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The queer international: LGBTI+ advocacy at the United Nations beyond 'Western imposition'

Rafael Carrano Lelis
Geneva Graduate Institute, Switzerland

Abstract

This article examines the debates at the UN Human Rights Council (HRC) surrounding the renewal of the Independent Expert on sexual orientation and gender identity (IE SOGI). Based on ethnographic fieldwork, it analyzes the interplay between colonial legacies, cultural narratives, and queer transnational advocacy. The research addresses three central questions: How do discussions of colonialism intersect with debates on gender and sexuality at the HRC? What impact does this intersection have on the strategies of queer transnational activists? How do the distinct positions of states and civil society actors influence these debates? The article argues that state representatives often perpetuate colonial binaries, invoking "culture" to delegitimize sexual and gender diversity as "Western" or "unnatural." Conversely, LGBTI + activists engage in decolonial advocacy, challenging these cultural monopolies and asserting their truth about the intersection that marks their identities. Such contrast underscores a key distinction: While states reinforce static hierarchies, civil society actors mobilize transnational solidarity to construct a "queer subject of rights" in international human rights law. In doing so, the article introduces a more nuanced analysis of Joseph Massad's notion of the "Gay International," which portrays international queer advocacy as a form of Western imposition. This study highlights activists' resistance to cultural essentialism and their contributions to a more inclusive understanding of queer rights within global governance structures. The findings contribute to broader discussions on coloniality, decolonization, and the politics of sexuality in international fora, emphasizing the transformative role of transnational queer advocacy in challenging global power hierarchies.

Corresponding author:
Rafael Carrano Lelis, Geneva Graduate Institute, Chem. Eugène-Rigot 2, Geneva 1202, Switzerland.
Email: rafael.carrano@graduateinstitute.ch

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Introduction

I am feeling uneasy as I sit, surrounded by state delegates, in one of the first meetings I attended as part of my fieldwork at the Palais des Nations, where the United Nations (UN) is headquartered in Geneva. This feeling builds up when Egypt's representative, one chair to my right, asks for the floor. His intervention is to record firmly Egypt's opposition to renewing the mandate of the UN Independent Expert on protection against violence and discrimination based on sexual orientation and gender identity (IE SOGI), which is the main item on the agenda of the day and the reason why both diplomats and activists are gathered in the room. The remarks that followed insinuated that the mandate might provide the means to justify a series of conducts, including "pedophilia" and "sex with trees." The statements relied on the well-worn dehumanizing trope of associating homosexuality with so-called 'unnatural' behaviors. As the meeting continued, however, another argument gained traction as the most recurrent objection. This argument was first raised by Bahrain and then echoed by many other states: "SOGI goes against *our* culture."[1] In other words, these state delegates were suggesting that the recognition of sexual and gender diversity protected by the mandate would be unacceptable according to their cultural traditions.

Feminist scholars have shown powerfully how posing culture and nature as binary opposites has served to justify women's inequality in society as 'natural,' excluding them from participation in public life, particularly the political and decision-making spheres (Federici, 2004; Fraser, 2013; Pateman, 2015). Likewise, the justification of racial hierarchies by associating people of color with 'nature,' including through the process of colonization, is constantly evoked to justify forms of violence against those who are framed as bestial and uncivilized (Fanon, 2008; Mbembe, 2019; Vigoya, 2018). The same binary of culture versus nature acquires a different mode of operation when it comes to individuals who challenge the established norms of gender and sexuality. Their otherness is not produced through the denial of the realm of culture and their positioning within the untamed space of nature. In fact, the abjection of queer people,[2] as briefly illustrated above, is paradoxically "conceived within the homophobic [and transphobic] signifying economy as both uncivilized and unnatural" (Butler, 1999a: 168). Even if strategic mobilizations of the notion of culture try to frame sexual and gender diversity as *belonging* to so-called Western cultural values, the fact is that this form of derogatory characterization is seen in all corners of the world. Practices like oral and anal sex have long served as reasons to label homosexuality as 'unnatural' in the United States and Latin America alike (Lelis, 2023; Weeks, 2018). Likewise, British legal provisions criminalizing consensual same-sex sexual acts often invoked 'buggery' or the label of 'unnatural offenses.' These laws were exported to the Americas, Africa, Asia, and Oceania during English colonial expansion and still make up a considerable

portion of the criminalizing legislation currently in place worldwide (Mendos et al., 2020).

As dedicated historiography shows, politically organized groups advocating for sexual liberation are relatively new, in both the Global North and South, and are usually placed within the context of the counter-culture movements happening at the end of the 1960s, mostly in Global North countries (Belmonte, 2021b).[3] One of the major struggles of gays and lesbians from the beginning was always to find ways to insert themselves into the realm of cultural intelligibility, precisely because they were seen to be outside of it and were denied the place of belonging in every cultural context, *including* in so-called Western culture (Butler, 1999b, 2004a; Fraser, 1995).

The actions of activists I observed at the UN represent a continuation of this "struggle for recognition" (Fraser, 1995). Even outside the domestic sphere, they are still forced to return to debates about their national cultures to claim a place of belonging and existence, challenging the monopoly that states tend to claim over their culture when speaking at multilateral spaces. Activists do so in a context of rights-claiming; they invoke their cultural backgrounds to underline that the *legal* queer subject, the rights-bearing subject, is not a Western one.

In this article, I tell and analyze a small part of this process. In other words, I explore how the LGBTI + transnational movement's advocacy actions are shaping a *decolonial queer* subject of international human rights law (IHRL), and address the following questions: (Q1) How do discussions regarding colonialism and gender and sexuality intersect with each other in debates at the UN Human Rights Council (HRC)? (Q2) What effects does this intersection have on the actions of queer transnational activists? (Q3) Finally, how does this particular debate reflect the distinct positions occupied by states and civil society actors? What these research questions illuminate, especially when addressed through the ethnographic method I detail below, is the complexity with which colonialism and gender and sexuality intersect in global affairs, making visible the different power relations that operate in these institutional spaces of international law. As such, the answers to these questions offer granular insights into social interaction that are not available in the mere analyses of documents and discourses. This approach adds a relevant element to contrast with how the critique of this type of activism has been carried out in scholarly work.

The results presented in this article introduce initial findings from a broader research project on the dimensions of the production of a queer subject of international human rights law. My argument is twofold. I argue that there is a fundamental difference in how states and civil society engage in discussions regarding SOGI at the UN. While the former perpetuates colonial binaries, the latter implements decolonial principles in its advocacy efforts. Consequently, a theoretical framework to analyze these dynamics should be sensitive to the hierarchical differences that exist in and are produced by global governance structures, which affect the interaction between states and non-state actors. Next, my argument shows how activists oppose states' attempts to claim a monopoly over the meaning of their national cultures. I analyze how this happens in discussions with states at the HRC, and in advocacy efforts and encounters with states outside the official fora.

Both aspects of the argument serve as a counterpoint to Joseph Massad's description of the "Gay International," which frames international advocacy on gender and sexual diversity as a form of imposition of Western values (Massad, 2002, 2008). Yet, contradicting Massad's arguments should not be seen as the main object of this article, which goes well beyond that. His work serves as an example of a widely disseminated argument about queer transnational activism, and LGBTI + human rights advocacy. The specific choice to address Massad's contribution to it is both because it remains an influential piece of literature and because it is inserted in the context of serious scholarly study and critique, which is not the case in the many other instances where this argument is raised. In this sense, I join other scholars who have sought to produce a nuanced and empirically grounded account of LGBTI + activism to contrast with Massad's interpretation. Especially, my work guards a close complementarity with that of the Palestinian anthropologist Sa'ed Atshan (2020). While Atshan's ethnography focused on the effects of critique on the lives and activism of queer Palestinians, I address a second dimension of Massad's argument by looking at the engagement of transnational activists advocating for SOGI rights in international fora.

The findings discussed in this article are based on archival research and ethnographic fieldwork conducted between 2021 and 2024. I visited archives in London and Amsterdam in 2022 and 2024.[4] The ethnographic fieldwork includes both participant observation and interviews with activists, diplomats, and UN civil servants. The events observed were mainly limited to Geneva, with a few online meetings, and encompassed both meetings with activists only and debates with states, during the 48th to 53rd sessions of the UN HRC. I conducted a total of 65 interviews; the majority of these being key informant semi-structured interviews, and a smaller number of oral history interviews. These included: 14 international civil servants; 51 civil society activists; and 12 state representatives.[5] In the following pages, I focus more specifically on debates that took place in the European summer of 2022, during the IE SOGI mandate renewal.

The article is divided as follows. After this introduction, I briefly present Joseph Massad's argument on the "Gay International." Then I turn to states' discourses during the informal meetings on the renewal of the IE SOGI mandate at the HRC and examines their role in maintaining binary and static understandings of concepts such as Western and non-Western cultures. In sequence, I explore transnational LGBTI + activists' engagement in Geneva, during the 50th session of the HRC, and draw the elements that make up the 'queer international.' The last section concludes the article.

Thinking like a state, addressing civil society: Homonationalism and the Gay International

The colonial reverberations of the 'gay' movement's attempt to universalize a discourse on 'gay rights' are the focus of Joseph Massad's critique in 'Re-Orienting Desire: The Gay International and the Arab World' (Massad, 2002, 2008). The groups acting on this "universalizing project" are what he labels the "Gay International," which includes queer non-governmental organizations (NGOs) and activists engaging in human rights advocacy at the UN. The author provides an insightful critique of how actions with

emancipatory intentions might serve to reproduce colonial and racist discourses. His work has influenced many of my reflections about debates on gender and sexuality, and his account remains relevant in critical international legal scholarship addressing LGBTI + human rights and queer activism (Gross, 2007, 2013; Kapur, 2018a, 2018b). My contribution to this debate demonstrates how *current* queer transnational advocacy deals with questions of race and colonialism in ways that go beyond the binary discourse that opposes the 'West and the Rest.' Further, by comparing the discourse and actions of states and civil society, I illustrate how Massad mobilizes very similar arguments to the ones also put forward by states. In doing so, and in a critique of civil society actors, he misses the targets who are actually responsible for sustaining the logic of colonial domination that he so skillfully illustrates.

Massad's article 'Re-Orienting Desire' was first published in 2002 (Massad, 2002). This was more than two decades ago, and many of the examples in the analysis drew from activist action from the 1990s. A lot has happened since his initial diagnosis.[6] One of the many changes is the increased welcoming of post-colonial and decolonial critiques by LGBTI + transnational organizations. As a result, debates about culture and the different experiences of queer people in the Global North and South are increasingly shaping activists' advocacy strategies. Therefore, a current and nuanced review of his work is needed urgently. Particularly, shedding light on specific modes of agency and the complexity with which activists themselves handle the ideas of colonialism and the 'Western imposition' of sexual identities (Massad, 2002).

Based mainly on the examination of documents ranging from NGO statements to blogs and travel guides, Massad argues that the discourse of "missionary" gay rights organizations "both produces homosexuals, as well as gays and lesbians, where they do not exist, and represses same-sex desires and practices that refuse to be assimilated into its sexual epistemology" (Massad, 2002: 363). Later, he concludes that "the Gay International's imperialist epistemological task is proceeding apace with little opposition from the majority of the sexual beings it wants to 'liberate' and whose social and sexual worlds it is destroying in the process" (Massad, 2002: 385).

As Atshan observes about the Palestinian context, "he does not see how terms such as gay are borrowed, and in some ways no longer Western, as they are translated into new contexts […] does not recognize how LGBTQ categories and identities are deployed, internalized, reconfigured, and indigenized" (Atshan, 2020: 192). Moreover, Massad overly emphasizes a 'project' to impose sexual identities. This overplays the possibility of agency of Western civil society actors, disregarding the influence of many structural factors, such as the lack of resources and the precarity of the environment in which advocacy initiatives are developed. At the same time, it downplays the agency of Global South queer activists and organizations who have long been part of this process. Through the refusal to acknowledge the agency of Global South activists, his framework assumes non-Western cultures as static and vulnerable to the "inherently coercive" influence of Western values (Atshan, 2020: 192).

So many years after this argument was introduced, it would be simplistic to understand the LGBTI + transnational advocacy as having the "larger mission" aiming to "liberate the Arab and Muslin 'gay and lesbians' from the oppression under which they allegedly live

by transforming them from practitioners of same-sex contact into subjects who identify as homosexual and gay" (Massad, 2002: 362). As Jasbir Puar (2017: 230) has noted,

> The call-and-response process that continues to rely on opposing a 'mainstream/global queer' against a 'queer of color/non-Western queer' often fails to interrogate the complex social field within which 'queer' is being produced as a privileged signifier across these boundaries, with effects within multiple national, regional, and local areas. While Joseph Massad's work is not inaccurate about the history of sexuality and the travels of the Master Sign of 'sexuality' through colonial administrative institutions, his rendering of the 'gay international,' privileging the figure of the native subaltern sexual subject untainted by these transnational circuits, reifies the distinctions between the West and the rest that he insists should be undermined and challenged.

In addition to eliding this dimension through reifying distinctions between Global North and South, for a work borrowing from the critical tradition of post-colonial studies, Massad leaves the role of states surprisingly uninterrogated in his analysis of transnational discourse around 'gay rights.' For instance, his comments (Massad, 2008: 179–180) on the debates at the Fourth World Conference on Women in Beijing in 1995 fail to acknowledge the collaboration between states affiliated to the Organization of Islamic Cooperation (OIC) and the Holy See in countering issues of 'gender' and 'sexual orientation' (Butler, 2004b; Corrêa, 2018). A partnership that indicates that the topic is more complex than what the label of 'Western imposition' might suggest; a rhetorical expression arising both from Massad's arguments and from the states' discourses I analyze below. Likewise, he characterizes the emergence of sexual orientation debates in Beijing as "a result of the imposition of the agenda of the Gay International by U.S., Canadian, and European NGOs on the rest of the world" (Massad, 2008: 179). Here, once more, he does not acknowledge the crucial protagonism of lesbian and feminist activists from the Global South,[7] particularly Latin America, who played central roles in spearheading the discussions that unfolded there (Corrêa, 2018; Hierro et al., 1995).

There is a central distinction in the epistemological framework behind the critical theories of the Gay International, offered by Massad, and that of homonationalism elaborated by Puar. The former restricts itself to civil society action, while the latter exposes "the complexities of how 'acceptance' and 'tolerance' for gay and lesbian subjects have become a barometer by which the right to and capacity for national sovereignty is evaluated" (Puar, 2013: 336), which is increasingly mobilized by states. To be sure, homonationalist discourses can still be deployed by civil society and other non-state actors, such as corporations, and the lack of nuance in mobilizing the notion of 'homonationalism' and related critiques might have its own detrimental effects on the lives of activists (Atshan, 2020: 202-203). Nevertheless, the core of its critical potential offers us insights into interrogating colonial and imperialist practices undertaken by states and how this unfolds in the context of global queer politics. This is an important nuance for the analysis that follows, which also helps us to understand the "global conditions of homonationalism" that enable homonationalist practices from Israel to the United States and others (Puar, 2013: 337).

Speaking like a state: Reinforcing sexual and cultural binaries

One of the many functions of the UN HRC is debating and voting on resolutions. These documents usually address the human rights situation in specific countries or broadly deal with one or more aspects of substantive human rights. The frequency varies according to the resolution and its purpose, but the same one is usually repeated either annually or biennially. The rationale behind this is that the more often a text is discussed and approved, the more the standards set in it will be crystallized and become part of what human rights are considered to be. The resolutions both materialize new forms and interpretations of the idea of human rights and, at the same time, provide the authority to make sense of what is acceptable or not to be included in these same documents. From time to time, the goal is that a resolution will be able to 'advance' in the language they initially set and, through small changes, gradually expand the scope of rights and the meanings of universality. Another purpose of the resolutions is the creation and renewal of special procedures' mandates that compose the architecture of the Council. This means setting the scope, limits, and objectives of the work of many thematic or country-specific mandates, which are responsible for addressing a range of human rights-related situations. Among these mandates is the one of the IE SOGI, created in 2016.

The procedure for the adoption of resolutions is the following. First, a state or a group of states (the 'core group') has to be willing to sponsor and introduce the resolution. Then, in addition to bilateral discussions, states organize informal consultations (the 'informals') to discuss the draft resolution and get feedback from their peers to modify the text before the final adoption in the plenary of the HRC. Each informal usually lasts for one and a half hours, and the number of meetings that are necessary depends on the time states spend going through all the paragraphs. Despite the name, these meetings are still marked by several rituals and rules. Perhaps what is more informal about it is that these debates are usually kept outside official records; with rare exceptions, official minutes are not produced or published. There is also no voting or any official text adoption. Above all, it is a space for the sponsoring states to hear inputs, sense the leaning of their peers, and decide strategically whether or not to change the text before submitting it to the appreciation of the plenary.

Following closely these informal discussions can provide insights into the actions of both state and non-state actors in global governance human rights fora. While most of these encounters are kept outside official records and documents, there is also an important dimension of documenting what happens in these spaces through the rendering of ethnographic accounts of these interactions. Below, I offer an analytical description of one such moment, the informal debates regarding the renewal of the IE SOGI mandate. The discussions and power dynamics seen there not only summarize a great deal of how SOGI issues are characterized within multiple UN fora but also illuminate the different arguments put forward by state actors, which rely on both a static understanding of 'culture' and on the binary opposition between 'Western' and 'non-Western' values. As such, this section addresses more directly two of the article's research questions by examining the intersection between debates on colonialism and sexual and gender diversity (Q1) from the standpoint of state actors (Q3).

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The first informal for the renewal of the IE SOGI mandate took place in Room XXII at the *Palais*, on the afternoon of June 17, 2022. In the back of the room, on a podium, sat the delegates of the seven states that form the core group now traditionally known to put forward this resolution. They are frequently referred to as the "LAC 7," a name that very descriptively indicates the regional origin of its components: Argentina, Brazil, Chile, Colombia, Costa Rica, Mexico, and Uruguay. The LAC 7 first introduced Resolution 32/2 in 2016 for the creation of the IE SOGI mandate (United Nations, 2016). At the time, it was the third UN HRC resolution to mention SOGI. The first two were adopted in 2011 and 2014, calling for a study and a panel discussion on the topic (United Nations, 2011) and later taking "note with appreciation" of the presented study, and requesting an updated report from the UN High Commissioner for Human Rights. In 2011, the core group sponsoring the resolution was cross-regional, composed of South Africa and Brazil.[8] In 2014, an initial formation of the current group, then only "LAC 4," was the original sponsor of the text; among them were Brazil, Chile, Colombia, and Uruguay.

The diplomat from Uruguay kicked off the meeting with some opening remarks. Amidst it, she added a reminder about something one might assume to be taken for granted in such spaces: "We are at the UN, at the HRC, so we all share the common goal of advancing human rights."[9] With the proliferation of extreme right political groups across the globe and the backlash organized by so-called 'anti-rights groups,' multilateral spaces such as this are increasingly under attack (Ayoub and Stoeckl, 2024; Kuhar and Paternotte, 2018), including by member states.[10] The floor was first open for the delivery of general comments after the core group introduced the resolution.

The diplomats would move their state's nameplate from a horizontal to a vertical position to indicate they wished to speak. Several of them issued positive comments and thanked the core group for drafting the document, including the delegates from the European Union (EU), Panama, South Africa, Switzerland, United Kingdom, Austria, United States, Finland, Nepal, New Zealand, the Netherlands, and others. Some states also indicated they strongly supported the text and were prepared to join as co-sponsors of the resolution, among those were Iceland, France, Liechtenstein, Israel, Japan, Slovenia, Portugal, and more.

The first positioning against the document came from Pakistan's representative, who was sitting on the same side of the table as me, with only two chairs between us. He read the statement on behalf of the OIC, adding as a caveat the exception of Albania, which had not subscribed to it. The country, despite being an OIC member-state, detached itself from the OIC's opposition to the mandate years ago, breaking the group's consensus on the topic. Pakistan went on to affirm that there was "no universal consensus on the concept of SOGI," a reason why they had already opposed the establishment mandate in the past.[11] Moreover, they stressed that the family was a "fundamental unity" and "deplored" efforts to include words such as SOGI and the creation of "new sets of categories of rights," as they believed "international human rights law does not recognize SOGI as grounds of protected discrimination."[12] Moreover, the Pakistani delegate argued that SOGI goes against the "universality of human rights" and positioned both culture and religion as central elements in their reasoning for countering the resolution.

These aspects were echoed in other interventions friendly to Pakistan's statement. Iraq showed its concern that both the universality of human rights and freedom of religion and belief were being disrespected in an "attempt to create special rights because of SOGI."[13] Other recurrent arguments included that sexual orientation and gender identity were both unclear definitions and "outside the legally agreed human rights framework," as expressed by the Bahrain delegate, who also emphasized that such concepts were incompatible with the cultural and legal context of the country.[14] Libya labeled the resolution as an attempt to "impose Western values," as did other states. This would soon be challenged by Japan, which declared its support for the text: "It is not imposing values but supporting human rights."[15]

In the context of the rise of neoliberal economic policies in post-colonial states following globalization, Shalini Randeria identifies that a "cunning state," rather than a weak one, selectively adheres to neoliberal practices in accordance with the convenience of its national political project. To that end, they "capitalize on their perceived weakness in order to render themselves unaccountable both to their citizens and to international institutions" (Randeria, 2003: 2). Likewise, in the context of SOGI discussions at the Council, there are cunning states, too, that strategically mobilize the notion of culture to oppose sexual and gender-related rights. They employ "defensive relativism"(Cowell, 2023) to claim a monopoly over the definition of the national cultural traditions in opposing other states and dismissing activists' alternative accounts of cultural meanings. Similarly, they profit from anti-LGBTI + discourses to build a new (post-colonial) national identity and gather domestic support for a nation project built on opposition to sexual and gender diversity, while still admitting that any type of sexual practice not fitting their cultural understanding is because of their vulnerability before the imposition of cultural values by Western states (Adomako, 2022; Gosine, 2009). In this way, they manage to position themselves as simultaneously weak and strong actors in setting an agenda of sexual values. Interestingly, the position changes not depending on the actors involved but rather on how it may benefit the interests of a "straight-minded" nation-state.[16]

After each new speech, one could feel the tension building up in the room. Back then, I was not as familiar with these meetings as I am today, and I did not know if this was the regular atmosphere or if there was something particular about that day. As I learned later, that was not a usual meeting. Nervous laughs from diplomats could be heard during their speeches, and more and more anxious moving across the room. The tension reached its peak during Egypt's intervention. The delegate started by saying that the creation of the IE SOGI mandate had been the "darkest moment in the history of the HRC." According to him, it was an attempt to impose "sexual preferences" and "choices," "an empowerment by force and imposing a set of beliefs." For him (or for his state), this represented an attack on religion, and it was covertly "seeking to change marriage laws" and create "special categories of rights." It was an "imposition of racist and colonial ideologies." Furthermore, he added, "no one knows the scope of the mandate or the meaning of SOGI concepts," it could mean the protection to "have sex with trees" or even "it might mean freedom to have sex with children, pedophilia."[17] The uttering of this last word, so long inscribed in a discursive economy to establish the

abjection of homosexuality (Butler, 1997; Rubin, 2011; Weeks, 2018), had a clear effect on the room. One of the diplomats angrily tossed away the hearing device attached to his seat. Others looked shocked and whispered uneasily to people sitting next to them. After the meeting was over, I heard one diplomat turn to another as we left and say: "Oh my god! What was that?".

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The scene I described above summarizes many of the dynamics and arguments seen in international fora when SOGI rights are being debated. The arguments exploited by opposing states often rely on the concept of culture. As Sally Engle Merry has observed before, states mobilize the notion of culture as equivalent to a natural essence or identity, which would allow them to refuse certain human rights obligations (Merry, 2006). This operation shows a static understanding as well as a strategic employment of the idea of culture. Furthermore, it positions the state as the only actor authorized to provide the meaning of its culture, as if the shaping of culture were under its monopoly, even when activists in these same spaces are constantly introducing competing views about the meaning of their cultural practices.[18] As a consequence of this, states tend to present Western versus non-Western realities as inexorable binaries, introducing reified depictions of what the Global North and South both represent, and what they would each stand for as a group. The shortcomings of this binary opposition are one of the elements that civil society representatives are constantly trying to undo. From their perspective, state instrumentalization of gender and sexuality debates happens across global political spectra, with varied detrimental effects. To understand this dynamic, it is equally relevant to have a nuanced grasp of states' different motivations and institutional power within global governance structures, where Global North actors still hold much more leverage to influence decision-making (Anghie, 2005; Pahuja, 2011).

Activists are often frustrated by the fact that states with whom they normally work together on other human rights issues are on the opposing side of discussions on gender and sexuality. More importantly, many Global South activists mentioned how disheartening it is to have their own state against them. They also critically assess the behavior of many Western states with whom they have to ally in supporting SOGI. That is the assessment made by Stephanie,[19] who works with sexual and reproductive rights in a Geneva-based organization. She shared her analysis of the divide established between states, while rain poured outside the café where we met for the interview:

> The Global South is 100% right about development and about the North needing to contribute to that. And about you [the North] want us to guarantee these [SOGI and SRHR] in law, but we're trying to just get people food right now, you know? And saying, like, well, no, you have to focus on these rights when you don't have the infrastructure or the systems or the commodities, the food, all these other things… Acting like SRHR exists in a vacuum, and isn't related to other people's lives, is a failing tactic. And reinforces the idea that LGBTI rights or women's rights or reproductive or sexual lives are colonial impositions and Western agendas. Because that's all the West cares about pushing, or that's what they're prioritizing, rather than all these issues that really matter to people who live there. And if they keep

> ignoring that, that reinforces that narrative. The reason that narrative is effective is because it's partly true (Interview 9055 (2023)).

The description illustrates the ways in which Western states adhere to human rights discourse selectively (Douzinas, 2007). While they use SOGI as a homonationalist platform and to pressure many Global South states, they simultaneously withdraw from commitments relating to social and economic rights, which are central to those committed, for instance, to discussions regarding development (Hoad, 2018; Klapeer, 2018; Lalor, 2019; Rao, 2020). For Sarah, a civil society activist who has worked on these issues for more than a decade, this is one of the reasons why the argument of "Western imposition" remains so strong. She explained:

> There are a lot of issues that are extremely important for the global south countries, and they are right. They are right to want to talk about debt relief, racism, colonialism. Maybe they are instrumentalizing these issues, but you are making it easy for them to do so, because you [Western state] are refusing [to engage]. What will it cost you? And what would it take for you to include in your resolution meaningful paragraphs on economic, social and cultural rights? (Interview 4295 (2023)).

This division, seen at the state level, operates to maintain the status quo of global governance. It demonstrates how maintaining a binary divide between the 'West and the Rest' only benefits the former category of states. In this sense, the discussion that takes place among states equally reinforces both sexual and cultural binaries. The complete denial of sexual and gender diversity rests on the polarizing discourse according to which certain practices only belong in Western countries and cultures, even if much evidence indicates otherwise. Moreover, state debates are insistent on framing the issue as a binary contradiction between Western and non-Western values. This often allows Western states to instrumentalize SOGI in negotiations, but also to mobilize it in pinkwashing through their homonationalist practices (Baisley, 2016: 147; Mulé et al., 2016: 2254; Vance et al., 2018: 237). One diplomat shared with me her first-hand experience of observing these practices: "LGBT became a bargaining chip not to discuss topics of xenophobia and migration [for instance]. When the discussions started to touch upon a sensitive subject that [Western] countries didn't want to discuss, they would bring up LGBT to shift the focus […] it became a blocking instrument" (Interview 3647 (2023)).

Much of what Massad has described as the "missionary work" done by the Gay International is, in fact, currently carried out by states, which use their apparent progressiveness on sexual rights to justify (neo)colonial practices such as aid conditionality (Lalor, 2020) or illegal occupation of territories (Puar, 2017). This is reflected in the way states, and especially Western ones, adopt double standards in their commitment to human rights. "This is really apparent with Gaza," Sarah told me during our interview. She detailed: "If you consider yourself a Western democracy and you consider yourselves champions of human rights [and yet] you are aiding and abetting a genocide, there is no going back from that. So this argument [of Western imposition] is going to be even more successful now" (Interview 4295 (2023)). Civil society's action, as we will see next,

introduces a great deal of nuance to the binary terms of these debates; with careful consideration "not to replicate imperialist dynamics and to have the Global South in a leading role" (Interview 6914 (2023)).

Acting as civil society: The queer international

Massad's portrayal of the Gay International discussed above not only draws a different picture than the one I am trying to provide through this ethnographic account, but it also describes a form of activism that those of us committed to combating multiple aspects of structural domination and oppression should not subscribe to. As Judith Butler recently reminded us, "the resistance to colonization should be closely allied with the affirmation of queer, trans, and intersex lives" (Butler, 2024: 227). In this sense, the efforts to decolonize international (human rights) law and fight against homotransphobia are both part of the same task.

As discussed, the framework of the Gay International overemphasizes the agency of Western actors. At the same time, it downplays the agency of Global South activists and organizations. The new composition of transnational LGBTI + advocacy groups, increasingly led by activists from the Global South, sets new forms of understanding how this social movement engages or disengages with the notion of 'Western' values. Therefore, a new epistemological framework is also needed to make sense of it. That is why I suggest employing the idea of the *queer international* in referring to the current (and future) possibilities of anti-colonial transnational LGBTI + activism. I intentionally do not capitalize either *queer* or *international*. By capitalizing the "Gay International," Massad's reified analysis of "gay" activism indicates to the reader that this would be a coherent and monolithic group when, in fact, it is not. The queer international that I refer to is made of diverse forms of transnational and international activism, and disagreements and disputes over ideas are part of it. It is also not restricted to the coalition whose advocacy efforts I address in the following pages. It takes many forms through the hands of activists worldwide who mobilize human rights to combat both racism and colonialism and to fight for better lives for anyone within the broad spectrum of diverse genders and sexualities, regardless of their identities.

The term "queer international" has been used before by the US writer and activist Sarah Schulman. As she explains, she makes use of it as a "play on history, words, and movements past and present" (Schulman, 2012: 65) to describe a "worldwide movement that brings together queer liberation and feminism to the principles of international autonomy from occupation, colonialism, and globalized capital" (Schulman, 2012: 66). To Schulman's characterization of the queer international, I would add a few more reasons that underline my choice of new terminology, beyond providing a contrast to Massad's conceptualization of the Gay International. First, it suggests an ampler movement in terms of identities and non-identities; queer transnational activism is much more encompassing than only "gay" people. Second, it references the incorporation of many critical contributions of queer theory to the practice of activism. Finally, 'queer' became a transnational language. I have always been resistant to using the word 'queer' or any acronyms containing it in much of my activism or academic work in Brazil; I could never dissociate

it from its anglophone origins, and all the colonial history that came along with it. But I see it increasingly being mobilized and skillfully employed by activists in my country and elsewhere. As the queer becomes vernacularized in many parts of the world, I have recently caught myself using it even outside Anglophone contexts. It is a useful term to move beyond identity and provides an efficient common language for spaces of transnational activism while maintaining awareness of the multiple forms in which sexual and gender diversity materialize in different cultures.

The ethnographic scene that follows is meant to materialize one of the forms of expression of this broader movement, which is the queer international. In this sense, it addresses directly how civil society positions itself differently vis-à-vis states (Q3) and further demonstrates the recurrent intersection of discussions regarding colonialism and sexuality (Q1). Consequently, this section shows the impact that both colonialism and anti-colonial struggles have on the actions of queer transnational activism (Q2). Namely, examining the action of transnational LGBTI + activists at UN debates indicates the nuanced approach that these civil society actors take in addressing the delicate balance between advocating for sexual and gender diversity and acknowledging colonial power structures. In this sense, the account provides a contrast to the previously examined state discourse and practice on the matter.

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I arrived at the office of an NGO for what would be my first time following an in-person meeting of a global coalition of LGBTI + activists convening in Geneva. The building's architecture portrayed a blending of old and new, suggesting that, despite the marks left by time on the construction, it was once a fancy and modern structure. The headquarters of the International Service for Human Rights (ISHR) takes up most of the top floor. The conference space where we are meeting is one of the first rooms after you pass the dark glass doors that allow you into the workspace. The large room is filled with sunlight and extremely warm on this summer afternoon. From the wide-open windows, I can see the Palais des Nations and the tips of flying flags at its entrance. It is a privileged location where smaller NGOs would hardly be based. The conditions of the physical structure, however, are still strikingly modest when compared to the sophisticated facilities of many state missions I have visited in the city. A materialized reminder of the hierarchy that state-centric global governance perpetuates, and an illustration of the different positions occupied by civil society vis-à-vis states.

The coalition meeting today is one of the many formations over time of transnational activists gathering to work on issues of sexual and gender diversity. The gravity center of the current organizational format seems to be the mandate of the UN IE SOGI. Paradoxically, the mandate functions as both a catalyzing and a demobilizing factor of LGBTI + advocacy at the UN. On the one hand, the mandate's structure within the UN's special procedures branch provides a unique platform for LGBTI + activists to engage. As Oscar, a Latin American activist working at a Geneva-based CSO, highlighted, "the IE SOGI is crucial. That's why we're fighting a lot all the time for the renewal. We as activists, at least the ones that are here in the space, at the moment of renewal, we are just holding hands. You know, like a soccer game or whatever […] I think the IE SOGI has been like a beacon, a symbol" (Interview 7450 (2023)). The mandate provides an

unprecedented mechanism to produce new language on SOGI under IHRL. The IE is responsible for elaborating thematic reports, making country visits to assess the human rights situation, and sending communications to governments on matters of particular concern. It helps to materialize the notion of protected rights based on SOGI through its constant engagement and discursive production on the subject.

On the other hand, so much effort was put into the creation of the IE SOGI mandate that its approval in 2016 generated a feeling of 'mission accomplished,' which might as well function as a demobilizing element. It is what William, an activist from the MENA region long involved in these processes, explained to me: once the "momentum" of the creation of the mandate passed, "people felt that we achieved everything," and the activism coordination lost some of the strength it used to have in the past (Interview 3902 (2023)). After the mechanism was in place, direct transnational mobilization slowed down, and the renewal of the mandate became the new mobilizing factor, albeit seeing less and less involvement of activists each year. This is the central item on the agenda of the coalition meeting about to start, which takes place in the first week of the 50th session of the UN HRC, in June 2022, when the renewal of the mandate would be put up for discussion for the second time since its creation; the first renewal process had taken place in 2019.

The conception of the so-called *SOGI Coalition* can be traced back to 2003, when transnational queer activists started to mobilize around the idea that Brazil might present a resolution on the topic before the now-extinct UN Commission on Human Rights, the predecessor of the HRC. That is what Robert, who has been active in these activist circles since before then, told me. He also pointed out the fact that the coalition never assumed much of an institutionalized form and took different shapes throughout the years (Interview 7684 (2024)). Under the current composition, the meetings follow a horizontal structure, despite being coordinated by ILGA World and ISHR. It was agreed that a different organization would chair each meeting. It was a "shared responsibility." Decisions ideally need consensus. Anyone could suggest items for the agenda or indicate that a new meeting was necessary to discuss strategy. During the 50th HRC session, the group would meet more frequently than usual, reinforcing the centrality of the renewal of the mandate. Faces in the meeting rooms changed weekly, as activists from different parts of the world came to and left Geneva, attending the Council discussions for as long as their funding and organizational priorities allowed. While there were around 30 people in the first meetings, it was not unusual to see 10 or fewer as the days went by. The only constant presence, the Geneva-based organizations, were also the ones who held the 'practical knowledge' about the UN and the politics of advocacy in the Geneva spaces. This unavoidably creates a dependency of other civil society actors on these NGOs. If they did not share their knowledge, there was little the others could do.

For the duration of this session, the coalition meetings took place almost daily. Taking turns, activists shared updates and discussed strategic moves to be taken. Some of those included which states they had met and which they planned to meet, who each state was more likely to listen to, how they should address arguments brought up by the opposition, among other issues. In many instances, these were 'venting spaces' where activists would share their frustrations and often also direct criticisms to each other. They were as much a solidarity network to some as they could be a source of stress and anxiety to others.

In addition to ILGA and ISHR, other European-based organizations like COC Netherlands and the Swedish Federation for Lesbian, Gay, Bisexual, Transgender, Queer and Intersex Rights (RFSL) were present in most of the meetings. Feminist and 'mainstream' human rights organizations would often show up as well, even if inconsistently. These included Human Rights Watch (HRW), Amnesty International (AI), the International Planned Parenthood Federation (IPPF), the Swedish Association for Sexuality Education (RFSU), and others. Despite many representatives of the national NGOs outside the Global North attending different meetings throughout the session, the Global Interfaith Network for People of All Sexes, Sexual Orientations, Gender Identities and Expressions (GIN-SSOGIE), a South African faith-based group, was one of the few steady appearances of organizations whose head office was based in the Global South, alongside ILGA Asia. This issue would soon come up in discussions about the meanings of regional representation.

Two main tasks mobilized the coalition during the renewal of the IE SOGI mandate. First, approaching states to persuade them to vote in favor of the resolution, or even abstain, and sometimes to push for co-sponsorship. Second, drafting statements for interventions during the informal debates, the interactive dialogues, and the plenary sessions of the HRC. The first occupied most of the activists' time outside the meetings, while issues regarding the different statements monopolized a considerable amount of the internal discussions; it was not unusual for them to be the only topic during an in-person gathering.

The coalition established the priority of nationals reaching out to their own country when security restrictions allowed it. This had a twofold purpose. For one, states are usually more willing to listen to their constituents in multilateral spaces. As Marcia, an indigenous trans activist from the LAC region, noted, "people can see how international systems influence what is happening in the country and bring the issues of the country into these spaces. So I think it's a good opportunity to give visibility to the community and bring the issues" (Interview 6878 (2023)). A similar experience was described by one of the activists coming from the Caucasus region, who briefed the group on the productive conversation they had with the mission of their country in Geneva. The diplomat, who only agreed to meet them because they were a national, voiced their doubts about the resolution and also shared that they had been approached by 'anti-rights' groups. This demonstrates the concrete effects of having 'local' defenders engaging in advocacy in Geneva.

The second reason reveals concerns about agency and representation. Not only does it refer to the significance of having the advocates confronting states, fighting for their rights, and asserting the realities of the territories they live in and come from, but it also embodies their presence before states that claim their nonexistence. "I had bilaterals with Pakistan, Maldives, Malaysia, and Japan. Basically, about countering narratives that the rights of LGBTI people are Western impositions and just positioning the sexual and gender diversity again in this history of Asian cultures. Again, it's not like […] we just, you know, sprung from the ground post-colonization," tells Edward, who at one of the meetings had proudly shared his encounter with the Pakistani ambassador (Interview 9850 (2023)). The country is a member of the OIC and one of the most vocal against SOGI at the UN.

Statements to be read during this session of the Council was another issue that dominated the coalition's meetings. They were meant for the usual spaces where civil society was allowed to intervene. During plenaries and interactive dialogues with mandate holders, this opportunity was bound to come after a long list of speeches made by state delegates. These were the more formal slots, and the secretariat tightly controlled the list of speakers. Activists were more concerned, however, with another forum. What would they say during the informal consultations for the elaboration of the resolution renewing the IE SOGI mandate? More importantly, *who* would say it?

Working groups were created to draft each of the "pre-prepared statements." The coalition quickly agreed on the content, and volunteers were readily available. Anticipating what might come up in the discussions, four statements would be pre-prepared, and they would be edited on the day, depending on the direction the debate was leading. Two of the statements would be read during the general comments, and the other two were to be saved for the discussion of the resolution's paragraphs. The topics to be addressed were: 1) a general welcome of the resolution and the mandate; 2) freedom of religion and belief; 3) violence and discrimination, intersectionality, and the role of human rights defenders; 4) legislation criminalizing consensual same-sex sexual acts.

A dilemma regarding who should read the statements presented itself from the very first meeting and was a lasting item on the agenda. Debates over it revealed key concerns of the group that can be summarized mostly by the idea of *representation*. They wanted to ensure that the speakers embodied the diversity that grounded the coalition's legitimacy. This meant reflecting a multiplicity of often sub-represented social groups, considering race, gender, and sexuality. One issue, however, immediately assumed the spotlight and monopolized the discussions for several meetings to follow. Global South representation was indispensable. The urgency was summarized in a short and direct sentence by one of the coalition members: "No Western person should speak."

This concern also had a strategic dimension. Discussions about SOGI in international spaces often face the accusation of being culturally contingent. States, as previously discussed, frame it as an attempt to impose Western values, whereas LGBTI + would not exist in their country. However, as I looked around the room, the majority of faces I saw were of people coming from the Global South. Both those defenders who were brought to Geneva, funded by bigger NGOs to attend the Council session, and those who worked for these same big European civil society organizations. In this sense, there was no match between the origin of the organization and those working in it, and looking beyond the institutional frame allows us to see how Global South activists actually meaningfully influence the decision-making process. Several years ago, it would have been hard to believe that an organization like ILGA World, for instance, which had its first meeting in 1978 to found an "association of European gays" (Law Reform, 1978: 2-2–78), would today have a majority of non-Western activists on its staff.[20] In this sense, the ethnographic account of debates around representation also render a very concrete example of the impact of colonialism on activist action (Q2). Despite their critical awareness of both the effects of coloniality (Lugones 2007; Quijano 2000), and their own insider knowledge about the composition and diversity of the movement, activists were still compelled to engage in the 'game' of the state. That is, they resorted to *essentialized* representations of

identities, that many of them would not agree with, precisely because this was what the institutional arrangement of these state-led spaces demanded; something that is recurrent in juggling between forms of comprise that would make the claims of advocacy both visible and impactful (Rao, 2014).

Everyone agreed that Global South representation was essential, but not on how this could be achieved. In this sense, it was evident that also Global North activists shared the same *decolonial concerns* as those coming from non-Western backgrounds. The disagreement within the coalition was segmented into two matters. One centered on whose 'ECOSOC accreditation' would be used to deliver the statements. The accreditation is granted to civil society organizations accepted as observers before the Economic and Social Council. This allows them to join and speak at UN fora, like the HRC. The disagreement was that some of the advocates insisted it was important for "the ECOSOC of Global South organizations to be used" for the statements. This translated into mentioning that the one speaking was doing so on behalf of said organization. The problem was that only *one* Global South NGO present there had the accreditation. This reveals a structural problem of access to the UN system by advocates outside Europe and the US. The Brazilian organization ABGLT was the first LGBTI-led organization outside the Global North to ever be granted this status, and this was not until 2009.[21] In addition, there was the issue of how ILGA World was differently categorized by many present. While some maintained that it was a Global North organization, others were assertive in refusing that label, as ILGA is a global NGO federation.

Contrarily, what others argued was that all the statements were being prepared and would be read in the name of the Global Coalition, which, in their view, gave a more robust legitimacy to their claims. Therefore, the accreditation was only a procedural element to allow the coalition to take the floor, and it did not matter whose it was. A mix of fear and a quest for visibility kept this discussion going for many days. While some NGOs felt it was important to have specific names mentioned, there was also general a anxiety about how the opposition might instrumentalize even the smallest procedural mistake to undermine the participation of LGBTI + NGOs in the Council. The solution to this first problem was the only one that seemed available: the statements would start with a mention of the ECOSOC-accredited organization and declare that it was delivered in the name of the coalition. This meant the official slots were provided by two Global North organizations (ISHR and RFSL), one Global South (GIN-SSOGIE), and ILGA World, whose status as either north or south was disputed.

Once the ECOSOC issue was overcome, the choice of speaker consumed the time. The list with the four names changed at least half a dozen times, in an ongoing attempt to balance the many identities that different people thought it was important represent. The speakers should embody all the diversity from the Global South, but also show a multiplicity in terms of ethnicity and sexual and gender expression. The excessive concern with identity markers gave rise to accusations of tokenism within the coalition. A coalition member who was chosen to read one of the statements shared her concern about reading what was drafted by others, and the need for the statements to incorporate meaningfully the suggestions provided by the speakers:

> When you bring in a woman from the global south or from multiple intersections you bring in a different perspective. Those perspectives need to be reflected in what is read out. When you respond to the OIC states, you must respond with an understanding of Islamic cultural codes, and respect for Islamic states and laws. We have to find the right pitch and right balance.[22]

This allowed for different actors attentive to the effects of colonialism to substantially inform the content of the final statements to be read, which introduce much more nuance in when addressing the intersection of cultural and sexual diversity. This situation also illustrates that the essentialized mobilization of identity was sought to showcase a diversity that was already in place and that already informed advocacy action. Her intervention is also attentive to racist and colonial tropes that are often seen in homonationalist discourses, which instrumentalize sexual and gender diversity. "An understanding of Islamic cultural codes, and respect for Islamic states and laws" is something that participants of the Gay International described by Massad would never advocate for. However, as I have suggested, the current picture of transnational LGBTI + activism is much more complex than that. In the queer international, activists are not only aware of forms of asymmetry and domination resulting from (neo)colonial practices, but they are also actively attempting to oppose them.

The choice of speakers was strategic because activists wanted states to see their diversity; they needed it to be drawn in front of them. But it was also something else. The speakers shared a range of subaltern positions, and as I saw them rehearse the speeches, anxious about what was to come, I thought of how that symbolism was important, for them as well as for me, watching them. And for all other activists worldwide who would see a picture on social media with the caption about queers of color taking the floor at the UN.

After so much debate, the first informal consultation went by without time for civil society to intervene. Activists stood and watched discussions that were triggering to many of them, who left the room crying in the end. They endured the associations of homosexuality with pedophilia, and insinuations of sex with trees, without being able to counter them at the end. More than one diplomat confided in me that they had never seen anything like what happened that day in any multilateral space before. The level of verbal violence displayed by some state representatives was striking and unprecedented. When they were finally heard at the second informal, the coalition members were also able to stress their different identities at the very start of their speeches: "a bisexual activist from Armenia," "a proud lesbian woman from Thailand," "a decolonial intersectional human rights feminist from Sri Lanka," and "a non-binary queer human rights defender from Peru." These introductions tried to summarize all the sub-represented elements that many in the coalition felt needed to be evidenced through their participation in international fora. In the intervention addressing "punitive and criminalizing laws and policies that drive violence and discrimination based on SOGI," the coalition recalled that some of these laws "are remnants of oppressive colonial legislation forcibly imposed upon colonized peoples." Likewise, the statement focusing on freedom of religion and belief emphasized that

> Throughout the world, diversities of sexual orientation as well as gender identities and expressions have long existed, and form an integral part of cultures and traditions. […] These rich traditions of gender and sexual diversity in many indigenous communities have historically been celebrated, yet have also faced brutal repression through colonialist ventures.[23]

The excerpt above introduces one of the discursive forms among the many employed to present a similar message. One which I constantly heard when talking to Global South activists in Geneva and elsewhere: "Homophobia, *not homosexuality*, is an import from the West."[24] As has been the case in the more general trend of transnational LGBTI + activism and research (Bakshi et al., 2016; Horswell, 2006; Jackson, 2001; Magaqa and Makombe, 2021; Oyěwùmí, 1997), activists engaging at the UN level through their participation in meetings or organization of side events are increasingly trying to offer a decolonial account of the history of sexuality as an alternative to some of the mainstream chronologies accepted, especially, by state actors opposing SOGI rights. While accommodating many different views within the coalition on how to ensure Global South representation through the choice of speakers, the activists were also careful to expose the role of colonialism in the content of their speeches. The initial command was followed: No Western person spoke.

Conclusion

For a long time now, decolonial and post-colonial theoretical reflections have infiltrated LGBTI + activism. The incorporation of many concepts has led to changes in the way transnational civil society organizes itself around the issues of SOGI. Although at the state level there are repeated attempts to restrict the discussions as an opposition between the 'West and the Rest,' people advocating for SOGI rights at the UN come from all regions of the globe and hold contrasting backgrounds. The awareness of the inequalities produced by colonial rule and of the cultural differences regarding issues of gender and sexuality is ever-increasing, and the ethnographic account above demonstrated how an approach to this issue varies deeply depending on the distinct positions occupied by states and civil society actors (Q3).

Transnational LGBTI + organizations have changed dramatically since they were founded. A lot of these changes also followed concerns regarding the general lack of representation of the Global South in big mainstream human rights organizations responsible for the advocacy work in Geneva and how this would be disconnected from the 'reality on the ground.' The advocacy work for the renewal of the IE SOGI mandate described above was undertaken by a coalition of activists coming from all regions of the globe. All the decisions during this period were taken collectively by the group, and all actors engaged equally with advocacy with member states. This illustrates the increasing and central role that Global South activists occupy in the making of queer advocacy, providing an answer to the research question (Q2) about how the intersection of discussions on colonialism and gender and sexuality influences activist action.

There was almost no meeting where issues concerning cultural differences and Global South representation did not come up. The ethnographic account of these instances offered an empirical answer to the first research question (Q1), which asked how debates about both colonialism and gender and sexuality come together at the UN HRC. It was usually in discussions among Global South activists themselves. There were two main aspects to these. The first regarded a legitimate concern that the coalition of activists should embody cultural diversity. Not only as a way to show the diversity of the group, but rather as an 'ethical principle' to be followed, in concert with the type of activism envisioned by the group and steering clear from tropes perpetuated by colonialism. The second dimension was strategic; it combines the internal demands for representation with the need to demonstrate the presence of gender and sexual diversity worldwide, particularly in the countries whose representatives openly oppose SOGI and deny the existence of sexual diversity in their territory. In this sense, the contrast between binary discourses adopted by states and the nuanced position assumed by civil society actors is clear.

Above all, I illustrate with my ethnographic account how queer transnational networks make efforts to overcome years of Western domination in LGBTI + groups, much of which is a product of colonialism. Massad's framework shares some of the same tropes observed in the relationship between Western and non-Western *states* when approaching issues of gender and sexuality; actors whose roles he nevertheless fails to acknowledge. In this sense, his theory is not suited to grasp the complex shapes these debates take within queer transnational civil society. The queer international not only advocates for SOGI rights, but also for an approach to international human rights law that dismantles colonial understandings and practices.

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ORCID iD

Rafael Carrano Lelis https://orcid.org/0000-0002-1794-8135

Notes

1. Quotation based on the fieldwork notes.
2. The term "queer" is employed throughout the article not as an identity but as a descriptor of heterogeneous groups of people who share a subaltern position because of their actual or perceived diverse sexual and gender expressions, as well as those advocating for the end of violence and discrimination based on those aspects. See more in the Section 'Acting as Civil Society' below.
3. Belmonte (2021a); Churchill (2009). This does not mean, of course, that other formats of social and political organization of sexual dissidents did not exist, even if heavily deterred by widespread criminalization. For accounts of these earlier forms of political organization, especially offering a global/transnational perspective on the 'homophile' movement, see Rupp (2011).
4. The sites visited were: 1) IHLIA LGBTI Heritage at the Open Library of Amsterdam; 2) the International Institute for Social History (Amsterdam); 3) Hall-Carpenter Archives at the London School of Economics; 4) Bishopsgate Institute (London).
5. The sum of the break-up numbers per category (77) is higher than the total amount of interviews (65). This is because many of these actors circulate in those three different circles. Therefore, sometimes I interviewed one person currently working for an NGO but who used to be a state delegate; or someone who at the moment is a human rights officer at OHCHR, but who used to advocate on behalf of an NGO; and so on. Therefore, sometimes one person (and one interview) may fit into two categories at the same time.
6. While Massad's analysis missed a lot of nuance *already present* in the transnational movement then, as I briefly illustrate with the mention of protagonism of Latin American activists as well as the 'Third World Lesbians' Statement' below; the ethnographic evidence presented in this article focuses much more on demonstrating how, even if we accept Massad's framework was once accurate, it is no longer the case. A broader argument challenging Massad's conclusions beyond the temporal limitation I introduce in this article requires the analysis and collection of different type of data, something that falls outside the scope of my contribution here.
7. Who were active long before Beijing. See, notably, the 'Third World Lesbians' Statement' made during the Lesbian Press Conference in Nairobi in 1985, when the III UN Conference on Women was taking place: "It has often been assumed that lesbianism is a product of decadent capitalist societies. We refute this argument and make our existence as Third World lesbians and lesbians of color everywhere known… If it seems that lesbianism is confined to white Western women, it is often because Third World lesbians and lesbians of color come up against more obstacles to our visibility… But this silence has to be seen as one more aspect of women's sexual repression and not as a conclusion that lesbianism doesn't concern us… The struggle for lesbian rights is indispensable to any struggle for basic human rights. It's part of the struggle of all women for control over our own lives." See Bunch and Hinojosa, 2000: 432.

8. The initiative of the process was spearheaded by South Africa. However, as the country was not in the membership of the HRC that year, Brazil (who was a member) joined South Africa in introducing the resolution (United Nations, 2012: 192).
9. Quotation based on the fieldwork notes.
10. Something exemplified, for instance, by the US withdrawal from the Council during the Trump administration. See: (Borger, 2018).
11. Quotation based on the fieldwork notes.
12. Quotation based on the fieldwork notes.
13. Quotation based on the fieldwork notes.
14. Quotation based on the fieldwork notes.
15. Quotation based on the fieldwork notes. Entering the important debate of how much of human rights discourse is itself underpinned by (neo)liberal and colonial values is beyond the scope of this article, which analyzes states' claim that SOGI is an imposition that falls even outside of the human rights discourse. For a well-documented recent analysis of the former, see Whyte, Jessica. *The Morals of the Market: Human Rights and the Rise of Neoliberalism*. London and New York: Verso Books, 2019.
16. On the concept of the "straight mind," see (Wittig, 1980). About the idea of building a "heterosexual nation" see (Curiel, 2013). For more perspective on the "heteronormative" possibilities of a nation-state, see also (Otto, 2018; Puar, 2017).
17. Quotation based on the fieldwork notes.
18. For a similar argument in a national context, see: (Adomako, 2022).
19. All the activists quoted had their names replaced by aliases randomly generated by software. When geographical, linguistic, or cultural references are vague or very broad, they are usually made to preserve the identity of the research informants. The number for each interview is also randomly attributed by software, and they change between different research outputs in order to avoid the identification of informants through the cross-comparison of different articles.
20. See ILGA World Staff List available at https://ilga.org/about-us/staff/.
21. See https://esango.un.org/civilsociety/consultativeStatusSummary.do?profileCode=6800.
22. Quotation based on the fieldwork notes.
23. Quotation based on the fieldwork notes.
24. Quotation based on the fieldwork notes, my emphasis.

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Rafael Carrano Lelis is a Max Weber Postdoctoral Fellow at the European University Institute (EUI).