



The EU approach to Gender: Limitations and Alternatives

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For several decades, the European Union has been at the forefront of significant progress in the struggle towards equality between women and men, among others in the fight against sex-based discriminations. The contemporary EU approach to gender has however become much more interested in representations and social norms. This paper analyses this stance and highlights its deficiencies – more specifically, it looks at the flaws entailed in an excessive focus on “gender stereotypes”. Finally, it briefly sketches out the principles of an alternative.

INTRODUCTION

Despite decisive progress in recent decades, much remains to be done in terms of inequalities between the sexes within the EU. Most data converge to confirm that women continue to bear the greater burden of domestic tasks and childcare. For most women, combining a career and family life remains a

huge challenge.² Women also care for older dependants more often than men do. Another famous inequality concerns wages: there is still a significant pay gap between women and men. Women are underrepresented in decision-making processes and positions, particularly at the highest level. This is not due to a lack of competence, for women count for half of the workforce and more than half of new university graduates in the EU. Women are also disproportionately more likely to be victims of all forms of domestic violence – including physical violence, sexual harassment, rape, sexual violence and harmful customary or traditional practices such as female genital mutilation, forced marriage and honour crimes. About 20% to 25% of women have experienced physical violence. An overwhelming majority of ‘single parent families’ are single women with children. This situation tendentially leads to impoverishment, precariousness, difficulties in the job market and less good physical and mental health. One can legitimately wonder: what does the EU actually do to eliminate such injustices?

This policy brief looks at the EU approach to gender from a critical perspective: after being at the vanguard of several advances in the fight against discrimination, the EU seems to have become less efficient in that field. On the other hand, it has integrated and promoted the mainstream view that gender stereotypes should be the main target of policy-makers in resolving the injustices affecting women. As a result, the EU experts on that topic seem to abide by a very ‘constructivist’ approach that distinguishes them from the essentialist and ‘differentialist’

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in the literature on women in recent decades. After briefly analysing this view, we will point at several of its deficiencies. Finally, we will rapidly sketch the general principles of an alternative perspective on this issue, which should avoid the constructivist trap as well as that of essentialism.

THE EU APPROACH TO GENDER

From a legal fight against discrimination...

The EU has been at the forefront of the fight against discrimination based on gender (and on ethnic, religious or cultural grounds) for the last four decades. A strong legal basis exists in that field.¹ The 1957 Treaty of Rome already emphasized the principle of equal pay for equal work. (Article 119 EEC, then 141 EC, now Article 157 TFEU). In 1976, the Court of Justice of the European Union (CJEU) added a social aim to Article 119 EEC. And indeed, from 1976 onwards, the EU adopted several directives tackling gender-based discrimination: this legislation concerned equal opportunities and equal treatment of men and women in the labour market and in social security, parental leave and on the safety and health at work of pregnant workers and workers who have recently given birth or are breastfeeding. With the Treaty of Amsterdam in 1999, the promotion of equality between men and women became one of the essential tasks of the European Community (Article 2 EC) and the EU received the competence to combat further discrimination based on gender (Article 13(1) EC, now 19(1) TFEU). The Charter of Fundamental Rights of the European Union prohibits discrimination on any grounds, including sex, (Article 21) and highlights the necessity of positive action in that respect (Article 23). In the Treaty of Lisbon (2009), equality between men and women was declared part of the common values of the EU (Article 2 TEU). Promoting equality between men and women also appears among the tasks of the Union (Article 3(3) TEU).

In 2010, the Commission adopted a strategy for equality between women and men (2010–2015).

It outlined six priority areas: equal economic independence for women and men; equal pay for work of equal value; equality in decision-making; dignity, integrity and ending gender violence; promoting gender equality beyond the EU and horizontal issues.⁴

Several instruments were put in place to implement this strategy. For instance, the European Commission has allocated about €8 million to projects preventing and struggling against violence committed against women and girls within the EU.⁵ In addition, the victims' rights directive was recently adopted: it guarantees a minimum level of rights for victims across the Union: the right to clear and understandable information on proceedings, the ability to participate actively in criminal proceedings and the benefit of victim support services.⁶

An assessment of this strategy shows that it has led to a better knowledge of the various dimensions of gender inequalities, to a greater awareness within the population and policy-makers of the necessity to address gender inequalities, and the elaboration of models and indicators in favour of gender mainstreaming. However, some evaluations have also highlighted the fact that progress has been uneven across the priority objectives.⁷ The achievements have been greater in the better focused priority areas, like gender equality in decision-making and violence against women. Two main defects have been highlighted in these assessments: first, a lack of sufficient resources for effective implementation, because no budget has been earmarked for the strategy; second, the obvious deficiency caused by the weak institutionalization of gender mainstreaming in the EU decision-making process. Overall, the strategy seems to have produced positive effects regarding agenda setting, innovation and learning dimensions, but much less in terms of practical change. And indeed, the Gender Equality Index 2015 of the European Institute for Gender Equality shows only marginal progress towards gender equality between 2005 and 2015.⁸

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achieved over the last few years. For example, in November 2012, the European Commission proposed a draft directive imposing a quota of 40% women among non-executive directors of companies listed on stock exchanges by 2020. The bill has been approved with amendments by the Parliament but is still under discussion in the Council.⁹ On the other hand, the maternity leave directive proposal, presented for the first time by the Commission in 2008, has not been adopted after the co-legislators – Parliament and Council – could not reach an agreement. The Commission has decided to withdraw the initiative in order to put an end to the current stalemate and open up the way for new initiatives.¹⁰ It might be useful to note that the withdrawal of this directive took place as a consequence of its agenda for ‘better regulation’. The latter has indeed pushed the Commission to get rid of 80 legislative propositions, using the argument that it is necessary to cut ‘red tape’ and to reduce the number of European regulations. For some, this is proof of the deepening of an economically liberal agenda, while others perceive this orientation as a response to the eurosceptic arguments against the ‘Brussels bureaucratic monster’.

Therefore, the struggle for more equality between the sexes seems to have somewhat stagnated at the European level, although so much remains to be done. I would now like to concentrate, in a critical way, on one of the main focuses of the EU in dealing with this crucial matter.

...To a focus on stereotypes

For the last two decades, one approach has become largely hegemonic in policy circles as well as among academics working towards equality between the sexes, namely an approach focused on the elimination of ‘gender stereotypes’, perceived as the main cause of both apparent differences in behaviour and preferences according to sex, and of the enduring inequalities between them. This vision seems to have penetrated the work done at the European level, particularly when it promotes

‘soft law’ or awareness-raising. More specifically, it pervades most of the recent reports and resolutions emanating from the European Parliament and the European Commission.

A first characteristic of this general approach to gender is to oppose the reproduction of prevailing clichés of the feminine and masculine. These presumptions are very broadly defined. For instance, we are told that boys are educated to focus on the outside world, while girls are supposed to be more suited to the domestic world, and that this is not neutral. Girls are also said to be taught to accept authority, while boys are expected to challenge it.¹¹ Other stereotypes viewed as problematic involve limiting girls to a future role as mothers or putting too much emphasis on their appearance, and not introducing boys to qualities and skills such as emotional literacy or domestic tasks.¹²

In addition, these very broadly defined stereotypes are seen as explaining the different roles socially attributed to individuals according to their sex. For example, we are told that ‘Traditional gender roles and stereotypes still exert a great deal of influence over the division of labour in the home, in education, in careers, in the workplace and in society in general.’¹³ The target of criticism is very much the education system: ‘educational institutions that practice gender segregation, and education materials often contain stereotypes that help to perpetuate the traditional separate roles assigned to girls and boys.’¹⁴ We are also told that ‘gender stereotypes assign different, determined and limited roles to women and men’ and that ‘these roles are . . . disseminated or reproduced by parents, education and media . . . integrated by individuals during the socialisation phases of childhood and adolescence and therefore influence their lives and might limit women’s and men’s personal development.’¹⁵ These stereotypes are said not only to ‘influence choices throughout their lives’ but also to have ‘strong implications for the labour market, where women still face both horizontal and vertical segregation.’ In the end, this ‘contributes to certain sectors still being considered “male” and their pay levels consequently being higher than those of sectors considered “female”.’¹⁶

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to be viewed as unilaterally negative, but all positive discourses on difference are also disparaged as being part of a form of ‘benevolent sexism’ rooted in a naturalist discourse. By this, researchers and policy-makers mean, for instance, the postulates according to which women are expected to be able to encourage a new, more ‘feminine’ style of governance, based on intuition, empathy or the ability to negotiate. This approach is criticized because it tends to limit women to particular functions and tasks.¹²

Lastly, these gender clichés are perceived as the main causal factor explaining pervasive inequalities between women and men. Thus, we read that ‘Gender roles continue to influence crucial individual decisions: on education, on career paths, on working arrangements, on family and on fertility. These decisions in turn have an impact on the economy and society. It would therefore be in everyone’s interest to offer genuine choices equally for women and men throughout the different stages of their lives.’¹³ We also read that ‘Gender stereotypes and traditional structures have a negative impact on health and universal access to sexual and reproductive health and the associated rights.’¹⁹ These stereotypes are very much attributed to different sorts of education given to children: ‘little boys and little girls do not learn the same things at school; by the same token, men and women are not treated equally in life.’²¹ For example, the gender pay gap, in addition to being due to discrimination (not the same pay for the same work) is also partly attributed to the fact that women and men still tend to work in different sectors and jobs, and that women spend more time raising children and looking after the household.²² In other words, what explains remaining inequalities between the sexes ‘has to do with stereotypes which legitimize inequalities, with men and women frozen in their respective complementary roles based on their expected behaviors and bound by formal “rules” they cannot infringe.’²⁰

‘Gender neutrality’ and education

Certainly, the contemporary EU approach to dealing with inequalities between women and men still includes classical recommendations for public policies, such as creating more affordable and flexible childcare and family services or imposing quotas for the representation of women in top positions. However, over the past few years, many recommendations have tended to focus on breaking stereotypes – and this is perhaps linked to the relative inefficiency of the ‘hard law’ perspective. Huge emphasis is now put on the necessity to ‘change mentality’ and, more specifically, to modify our general categories for the ‘feminine’.

Even the eradication of violence against women is said to require a struggle against stereotypes: ‘in order to effectively combat violence against women and impunity, a change of attitude towards women and girls is necessary in society, where women are too often represented in subordinate roles.’ Thus, in addition to punishing offenders and supporting women’s shelters and organisations working to support women who are victims of gender-based violence, it would also be necessary to combat gender stereotypes and discriminatory socio-cultural attitudes from an early age onwards.²³ The Parliament also calls on the Commission and the Member States ‘to raise awareness of stereotypes, sexism and traditional gender roles in the education and media sector’ and to promote a balanced, non-stereotyped image of women.²⁴ This quest for ‘gender neutrality’ can sometimes sound like a very forceful goal: ‘challenging representational systems and driving out (from birth but especially in schools) anything which encapsulates so-called “male” and “female” behaviour.’²⁵

The solutions proposed suppose an involvement of public authorities in education policies, in order to create a more neutral approach to gender in the way teaching is carried out, in curricula and in the manner in which teachers are trained. Public authorities are asked to promote courses about and research into the significance and scope of gender equality as part of tertiary education, notably by including gender-equality-related subjects in syllabuses, introducing specific postgraduate courses and

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encouraged to foster gender equality in educational institutions and to see gender education as a fundamental part of the curriculum and school programmes; in line with the Istanbul Convention, Member States are pushed to include teaching on non-stereotyped gender roles.²⁷ In the same perspective, girls and boys should be encouraged to take an equal interest in all subjects, beyond gender prejudices. For instance, girls should be incited to study scientific and technical subjects, while boys should learn about activities usually perceived as feminine, such as domestic work and care. Member States are also asked to eliminate stereotypes and sexist distortions from textbooks in order to change the behaviour and identity of girls and boys, and to develop or reinforce national regulations fighting against stereotyped gender roles in the media and advertising.²⁸

PROBLEMS AND LIMITATIONS

This vision has been very much disparaged by the opponents of ‘gender theory’ in a somewhat over-the-top and apocalyptic way. These opponents have lumped together various intellectual and militant movements, which they all presume to abide by the same political project, namely the abolition of sexual differences, the promotion of a new postmodern approach not only to gender but also to sexuality, and the encouragement of feminist visions – all perceived as anti-men – and of homosexual and transsexual rights and visions alike.²⁹

Without falling into such caricatures and approximations, it might be useful to question some of the assumptions pervading mainstream views on gender. In other words, the long-term objective in that field should be to invent a ‘third way’ between radical constructivism and radical essentialism. And for that purpose, the notion of difference between the sexes has to be totally refurbished. But first, let us examine the limitations of the mainstream approach to gender.

Firstly, the causal link postulated in this view between, on one hand, gender stereotypes, and on the other, differences and inequalities between the sexes is extremely problematic. This link is always a postulate from which other arguments follow but it is never proved.³⁰ It is assumed that stereotypes actually explain both differences and inequalities between women and men (the two often being amalgamated as we have just seen earlier). Nonetheless, this assumption cannot be easily demonstrated. Since boys and girls and women and men continue to be educated and socialized differently, it remains largely impossible to assess the extent of the innate versus the constructed parts of the ‘feminine’ and ‘masculine’ clichés. Of course, one can show that there is a distinct socialization according to sex, but one cannot prove that the origin of this distinction lies in these stereotypes. Essentialists could indeed retort that if we raise boys and girls differently it is because of deeper and more fundamental biological differences. They would therefore reverse the causality. For them, stereotypes are not the cause of behavioural differences but instead derive from them as the product of innate differences. What is actually proven by recent research is the impact of socialization on preferences, behaviours and abilities. But again, that does not mean that prevailing ideas about the ‘feminine’ and the ‘masculine’ are causal factors either for the differences or for the inequalities between the genders.

In the end, by being ourselves immersed in our society (and socialised like every other average individual), we are all inevitably imbued with these stereotypes. Therefore it seems a logical and empirical impossibility to either prove or disprove the causal effect of gender stereotypes on behaviours and mentalities. If one adds to that the impact of socialization on biology (through the plasticity of our brains³¹ and genes³²), much research on this issue then loses most of its relevance: even if one admitted the causal impact of stereotypes on differences and inequalities between the sexes, one would then have to take into account the impact they would have not only on behaviours and mentalities but also on actual biology. This would then make it

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solutions
proposed by the supporters of the gender
approach, to which we will return in a moment.

Secondly, this vision deploys a generally negative and unilateral vision of differences between the sexes, as being either an equivalent to or necessarily leading to inequalities. Yet, what progressives should be attacking is injustices in general and, more particularly, relations of domination that contradict individual freedoms, not differences as such.

The focus on the alternative between unity and diversity or identity and differences has become a widespread one in social sciences as well as in public debates at least since the 1970s. This is what some have called the ‘cultural turn’. The ascent of new social movements, issues and claims seemed to question the old materialistic framework of progressives and incite them to work on post-materialistic issues. Post-structuralism and postmodern visions have been part of that movement. This intellectual evolution in Western progressive thought had an impact on the approach to gender. The work of Judith Butler in particular seemed to embody this new preoccupation with a radically constructivist approach in which sex – and not just gender – was perceived as a social construction, a perspective according to which the more widespread the differences the better, as long as it was the outcome of a free individual choice. On the flip side of this polemic, a more conservative view has gained ground for the last decades, which, although radically distinct from an ideological point of view, does share common points with Butler’s constructivist approach. Indeed, the opponents to radical constructivism have been trying to revive a sort of essentialist approach to gender, according to which differences between the sexes are not the product of social norms but rooted instead in innate biological differences. In this camp, too, the focus is on differences, albeit in a more rigid, essentialist and conservative view.

The mainstream approach to gender has been partly influenced by the radical constructivist camp but its main focus now seems to be with

eliminating socially constructed differences, perceived as inherently linked to inequalities. Yet, a unilaterally negative approach to differences between the sexes is very unlikely to find an echo among the average – male and female – population, since most individuals do seem to think not only that there are irreducible differences between men and women but also that this is a positive thing. The challenge is therefore to elaborate a vision that would clearly go against relations of domination without discarding the existence of such differences. It is about voicing a vision of the ‘feminine’ (and the ‘masculine’) which would enable women to get involved in their own liberation as well as the struggle for freedom in general, a sort of ‘emancipatory differentialism’.

A third flaw of this approach lies in the alternative propositions it makes for attaining equality between men and women. The very strong focus on an alternative education reflects a sort of idealistic bias and presents the potential danger of perfectionism - I am using here the philosophical definitions of these terms. The mainstream approach to gender is indeed idealistic in a classical sense: it supposes, first of all, that ideational factors – beliefs, representations, ideas – are the causal factors for real inequalities between men and women; and secondly, it proposes solutions specifically aimed at changing these representations.³ By doing so, it tends to overlook relations of power justified by these representations as well as more objective – material or biological – factors potentially contributing to these inequalities.

Furthermore, these propositions entail the risk of ‘perfectionism’⁴: by pushing for a new sort of ‘gender-free’ society and by using school curricula to convey these new perspectives, they run the risk of justifying the imposition by the state over a whole population of a specific ‘conception of the good’, perceived as inherently superior. To be told what it should mean or not mean to be a girl or a boy could indeed run counter to the individual freedom to build one’s own vision of the good. Certainly, questioning gender-based socialisation could increase the freedom of individuals by liberating them from pre-established expectations and categories.

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to the 'masculine' perspective. This approach results in a reverse, but still dogmatic, trap.

CONCLUSION: FROM GENDER TO FREEDOM

This paper has attempted to highlight some of the limitations of the approach that currently prevails in the European institutions about the inequalities between women and men. As we have seen, the classical anti-discrimination perspective has reached its limitations in the fight against the many injustices still affecting women. Furthermore, the 'hard law' approach achieved through legislative propositions seems to have become secondary compared to a more 'soft law' perspective. This has gone hand in hand with a lack of resources allocated to the objective of reducing inequalities between the sexes. On the other hand, a very strong focus on gender stereotypes has become visible in the EU institutions' take on this issue. Yet, as we have shown, this notion is problematic in many respects.

I would now like to outline a few potential alternative principles to this approach. Because of lack of space and because I have tackled this dimension in other publications, I will sketch these points only briefly.

First of all, it is important to recognize the validity and legitimacy of measures intended to act upon mentalities and representations. Nonetheless, the way in which this symbolic work is carried out has to be questioned. Indeed, it would be very idealistic to suppose that consensual representations can be transformed mainly through education and alternative discourses. Such a view grants a transformative power to ideas, whereas these impact on reality only when they connect to interests and take into account structural and material constraints. In other words, it is an illusion to think that gender stereotypes are the cause of the injustices affecting women, in the same way that it is mistaken to believe that removing them will magically eradicate these injustices.

Gender stereotypes are problematic in so far as they contribute to justifying or reinforcing existing inequalities³³. But they are not necessarily the reasons for the latter. Any attempt to prove that these clichés are the actual causal factors for dominations or inequalities affecting women will always fail since, on the one hand, the subjects tested are always themselves socialised into the mainstream views of the 'feminine' and the 'masculine' and, on the other, socialisation does not leave the mind nor even the body untouched – as shown by recent data on cerebral plasticity and epigenetics. In the end, the debate between what is innate or constructed when it comes to differences between the sexes is simply impossible to settle. And, most importantly, this narrow controversy leads us to overlook what should be the true priority – namely, building the conditions for effective freedom for all. This presupposes the denunciation of discourses that legitimise women's inferiority but does not necessarily postulate that those narratives actually create such disadvantages.

Furthermore, a credible vision for female emancipation also requires the adoption of a far more propositional than merely critical stance. If women are to support the measures contributing to render them less vulnerable, there should be a persuasive and appealing long-term project that is not limited to criticisms. And this alternative project cannot only consist of getting rid of stereotypes. Such a project needs to put the goal of individual freedom at the forefront and not exclude the hypothesis that there might indeed be some inextricable differences between the sexes. It is fundamental to stress that differentialist discourses that support or justify domination are the problem, not differences as such. In other words: a new and appealing project for women should articulate general principles of justice rather than focus on the opposition between difference and similarity. A narrative built around the principle of effective freedom could accommodate the various needs of contemporary women without counteracting their deeply held conviction that they still remain different from men. Being free to elaborate and put in practice your own vision of the good and your own choice of life projects

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might purely biological ones. But it does necessitate overcoming the general objectification of women. This aspect is present in many clichés of the ‘feminine’ and needs to be questioned, because if women are perceived and conceive of themselves as being merely objects or instruments to others’ needs, purposes and ends, they will never engage in struggles for their own freedom or the liberty of other individuals. To fight for your own freedom, you first need to imagine yourself in the position of a free and autonomous subject able to decide their own fate. Nonetheless, counteracting such gender clichés does not mean getting rid of the idea that women want to remain feminine or continue to correspond to some form of female ideal. It just means that they have to start thinking outside the boxes and categories imposed on them through socialization. And this task should be followed by men as well, at least by those who feel constrained by the equally restrictive dominant definition of the ‘masculine’.

In practical terms, this quest for freedom could lead to the implementation of specific measures in the educational system, but in a more open and flexible way than that currently promoted in the field: questioning the link between stereotypes and the lack of freedom or justification of inferiorities and disadvantages is one thing, promoting role reversals or a ‘gender free’ society is another. In that respect, perfectionist biases should be avoided: it is not up to public authorities to impose a specific vision of the good on individuals, whether through school curricula or other means. This objective does require forceful and constraining measures but not regarding representations: further measures – such as quotas, for instance, but not just them – should be implemented for women to reach the same positions as men in social, economic and political fields. This would suppose legislative and financial measures above and beyond what is being done at the moment, whether in the Member States directly or at the EU level.

But for this policy work to be pushed further, there will need to be mobilization on the part of

women themselves. This can only happen through convincing alternative projects and discourses. Nevertheless, it is important to recall that ideas and representations do not float in a void. They matter only to the extent that they are closely connected to interests and take structures into account. In this case, new ideas will create results only if they take material factors into account and if they match the interests of the persons concerned – namely, a majority of women. Thus, the material and structural constraints in which most women find themselves will make them more or less responsive to the alternatives proposed. The social contexts that impel women to live different lives from men and to experience specific forms of injustices inevitably lead them to behave and to see things differently. As already discussed, this might even have an impact on their biology. Besides, structural constraints also entail biological differences which are impossible to refute and very much affect women’s lives: their likelihood of getting pregnant and delivering children or their general physical vulnerability, for instance. Those differences should inform not only the content of measures directed at emancipating women but also the discourses carrying those measures.

Finally, women will only be mobilised to support practical measures improving their existence if they are accompanied by a discourse reflecting their perceived interest. This means that an alternative project has to speak to the selfish drives of women as much as to their ideals, principles or selfless orientations. One should therefore contest the very fashionable cliché of a supposedly greater and more innate female empathy. Most research on that topic has in fact shown that, if selflessness is natural and probably an evolutionary necessity, it tends to deploy itself in close, interpersonal circles, while selfish reflexes are likely to prevail in thinking or acting at a more general level such as the socio-political one.³³ Put differently: like other human beings, women should remember that they are also driven by selfish motives, particularly when it comes to supporting collective actions and policies.

ENDNOTES

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² See, for instance, the data provided by the Strategy for equality between women and men 2010–2015, European Commission Strategy adopted in September 2010, http://ec.europa.eu/justice/gender-equality/files/strategy_equality_women_men_en.pdf, p 12.

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⁴ Commission, ‘What is the EU doing for women’s rights and gender equality?’, op. cit., 2015.

⁵ European Commission, ‘Joint Statement on the International Day for the Elimination of Violence against Women’, 25 November 2015, published 24 Nov 2015, http://europa.eu/rapid/press-release-STATEMENT-15-6149_en.htm

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⁸ The Gender Equality Index looks at the following domains: work, money, knowledge, time, power, health, violence against women and intersecting inequalities. It is based on EU policy priorities and evaluates the effect of gender equality policies in the EU and by Member States over time: ‘EIGE launches Gender Equality Index 2015: Marginal improvements in gender equality’, <http://eige.europa.eu/news-and-events/news/eige-launches-gender-equality-index-2015-marginal-improvements-gender-equality>

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¹² Ibid, p 31.

¹³ ‘Motion for a European Parliament Resolution on the EU Strategy for equality between women and men post-2015’, <http://www.europarl.europa.eu/sides/getDoc.do?type=R EPORT&reference=A8-2015-0163&language=GA>

¹⁴ Idem.

¹⁵ European Parliament, ‘Empowering girls through education in the EU’, 9 September 2015, (2014/2250(INI), Resolution, p 3.

¹⁶ Idem.

¹⁷ European Commission, op. cit., 2010, p 29-30.

¹⁸ Ibid, p 8.

¹⁹ Idem.

²⁰ Bettio and Sansonetti, op.cit., p 28-29.

²¹ Ibid, p 29.

²² European Commission, op. cit., 2010, p 16.

²³ ‘Motion for a European Parliament Resolution . . .’, op. cit., 2015.

²⁴ Idem.

²⁵ Bettio and Sansonetti, op. cit., p 31.

²⁶ EP, ‘Empowering...’, 2015, op. cit., p 11.

²⁷ Ibid, p 4-6.

²⁸ Ibid, p 8-10.

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³⁶ For a more detailed argument see the first chapter of S.
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