

# Gender Neutral Drafting and the MOMA Bill

## The debate on the exclusion of “woman” from the MOMA Bill

1. The Ministerial and other Maternity Allowances (MOMA) Bill is currently going through parliament. While the word “women” was used 300 times in the House of Commons reading, it does not appear once in the Bill itself (nor do “she” or “her”); instead gender-neutral terms such as “person” are substituted.<sup>1</sup>
2. Although this is a relatively minor piece of law, its erasure of the word “woman” is part of a wider political and cultural movement that delegitimises clarity about sex. Parts of the media, charities, NHS bodies and government departments are already avoiding the word woman when referring to female biology, and instead talking about “menstruators”, “individuals with a cervix”, “pregnant people”, “birthing bodies”, “chest feeders”, “uterus holders”, “people with vaginas”, “vulva people”, “menopausal people” and “surrogate hosts”.<sup>2</sup> These terms are used on the basis they are “inclusive”; in fact, they are offensive and dehumanising to women.
3. On Thursday 11 February 2021 amendments to the MOMA Bill were tabled by Sir John Hayes MP and Jackie Doyle-Price MP to rectify this. Tonia Antoniazzi MP said:

It does seem a bit of a mis-step in the drafting of the Bill and can be seen as insensitive to many people. The fact that it refers to a “person” who is pregnant and does not mention “woman”, “women” or “she” at any point is totally at odds with all other maternity rights and protection legislation. The use of “person” would be asymmetric with the rest of the law on maternity rights and protection.<sup>3</sup>

She pointed out that the Employment Rights Act 1996 refers to maternity leave using “she”, and the Equality Act 2010 defines maternity discrimination as relating to women:

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<sup>1</sup> Maya Forstater (2021) Pregnant people in Parliament

<https://mforstater.medium.com/pregnant-people-in-parliament-62adaa521c2d>

<sup>2</sup> Bea Jaspert (2021) Lets Form an Alliance <https://beajaspert.substack.com/p/lets-form-an-alliance?>

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<https://hansard.parliament.uk/commons/2021-02-11/debates/7A3F7A8E-E2A0-4B1C-AB3D-67F8DFA798F7/MinisterialAndOtherMaternityAllowancesBill>

I therefore ask the Minister to reconfirm that the wording of the Bill will not be rushed in through the backdoor at this very difficult time, without scrutiny, discussion or challenge.

4. Joanna Cherry QC MP also raised the issue:

I want to focus my concerns on one aspect of this Bill that has been mentioned already: why does this Bill make no mention of women? It is women who give birth and women who benefit from maternity leave. Is this a reflection of the ideological language that is now seen across schools, universities and the NHS, which bans use of the word “woman” and use of the word “lesbian”? Why must we deny the fact that there are two sexes, and why must we deny that biological sex exists? Why are the Government not complying with the Equality Act 2010? That legislation refers to pregnancy and maternity, and uses the day-to-day language of centuries: woman, she and her.

If this is an innocent mistake, then let us put it right quickly and easily by replacing the word “person” with “woman”. But if it is not, let us talk just for a moment about the erasure of women. Most women do not even know that this erasure of their sex class is going on, and when they find out they are appalled and they cannot believe it. Those of us who try to warn of the consequences of the erasure of biological reality and the reality of womanhood from legislation are often pilloried. Many politicians are now so in thrall to those who wish to erase women for the purposes of advancing gender identity theory that they call those of us who advocate for women’s sex-based rights transphobic, even when we have never done or said anything against equal rights for trans people in our lives, and even when some of us were trans allies before it was fashionable to be such.

5. In response, Penny Mordaunt, Paymaster General speaking for the government, said it was impossible to use the word “woman” because of the longstanding policy of gender-neutral drafting:

The hon. Member for Gower listed some Acts that she says have used the word “woman”. They predate the convention that we are now operating under, which was introduced by Jack Straw in 2007. The intention of the guidance on using gender-neutral language was to avoid demeaning women by implying that only men could undertake certain roles, and that drafting convention has remained. It is not the case that we could legally and correctly use the word “woman” in this piece of legislation...<sup>4</sup>

**This briefing considers the argument that it is not legal and correct to use the word “woman” in this legislation, and finds that it does not stand up.**

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<https://hansard.parliament.uk/Commons/2021-02-11/debates/138E027F-1190-4F80-8A06-9F5352A873CF/MinisterialAndOtherMaternalAllowancesBill#contribution-93828742-DACA-4444-BEC7-C5CA75CA3755>

## Sex in UK law: a person of the female sex is a “woman”

6. In UK law, and in general usage, “sex” is understood as binary, with a person’s sex – male or female – being a biological reality: observed at birth (if not before) and recorded when their birth was registered.
7. The biological basis for this was clarified in the case of Corbett v Corbett [1970] 2 WLR 1306 as relating to a person’s chromosomes and endogenous sex organs (internal and external), which are generally congruent. This was reconfirmed by R v Tan [1983] QB 1053 and Bellinger v Bellinger [2003] 2 AC 467). The issue originally arose in the context of marriage, but came to be assumed also to hold for all legal provisions distinguishing between men and women (A v Chief Constable of West Yorkshire Police [2005] 1 AC 51, para 30 per Lady Hale).<sup>5</sup>
8. Section 11(a) of the Equality Act 2010 defines the protected characteristic of sex as:

...a reference to a man or to a woman;

And s.212(1) provides:

In this Act—

...“man” means a male of any age;

...“woman” means a female of any age.

This means the Equality Act defines “sex” in terms of biology, not identity or legal sex where this differs from biological sex.

9. Section 4A of the Human Fertilisation and Embryology Act 1990 (a section inserted by s.4 Human Fertilisation and Embryology Act 2008) makes clear the linkage between “female” and the female germ line (eggs), and between males and the male germ line (sperm):

(10) In this section—

(a) references to eggs are to live eggs, including cells of the female germ line at any stage of maturity...

(b) references to sperm are to live sperm, including cells of the male germ line at any stage of maturity.

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<sup>5</sup> Julius Komorowski, 2020, Sex and the Equality Act, Scottish Law Journal  
<https://www.lawscot.org.uk/members/journal/issues/vol-65-issue-01/sex-and-the-equality-act/>

10. The linkage between “female”, “woman” and “mother” in law is not an approximation, or purely a convention or a matter of respect. It is a crucial protection for the rights of women and their children. At the moment of birth, a child has a mother and the mother has responsibility for her child. The legal position is succinctly summarised by Helen Mountfield QC (sitting as a deputy High Court judge) in R (K) v Secretary of State for the Home Department [2018] EWHC 1834 (Admin) at para. 51:

“... under the 2008 [Human Embryo Fertilization] Act, at birth a child always has one mother, **who is the woman who bore her**; may have a female or male co-parent; may never have more than one male parent; and may not have more than two parents by birth.” [emphasis added]

11. The Equality and Human Rights Commission notes that “gender” is often used as a euphemism for a person’s sex, including in legislation, regulations and guidance. However in practice “man” and “male”, and “woman” and “female”, relate to sex, even where they are referred to as “gender”:

‘Gender’ refers to socially constructed roles of women and men and/or an individual’s conception of their identity. The term is often used interchangeably with ‘sex’, partly in recognition that much of the inequality between women and men is driven by underlying social and power structures rather than by biological sex. Although the Equality Act protects people from discrimination because of their sex, other UK legislation (such as the regulations requiring employers to publish their gender pay gap) refers to gender. This may cause confusion in some circumstances. To avoid any ambiguity, we are reviewing our use of language across our website and publications to ensure clarity and consistency. However, it is important to note that any mistaken or structural use of the term gender does not affect how the law works in practice.<sup>6</sup>

12. Under the Gender Recognition Act (“GRA”) 2004, a person can obtain a Gender Recognition Certificate (“GRC”) and a replacement birth certificate if they have a diagnosis of gender dysphoria, have lived in their new identity for two years and declare that they intend to live in this new identity permanently. No specific surgery or other body modification is required. Thus the administrative sex of around 5,000 people does not align with their biological sex. How this interacts with sex as defined in specific laws is a complex question.<sup>7</sup>

### **The aim of “gender-neutral” drafting is to avoid using male language in situations that apply to both sexes equally**

13. UK law operates under a legislative fiction that “male includes female”, which was established in 1850, when Parliament passed an Act “for shortening the Language used

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<sup>6</sup> EHRC, 2018, Our statement on sex and gender reassignment: legal protections and language <https://www.equalityhumanrights.com/en/our-work/news/our-statement-sex-and-gender-reassignment-legal-protections-and-language>

<sup>7</sup> See for example Julius Komorowski, 2020, Sex and the Equality Act <https://www.lawscot.org.uk/members/journal/issues/vol-65-issue-01/sex-and-the-equality-act/>

in Acts of Parliament” and again repeated in the Interpretation Act 1978, which is still in force. Equivalent wording appears in many private law agreements. That is, the words “man”, “he” and “him” can be taken to include women as well as men (and vice versa), unless the intention is clearly otherwise.

14. Although this is expedient for clarity in lawmaking, it reinforces the sexist notion that men are the default human beings, and that the professional roles being referred to are undertaken by men. Thus, as the Minister stated, since 2007 it has been government policy to use “gender neutral” language in legislation. This policy was announced in a written ministerial statement by Jack Straw as Leader of the House of Commons on 8 March 2007:

For many years the drafting of primary legislation has relied on section 6 of the Interpretation Act 1978, under which words referring to the masculine gender include the feminine. In practice this means that male pronouns are used on their own in contexts where a reference to women and men is intended, and also that words such as chairman are used for offices capable of being held by either gender. Many believe that this practice tends to reinforce historic gender stereotypes and presents an obstacle to clearer understanding for those unfamiliar with the convention.

I have worked with colleagues in Government to secure agreement that it would be right, where practicable, to avoid this practice in future and, accordingly, Parliamentary Counsel has been asked to adopt gender-neutral drafting.

From the beginning of next Session, Government Bills will take a form which achieves gender-neutral drafting so far as it is practicable, at no more than a reasonable cost to brevity or intelligibility.<sup>8</sup>

15. This principle has been incorporated into drafting guidance produced by the Office of the Parliamentary Counsel since 2010, and revised from time to time. The guidance is announced but not debated by Parliament.<sup>9</sup> The use of “woman” in this case is in line with the guidance as we outline below, but even if it wasn’t, this is simply guidance. It has no legal effect. Parliament can make or unmake any law it wishes.
16. The principle of gender-neutral drafting as set out in the guidance does not require the erasure of sex.<sup>10</sup> On this matter the guidance says:

What does gender-neutral drafting require?

2.1.3 In practice, gender-neutral drafting means two things— •

- avoiding gender-specific pronouns (such as “he”) **for a person who is**

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<sup>8</sup> <https://publications.parliament.uk/pa/cm200607/cmhansrd/cm070308/wmstext/70308m0003.htm>

<sup>9</sup> <https://hansard.parliament.uk/Commons/2014>

-03-20/debates/14032056000014/GovernmentBillsDraftingGuidance

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/892409/OPC\\_drafting\\_guidance\\_June\\_2020-1.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/892409/OPC_drafting_guidance_June_2020-1.pdf)

**not necessarily of that gender;**

- Avoiding nouns that might appear to assume that a person of a particular gender **will do a particular job or perform a particular role** (eg “chairman”). [Emphasis added]

17. Nothing in the guidance says not to use sex-based nouns or pronouns where they are appropriate to a role involving only one sex. Giving birth is not like chairing a meeting. It cannot be done by a person of either sex.

18. Indeed, the guidance also stipulates that legislation should seek to use clear and commonly-understood vocabulary “reflecting ordinary general usage”. In section 1.3 Vocabulary, it says:

Which words to choose?

1.3.1 Write in modern, standard English using vocabulary which reflects ordinary general usage. So avoid archaisms and other words or phrases which can give rise to difficulty. Equally, it is not our role to be in the vanguard of linguistic development.

1.3.2 Sir Ernest Gowers proposed three principles as to “how best to convey our meaning without ambiguity and without giving unnecessary trouble to our readers”.

- use no more words than are necessary;
- **use the most familiar words;**
- **use precise and concrete words** rather than vague and abstract words [Emphasis added]

19. The words “woman”, “women”, “she” and “her” represent both ordinary general usage when referring to the group of people who get pregnant and give birth, and are the most precise and concrete terms to refer to this group. Using these terms in legislation on maternity leave, or referring to pregnancy and birth, is therefore in keeping with this guidance.

20. Internationally it is recognised that although gender-neutral language can be positive, sex-based laws are also needed. The CEDAW Convention on the Elimination of All Forms of Discrimination Against Women makes this clear. Human rights organisations internationally often criticize the absence of gender-specific language in national laws and international agreements, as a Danish human-rights coalition notes:

Evidence shows that by neutralising the language the actual issue is also being neutralised. It is therefore important that the language applied in the legal framework is specific and clearly demonstrates the intent of the law.<sup>11</sup>

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[https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%2520Documents/DNK/INT\\_CEDAW\\_ICO\\_DNK\\_37345\\_E.docx](https://tbinternet.ohchr.org/Treaties/CEDAW/Shared%2520Documents/DNK/INT_CEDAW_ICO_DNK_37345_E.docx)

21. The international NGO Plan International argues that clear language about the sexes is essential for protecting women and girls rights:

Use of gender-specific language rather than gender-neutral language must be standardized in international agreements and national policies.<sup>12</sup>

**Legislation enacted after 2007 has continued to use sexed language where appropriate**

22. The Minister states that “women” is used only in legislation that predates the gender-neutral drafting policy of 2007. This is simply false.
23. As Tonia Antoniazzi highlighted, the Equality Act 2010 (post 2007) uses “woman”, not just in terms of defining the protected characteristic of sex, but also throughout the Act in all sections related to pregnancy, maternity or lactation. For example, see section 18, which deals with pregnancy and maternity discrimination at work:

(2) A person (A) discriminates against a woman if, in the protected period in relation to a pregnancy of hers, A treats her unfavourably —

- (a) because of the pregnancy, or
- (b) because of illness suffered by her as a result of it.

(3) A person (A) discriminates against a woman if A treats her unfavourably because she is on compulsory maternity leave.

(4) A person (A) discriminates against a woman if A treats her unfavourably because she is exercising or seeking to exercise, or has exercised or sought to exercise, the right to ordinary or additional maternity leave.

(5) For the purposes of subsection (2), if the treatment of a woman is in implementation of a decision taken in the protected period, the treatment is to be regarded as occurring in that period (even if the implementation is not until after the end of that period).

24. In the Equality Act there is no provision for indirect discrimination based on pregnancy and maternity, rather this can be pursued as indirect sex discrimination. The use of sexed language in the legislation and guidance supports this understanding.
25. The Immigration Act 2016 Section 60 (Limitation on detention of pregnant women) refers to pregnant women:

- (1) This section applies to a woman if the Secretary of State is satisfied that the woman is pregnant.
- (2) A woman to whom this section applies may not be detained under a relevant detention power unless the Secretary of State is satisfied that—
  - (a) the woman will shortly be removed from the United Kingdom, or
  - (b) there are exceptional circumstances which justify the detention.

26. Another recent piece of legislation that uses sex-based language in relation to maternity is the Civil Partnerships (Opposite Sex Couples) (2019) Regulations. S.12 (2). This

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<sup>12</sup> <https://plan-international.org/un/girls-rights>

states:

### **Legitimacy of children of civil partners**

(2) The presumption of common law that a child born to a woman during her marriage to a man is also the natural child of her spouse applies equally in relation to a child born to a woman during her civil partnership with a man.

27. There was an adjournment debate on gender-neutral drafting in the Lords on 12 December 2013, initiated by Lord Scott of Foscote. Lord Gardiner of Kimble confirmed that “gender neutrality” does not apply to laws concerning maternity;

The guidance also recognises that there must be some flexibility and that there will be some Acts where only gender-specific drafting can be usefully applied. In a case where a person has to be of a particular gender - male or female - gender-neutral drafting does not require drafters to avoid referring to the gender. **I think your Lordships would agree that that would be the case for legislation about maternity.** [Emphasis added]

28. **It is simply not the case that it is not “legal and correct to use the word ‘woman’”, and female pronouns here, because Parliament’s hands are tied by guidance. Parliament can make or unmake any law it wishes, and is not bound by drafting guidance. But in any case “Woman” is entirely correct, in line with existing law and with the drafting guidance. Using the word would avoid contributing to the dehumanising specification of women as menstruators, uterus havers, birthing people and so on.**

### **Gender Ideology uses language games to undermine women and children’s rights and consent**

29. The idea that the gender-neutral drafting norm outlaws the use of “woman” in laws related to maternity does not stand up to scrutiny - as s.18 Equality Act 2010 clearly demonstrates. Rather, it appears likely that this phrasing was influenced (either explicitly or implicitly) by gender-identity ideology: the idea that a person’s sex is not important, only their gender identity.
30. Supporters of this ideology vilify as “transphobic” those (such as JK Rowling and gender-critical feminists) who defend the definition of “woman” as “adult human female” (or more broadly, “female of any age”, as in the Equality Act). They seek to replace sex-discrimination protections with protections based on “gender identity”.
31. The Government Legal Department and the Office of the Parliamentary Counsel in 2019 teamed up with two organisations that are exponents of this ideology: Global Butterflies and Interlaw Diversity Forum. They published a co-branded Guide to Gender Neutral Drafting, which is promoted as “based on guidance produced by the Office of Parliamentary Counsel in drafting legislation”. However, the guide changes the stated aim of gender-neutral drafting away from that set by the government (equality between



men and women) to promoting “a spectrum of gender identities”. In this version, which seeks to “influence the norm across the legal profession”, the clarification that gender-neutral language does not need to be used when the law relates only one sex was removed.<sup>13</sup> There is no sign that any other organisations or the public were consulted.

32. There are other examples of government departments and public bodies adopting inappropriate gender neutral language for women and girls. For example, the NHS page on “Trying to Get Pregnant” does not differentiate between the roles of men and women in conception and pregnancy. It states :

If you are under 40 and have regular sex without using contraception, there is an 8 in 10 chance you will get pregnant within 1 year.<sup>14</sup>

This use of gender-neutral language produces a nonsensical result.

33. The guidance for the Period Product Scheme for Schools and Colleges in England says it is for “girls, non-binary and transgender learners who have periods”. The official documentation uses gender-neutral language, for example:

Period products, such as pads and tampons, should be available for **all who need them**, when they need them, in order to access education.

34. It is concerning that the government is using “free” products to promote the adoption of language that erases sex, and which induces young people not to be able to understand or talk about biological reality. This use of language that encourages girls to think that they may not be girls if they don’t fit into gender stereotypes, or if they feel unhappy about their body, is not neutral. There has been a 4,400 percent increase in girls referred for transitioning treatment in the past decade. In 2018 Penny Mordaunt, as Minister for Women, promised a review looking into potential causes, including the role of social media and the teaching of transgender issues in schools.<sup>15</sup> This has not yet been published. Meanwhile the case of Bell v The Tavistock [2020] EWHC 3274 (Admin) found that children under the age of 18, and as young as 10, were inappropriately put on experimental puberty-blocking drugs, to which they could not give informed consent at such a young age.
35. In particular, the court was concerned that this treatment, if pursued over the long term, results in loss of sexual function and in sterilisation. A treatment that means giving up the potential to become a mother or father is not something that girls and boys are able to comprehend or consent to.
36. It is an explicit aim of “gender-neutral drafting” to use language to change the way that people think. This is justified where the aim is to encourage people not to intuitively think

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<sup>13</sup> <https://www.interlawdiversityforum.org/guide-to-gender-neutral-drafting>

<sup>14</sup> <https://www.nhs.uk/pregnancy/trying-for-a-baby/trying-to-get-pregnant/>

<sup>15</sup> <https://www.telegraph.co.uk/politics/2018/09/16/minister-orders-inquiry-4000-per-cent-rise-children-wanting/>

of a man when reading the words judge, minister, CEO, doctor, scientist and so on. However, there is no justification for disrupting intuitive and legal associations of words with sexes, such as the word “man” with male, “penis” and “rapist” with man, and the words “mother” and “lesbian” with “woman”. Doing so makes it more difficult to think about the risks of treating male people as if they are female, and about the rights that are eroded when women are forced to do so. As feminist writer Barra Kerr wrote:

Incongruent pronouns also make your brain work much harder; not just when you are using them, but when you are receiving them as information. You are working constantly to keep that story straight in your head. Male or female? Which one, again? Concentrate harder. Ignore your instincts, ignore your reaction.<sup>16</sup>

### **Does saying “women” in law exclude transgender people who are female?**

37. It is sometimes argued (although not yet in Parliament) that the word “woman” can no longer be used to refer to female people as this would exclude “trans men” (women who identify as or have legally changed their sex to male).
38. Under the Gender Recognition Act 2004, a person over 18 is able to apply to change their legally recorded sex if they have or had a diagnosis of gender dysphoria, and have changed their name and title on documentation for a period of two years. No surgical treatment is required. Thus a person who is biologically female with a fully functioning female reproductive system and sexual anatomy may become a man for legal purposes. It is therefore true that (very occasionally) an individual who is legally a man can be pregnant and give birth.
39. However, it is clear that the Gender Recognition Act was never intended to ban ordinary sex-based language and laws. Such an outcome would have required a level of societal discussion that did not take place. Rather, the law grants a legal fiction of changing sex to a small number of people, and allows this legal fiction to be disregarded in favour of biological sex by **any other** enactment (Section 9(3)).
40. Section 12 specifically provides:

#### **Parenthood**

The fact that a person’s gender has become the acquired gender under this Act does not affect the status of the person as the father or mother of a child.

Although the drafters of GRA perhaps only anticipated that someone would change their legal sex *after* having children, it is hard to see why any enactment that relates to maternity would relate differently to someone because of their possession of a gender recognition certificate obtained at any time during the process of conception, pregnancy, birth or motherhood.

41. The link between being biologically female (i.e. a woman in common law) and being the

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<sup>16</sup> <https://fairplayforwomen.com/pronouns/>

mother of a child was further confirmed in the recent case of R (McConnell & YY) v The Registrar General for England and Wales [2020] EWCA Civ 559. Freddy McConnell, a female person who is legally male, sought to be registered as the father of the child YY, rather than as the mother. The Court of Appeal ruled that:

The legislative scheme of the GRA required Mr McConnell to be registered as the mother of YY, rather than the father, parent or gestational parent.

42. Furthermore, the Interpretation Act 1978 remains the underlying expression of parliament's will in terms of parliamentary drafting. Section 6 of the 1978 Act provides, *inter alia*, that:

In any Act, unless the contrary intention appears ... words importing the masculine gender include the feminine ... words importing the feminine gender include the masculine ... words in the singular include the plural and words in the plural include the singular.

Thus the *general* deeming provision that the word man or woman in law can be used inclusively to cover members of the opposite sex ensures that the *individual* legal fiction that a person has changed sex would not mean they are excluded from provisions that relate to their biological sex.

In other words; the word "woman" meaning female person in any legislation would also be sufficient to cover the < 0.01% percent of legal men who are in fact female people.

## Recommendations

The responsibility for making laws rests with parliament. The argument by the government that it could not “legally and correctly use the word “woman” in this piece of legislation” is incoherent. Parliament can make and unmake any laws it chooses. Guidance is not binding on legislators.

Furthermore the use of “woman” in this case follows **both** existing law and the guidance on gender neutral drafting.

1. **The Bill should therefore be amended in the Lords.**
2. **If “persons” remains in the Act it should not be taken as a precedent.** The MOMA Bill is being rushed through because of the Solicitor General Suella Braverman’s imminent maternity leave. If as a result of this circumstance no amendment is agreed and the word “person” instead of “woman” remains, this should be seen as the result of a slip up in drafting (and misunderstanding of gender neutral drafting norms) and not taken as a precedent or guide to eliminate the use of the words “woman” and “man” across primary or secondary legislation, guidance and policies, in situations where sex matters.
3. **Rather, this incident points to the need for stronger clarification in the official Drafting Guidance** and any associated communications produced by the Government Legal Department or the Parliamentary Counsel on the use of sex-specific language where it is appropriate. Official drafting guidance should make clear that “sex” should be used in legislation for clarity (rather than the undefined “gender”), and that sex-based words and pronouns must be used where appropriate.

Regardless of whether this Bill is amended in the Lords, Parliamentary Counsel need to revise their guidance and a Select Committee examination of the use of gender/sex language in official documents is also needed.

4. **In particular, the guidance produced by the GLD and OPC with help from Global Butterflies and Interlaw Diversity Forum should be withdrawn**, and questions asked about how government policy came to be misrepresented in an ostensibly official publication.

Sex Matters

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