.

- Isobel Squire
217 No gender ideology?

- Gergana Kutseva
218 I mean that for me, there is not gender ideology and introducing and talking about gender ideology
219 is something irrelevant, false. There is not such a concept. It was coined by the Vatican back in 94-95
220 as a reaction to the Beijing Convention. But this doesn't mean that there is such ideology existing at
221 all.

- Isobel Squire
222 And do you think, I know that you personally don't think believe that there is. You mention the
223 name party and I've forgotten; VMRO. Have they used "gender" as an ideology in order to build
224 resistance against the Istanbul Convention?

- Gergana Kutseva
225 Okay, they're using the term gender ideology same as the Society and Values Association but all
226 these narratives are borrowed from different contexts. They are just translated in Bulgarian, none of
227 them fully realise what is exactly, "gender ideology" they only use the term but they do not promote
228 or how to say, all the debates are on a very basic level. None of the politicians is aware of the
229 concept of gender equality.

- Isobel Squire
230 Okay so what do you mean by, can you explain a little more about that?

- Gergana Kutseva
231 The level of, how to say, when they talk about gender equality, it is something really imposed from
232 Europe. I mean that not as a bad thing. I say that this is the truth. I mean that this discourse is
233 transported here but there are no people involved with the decision making who can actually
234 develop such...

235 - Isobel Squire
A norm?

236 - Gergana Kutseva
237 Yes. And to be aware, they are not gender sensitive at all. Even, not this woman leader of the BSP
238 so that's why this debate was quite distant to them. They couldn't relate and couldn't explain that
239 this was the huge problem in front of GERB because they weren't convinced what its actually about,
240 this Istanbul Convention how important it is and what is the 'gender' is at all. Because I know from
241 my colleagues previously in the past we were lobbying for the ratification and before that the
242 adopting of the law on equality. We adopted this law because we were forced to do it. It was the
243 second draft and, not second sorry it was the ninth draft. Or the sixth draft and ninth minister who
tried to introduce adopt the law back from the early 2000s through today.

244 - Isobel Squire
And what was the law called, sorry?

245 - Gergana Kutseva
246 Law on equality, law on upon Equality of Women and Men. And this law less than 12 pages without
247 any material base. It is only we should, men and women will be equal the state should provide such
248 measures and policies and so one. But without any material base how can this bill come about? And
249 we lobbied to change the law before it's adoption; we couldn't and in the end decided better to
250 have such law and then later try to do amendments. Which I don't know whether it was the best
251 practice but it was adopted in 2016, in April 2016. It was when actually the Convention was signed.
252 And by these two steps the women's sector were like, "Okay we are moving forward". More or less
253 things going to be better and you know this debate proved us wrong., actually. And yeah I started
254 that actually politicians, they are, totally don't understand the concept of gender equality even they
255 say and you know, recently a minister I don't know. I don't remember which one said that of course
256 women have, ah yeah yeah. No um , "women when they are married the spouses should always
257 have sex with their husbands if their husbands want to. This is their obligation"- It was aired on the
national television.

258 - Isobel Squire
Who said? Do you know the politician?

259 - Gergana Kutseva
Volen Siderov.

260 - Isobel Squire
Could you ? (write on paper)

261 - Gergana Kutseva
262 Who is against, he is actually from ATAKA it is the same spelling in Bulgaria which means "attack"
263 and he is part of this coalition of United Patriots. Which is now in the government, it is against, a
264 nationalistic, chauvinistic I might say and of course populist party, financed by Russia. Yes he said
that but also the Prime Minister said like something...

265 - Isobel Squire
Because he has now spoken out against the Convention as well?

- Gergana Kutseva

266 No the Prime Minister is trying to win us. He is like a whatever the people say, I'm going to do what
267 the people want. And of course they started, all the social agencies started to make polls and they
268 saw 70 per cent against the Convention but of course the debate with already toxic. Even my mother
269 was like, "Yeah but they going to introduce the third gender" and I was "Mum I was talking, like for
270 three years I'm trying to explain to you the concept!" but all the media was flourished with this
271 narrative. We tried to be vocal, of course, did a lot of actions but the other politicians they have the
272 airtime. Many people who are high net individuals, let's say, well established are I don't know how
273 but there are evidences that they are moving their position on certain issues in order to stay popular
274 and from those, not in order to stay popular they are moving from where money comes. They may
275 even, talk about unpopular things if they're will backed up.

- Isobel Squire

276 It's speculation but where do you think the money comes from?

- Gergana Kutseva

277 For this situation mostly from Russia but also I think from conservative circles in United States.
278 Recently, I don't know if I have send you this study it was done from, activist from the former Soviet
279 Union and I think Russian because they think that she is Ukrainian/Belorussian or something like
280 that. She works in Brussels and she did research on all these religious organizations how they
281 established NGOs. Did I send you this?

- Isobel Squire

282 No but I would be interested if you could.

- Gergana Kutseva

283 Even I can send it now in order not to forget. So she claims, she basically has a list all these
284 conservative NGOs call who are established in Brussels in order to the EU policy. And also the
285 funding comes she said that the conference it is not written in this report that the money for anti-
286 abortion movement in Latin America and Spain comes from Caroslim(?) And the money for this in
287 Eastern Europe and Russia comes from a Russian Oligarch which name I forgot but this I know
288 people who give money under the...

- Isobel Squire

289 When I was reading about World Congress of Families there was a link to a Russian Oligarch and
290 then a link to activity here as well.

- Gergana Kutseva

291 Yes, and you know that all these oligarchs are very globally connected with Putin because it is very
292 centralised economy industry of course as well. This means that he is using all their resources and
293 money in order to influence politics. He is first, the policy which is like the vision he has and Russia
294 has always had this vision, like for the third Rome, for the saviour of the Orthodoxy. Christianity in its
295 purity and so on and this is a very strong narrative in Russian national identity. They do believe this
296 and that's why it's really easy to use the church and the Orthodox to defend some these values, like
297 women is below men and so on, and to influence the politics of Europe, like trying to diminish its
298 power and position.

- Isobel Squire

299 So I'm struck that you said that lots of politicians here don't understand the concept of gender
300 equality but would you also then say that, they did understand or were more ready to understand
301 that gender could be seen as something that allowed the third sex and that was anti gay marriage

302 and other anti gender education in schools and that was more popular norm than the gender
303 equality norm?

- Gergana Kutseva

304 I can't say that these are norms. This is something which was just introduced with this debate, we
305 never had this debate before and now it is ridiculous but to be honest we were thinking that actually
306 all this was beneficial for us, for the women's rights movement because society and politicians
307 started to understand at least there is such topic, which is not so easy. There needs to be debate on
308 this and so on. So more or less we entered into the...without...

- Isobel Squire

309 And these anti gender campaigns and the gender ideology discussion isn't new to Europe. There
310 have been cases in France in 2012 and Italy and Poland. So would you, do you think that's why the
311 debate seemed to come out of nowhere really quickly. Could there be an influence from discussions
312 in other countries?

- Gergana Kutseva

313 Exactly. Not only influence it was directly copy and pasted messaged.

- Isobel Squire

314 Yeah I see that in my research.

- Gergana Kutseva

315 Same in Croatia, same in Poland, same in Latvia, same in Russia. Same in Armenia and Georgia
316 although they have ratified. I have read a lot of fake news articles but widely popularised. Russian
317 who are, it's very funny because when they are translated in Bulgarian from Russian to Bulgarian for
318 instance, gender is jender Russian, and it is not with 'g'. Okay translation is different from Russian to
319 Bulgarian although they sound similar. Also they say not Istanbul with 'n' but Istambul with 'm', it is
320 like that in Russian. So you, by these two mistakes. You can see that, which is the source actually.

- Isobel Squire

321 Okay no I don't follow?

- Gergana Kutseva

322 Okay, so there is a text in Russian and they translate it into Bulgarian. Of course claiming that this
323 is...

- Isobel Squire

324 Oh so I see so the fake news, so when you read it you know that it's from a Russian site not in
325 Bulgarian.

- Gergana Kutseva

326 Yes or even when there are trolls and they use these words because they were firstly acquainted by
327 Russian sources, you know, and when they are writing Bulgarian they used the same transliteration;
328 the same spelling. So it's very easy to follow that these are actually paid trolls who are using
329 messages but translating them in Bulgarian but because they're absolutely not aware of the terms at
330 all.

- Isobel Squire

331 So I guess this is a very broad question but we've talked about situations anti gender events in other
332 countries and the influence of Russia. So why do you think these movements are happening. What

333 do they want, because lots of the things that I read so far, the statement from the church and the
334 statement from the political parties here. They all say that defending women against violence is very
335 important but then there is always a bit but we can't ratify the Istanbul Convention...

- Gergana Kutseva

336 Because this, they are anti-liberal in their essence, they're against migrants, against globalisation,
337 against liberalisation. These are two basic value sets, let's say, democratic, liberal, open and closed,
338 xenophobic. You either choose one or the other and this one who is conservative is also against, it is
339 misogynistic in its essence. It is against participation of women because I'm constantly reading you
340 know, opinions and everything. There are many, many in Bulgaria saying that women are inferior, of
341 course, you know all this. I mean that it is not so different as it is in many other countries with these
342 Breitbart. Oh yeah I remembered two important things because you asked whether it is, first I have
343 to say the name of the Istanbul Convention was also very important, and the second thing when I
344 was thinking, when I was saying what were the main objectives against the Convention. The last one
345 was the this GREVIO Committee, which they used like; "it will be a police", "a gender police who has
346 the status, even bigger than a diplomatic status"; which is going to allow them to come and take our
347 children and sue Bulgaria against discrimination we are going to be all the time in the Strasbourg
348 Court and something like this. And then they compared this to the social actually, service agency
349 from Norway which is called Barnevernet or something. But you can check, this is the service the
350 social service and they say how many more than fifty thousand were taken from families in Norway
351 and given to LGBT couples, and blah blah blah blah, and so GREVIO is going to do the same here.

- Isobel Squire

352 So all of that sounds a lot like one of the reasons against the Istanbul Convention was because it
353 was a foreign thing, like an alien intervention, something that wasn't Bulgarian.

- Gergana Kutseva

354 Yes and this GREVIO going to have the immunity and will be above all the legislation of Bulgaria, so
355 they have unrestricted power to do whatever they want with our country and in our country. And
356 this narrative,

- Isobel Squire

357 Very powerful rhetoric.

- Gergana Kutseva

358 Exactly and that's why I wanted to explain it because this, all of this rhetoric actually have no base
359 there is no common sense in this. But they're so influential and it was so easy to frighten people, of
360 course the 70% would be against! If I wasn't into this, and I hadn't read the Convention, probably I
361 would be against as well. I mean yeah it's really sucks.

- Isobel Squire

362 Yeah, when you hear that, that's true. And so you said that the name Istanbul Convention was very
363 important?

- Gergana Kutseva

364 Why actually VMRO started this,

- Isobel Squire

365 How do you spell VMRO sorry?
366

367 - Gergana Kutseva
V-M-R-O

368 - Gergana Kutseva
It can be translated it's in Bulgarian (says name in Bulgarian) so it's like great Macedonian
369 Revolutionary Organization, something like that.

370 - Isobel Squire
Wow, that's a name.

371 - Gergana Kutseva
I told you before that the Bulgarian state I mean that, the liberation of Bulgarians from the Turks.

372 - Isobel Squire
So that's why, ahah!

373 - Gergana Kutseva
That's why the name Istanbul and we were kidding even five years ago because I am a PR
374 professional and I was like, wow, it's such a bad PR joke to call this Convention, Istanbul Convention.
375 We even, when we wrote pieces and we talked to shows we tried to use the whole name and not to
376 stress of the name Istanbul because it is like the first, the first notion without...

377 - Isobel Squire
It's already negative?

378 - Gergana Kutseva
Yes

379 - Isobel Squire
I'm sorry we're now up to an hour. I only have maybe two or three more questions if you have time?

380 - Gergana Kutseva
Yes, sorry just to check because they have, no it's all fine. I have another meeting and I'm checking
381 whether someone has arrived. Okay.

382 - Isobel Squire
In your opinion what do you think is the main reason that the Istanbul Convention was not ratified.
383 If you had to pick one reason what would it be?

384 - Gergana Kutseva
Because so of the general lack of sensitivity towards women's issues.

385 - Isobel Squire
And that over the fact that gender didn't translate or the understanding of gender and gender
386 equality wasn't?

387 - Gergana Kutseva
Both, yes because if we had understanding of gender equality and gender mainstreaming policies
388 and everything because when Bulgaria became part of EU, we have signed this document! That
389 gender would be mainstreamed in politics and everything but in practice nothing was done. And the
390 politicians, it's just the they owned the document without any political efforts .

- Isobel Squire

391 And what do you think will happen next Bulgaria, do you think the Convention will ever be ratified?

- Gergana Kutseva

392 Let's say that I'm an optimist, because they have, what GERB decided to do first they have promised
393 our European partners that we're going to sign it, especially now we are leading the presidency. So
394 it's a very bad sign. Yeah. And they claim to be the most Democratic Party in Bulgaria and with
395 European, they have European in their name! So these will be a very bad sign. What they decided to
396 do is to ask the constitutional court whether it interferes with the Bulgarian constitution because
397 there were such claims. That we have to change the constitution in order to ratify the Convention,
398 this is international document who will have, has bigger power than the Constitution. Many
399 speculation surrounds which of course are not true as well. But also from very prominent advocates
400 like one called Sheitanov who was the one, I don't know of course you haven't followed this but I
401 don't know how many years ago but there was a huge scandal with Bulgarian doctors and medical
402 servants in Libya. Who were accused by Gaddafi that they had contaminated thousand's children,
403 Libyan children with HIV, and he was defender. They finally they got back home but all this
404 happened with the huge help of Sarkozy and his first wife who went there, met with Gaddafi. I don't
405 know what kind of deal they made but they finally released them. It was one doctor and five or six,
406 I've already forgotten. (Writes down name of attorney) Okay he is an attorney on the Libyan case
407 and because they came back to Bulgaria like heroes you know. He's also like the hero who helped
408 them which is completely not true as I told you, it is a matter of international diplomacy. But he's so
409 you can imagine, he's kind of "experts" to this and he is saying "No Bulgaria is going be sued, it is
410 anti-constitutional" and so on. When people hear about it they're like "oh wow he's an expert". Also
411 there is another prominent attorney who is usually defending gangsters you know the most, the
412 cases which are really hard let's say, and are of big public significance and that's why he's famous. I
413 can't say that both of them are real experts and are very good professionals but they are prominent.
414 And they were actually, I'm absolutely convinced that they were bought (in order to) say this things.

- Isobel Squire

415 To say that the Convention was an unconstitutional?

- Gergana Kutseva

416 Yes.

- Isobel Squire

417 So and you said that you're optimistic but what does the fact that the Convention hasn't been
418 ratified what does that mean for your work, what will you do?

- Gergana Kutseva

419 I mean it is now with the constitutional court and I am optimistic that they will say no it's fine it
420 does not go against the Constitution in and the GERB or Boyko Borisov will use this argument and
421 say, you see it is fine we're going to support this and now at that moment. Yesterday the first draft
422 of amendments were made towards some, for introducing many of the Istanbul Convention's goals
423 and objectives like increasing the number of crisis centers, increasing the number of financing and
424 something like that where all the parties are united and are supporting this. So I think that if the
425 court says yes it's fine, then GERB will say okay you've already adopted many of the measures of the
426 Istanbul Convention and so we are ready for the ratification.

- Isobel Squire

427 And so for you and your work here over the next couple of weeks will you try and what do you
428 what's your plan. What will you do?

- Gergana Kutseva

429 We were the only women's organization invited by the court for official statement. So we've done
430 this and also we've found urgent funds and we funded, 10 I think, campaigns for the ratification of
431 the Convention. I mean it happens even now somewhere around the country in a small village to so
432 that people could be, could hear again in a more positive context from experts all through different
433 campaigns. One organisation is going to make an art competition and something.

- Isobel Squire

434 Could you show me the documents on that. Do you have any?

- Gergana Kutseva

435 In Bulgarian

- Isobel Squire

436 Okay.

- Gergana Kutseva

437 I may but it's in Bulgaria and it's a long text to be translated.

- Isobel Squire

438 I understand.

- Gergana Kutseva

439 And of course we consulted experts on this, so in the language itself is very specific. If you find
440 someone to translate it to you not a problem, I mean this is a public document.

- Isobel Squire

441 And so how have you tried to talk about gender in the Istanbul Convention in a more positive way
442 when previously it had been talked about in a very negative way.

- Gergana Kutseva

443 What we are trying is to distinguish gender identity and gender equality. And gender identity, is
444 assumed as sexual identity but these are different things. The other thing I told you trying to explain
445 that gender is a social construct which is imposed on the individual and not that that individual is
446 developing gender notion of him or herself. Yeah maybe, I mean that there are many other things
447 but right now. Also we are trying to put gender equality as a concept and gender mainstreaming as a
448 prerequisite and a horizontal principle of the Sustainable Development Goals. So to put it in a more
449 wider context and through our campaigns, initiatives, projects we are working on many levels for
450 instance we show gender inequality in arts, gender inequality in parenting, gender inequalities in
451 schools, sexual education access to all safe not only abortion but safe contraception, early marriages
452 and forced marriages, early pregnancies as a prerequisite for dropping out of school for girls which is
453 connected with the economic potential of women and participation of the labour power which is
454 connected with the GDP growth and blah blah blah. So we are trying to with all the projects to give
455 also the broader prospective why it is important for the society it is not just...For instance an activist
456 of ours has done the first ever project on menstrual activism in Bulgaria recently. And she also, of
457 course this is not the most important thing but as introductory to the topic. She talked about

458 activism connected with the menstrual poverty because social exclusion, poverty, access, it is a huge
459 topic in Bulgaria.

- Isobel Squire

460 Yeah I saw actually on the way here there was a sanitary pad with glitter?

- Gergana Kutseva

461 Yeah yeah yeah exactly!

-Isobel Squire

462 I saw that and I thought I'd ask you!

- Isobel Squire

463 I have just one more question that's come to me because I've actually gone through all of my pre-
464 written ones but I notice that, in your open letter that you sent, you wrote a little bit about your
465 position as an NGO and you were feeling under threat by anti-gender campaigns.

- Gergana Kutseva

466 Yes we received life threats, yeah but wasn't only us. We gathered all the information. What I didn't
467 mention and it's also a huge topic but our, what was for our reaction. When VMRO came out with
468 this position, we started to receive, it was during Christmas and we were on vacation and we started
469 to receive Facebook messages and emails from random people but also from activists, "What are
470 you doing?", "It is you who have to defend the Convention and do something". It is me and my
471 colleague and recently we hired a third person so you can imagine we really have this notion, we
472 managed to develop this idea of Bulgarian Fund for Women as a really influential entity but in reality
473 we are, we are lacking human resources. And we were prone you know to, to back up and just stand,
474 follow because there is a lack of protection of violence against women gender based violence
475 actually they just changed the name and there are some other NGOs who are working for years.
476 They are already women for 20 plus experience it the topic, we are even not low-experts at all; our
477 background is completely different. But this was the public expectation and we were like, okay we
478 have to do something. We wrote a statement which we published on our site and said to the media.
479 And then they came to us, "okay come to for an interview" and everything we realize we can't do
480 this, I mean that we can't be at every television. And then this idea came to me to wrote e-mail to
481 as many of our grantees, of course, and to as many other civil society organizations as possible, ask
482 them to support our statement and also to think some collective actions in the future. First it was
483 only to sign our statement because Society and Values Association and VMRO were like, it is signed
484 by 30 organizations and I said, "okay we're going to sign 200". And that's what we did. So we did
485 this ad-hoc coalition and we are now continuing to work on this, thinking whether we should
486 develop a different civil society entity especially for the promotion of civil rights. It is something you
487 know just, a work in progress. But this was our response and we'll see. I mean that takes it a lot.

- Isobel Squire

488 It's a lot, it seems like a lot and it's a complex issue.

- Gergana Kutseva

489 And we use we also and we also sent all international institutions.

- Isobel Squire

490 What was your feedback like from them?

- Gergana Kutseva

491 European Women lobby together with, and then they all gathered. I mean that our appeal was
492 please unite, this is not the Bulgarian issue. This is something which is concerning Europe, but even
493 abroad. So we have to, I have to send you this with the paper because you see we have sent them
494 these and many other, everything which we have gathered. You see these organizations are uniting
495 they're working together. They are there was set up on purpose, they're in the U.N. actually these
496 conservative circles in the States and in Russia have bought African and Asian countries to defend
497 their agenda in the U.N.. That's why there is a step back from the gender equality and rights which
498 we are witnessing the last two or three years.

- Isobel Squire

499 Yes, was brilliant. Yeah. I won't keep you any longer because I know I've gone I know over my time.

Appendix F- Interview Guide

- ❖ What is your name and job title?
- ❖ Can you tell me about the Bulgarian Fund for Women?
- ❖ Who were main actors working against the Istanbul Convention?
 - How did religious actors in Bulgaria respond to the Istanbul Convention?
 - How did Bulgarian politicians respond to the Istanbul Convention?
 - How is the Council of Europe perceived in Bulgaria?
- ❖ How is the term 'gender' perceived in Bulgaria?
 - What is your understanding of "gender ideology" in Europe?
 - What is the discourse surrounding "gender ideology"?
 - Has "gender ideology" or Bulgaria's current perception of gender spread from other countries?
 - What is your understanding of 'gender'?
- ❖ Do you consider anti-gender to be the new norm in Bulgaria? And if so how?
 - How have anti-gender campaigns operated in Bulgaria?
 - In your opinion, what is the main reason the Istanbul Convention was not ratified in Bulgaria?
- ❖ *Supplementary questions:*
 - What do you think will happen next in Bulgaria? Will the convention be ratified?
 - What does the refusal to ratify mean for your work?
 - What are the next steps you will take as an NGO?