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Feminist Aims and a Trans-Inclusive Definition of "Woman"[1]

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Abstract

In "Amelioration and Inclusion: Gender Identity and the Concept of Woman," Katharine Jenkins argues that Sally Haslanger's focal analysis of gender problematically excludes nonpassing trans women from the category "woman." However, Jenkins does not explain why this exclusion contradicts the feminist aims of Haslanger's account. In this paper, I advance two arguments that suggest that a trans-inclusive account of "woman" is crucial to the aims of feminism. I claim that the aims of feminism are to understand and combat women's oppression. First, I argue that denial of trans identities reinforces cultural ideas that perpetuate both transphobic violence and sexual violence against women. Consequently, a feminist account of "woman" that fails to respect trans identities indirectly contributes to the oppression of women. Second, I prove that nonpassing trans women are oppressed as women through the internalization of sexual objectification. I then conclude that an account of "woman" that excludes nonpassing trans women cannot successfully advance a complete understanding of women's oppression.

Keywords: feminism, transfeminism, oppression

I. Introduction

In "Gender and Race: (What) Are They? (What) Do We Want Them to Be?" Sally Haslanger conducts a focal analysis of gender that is guided by the aims of critical feminist discourse. Haslanger defines being a "woman" as being a member of a social class whose unifying feature is social subordination based on one's presumed or perceived female biological role in reproduction. Because feminist discourse aims to develop an understanding of the oppression of women, Haslanger

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does not think it problematic that her account excludes females who are not socially subordinated.

However, in "Amelioration and Inclusion: Gender Identity and the Concept of *Woman*," Katharine Jenkins argues that Haslanger's focal analysis of gender problematically excludes nonpassing trans women from the category "woman."[2] Jenkins asserts that this exclusion of some trans women from her account of "woman" is incompatible with the feminist aims guiding Haslanger's analytical inquiry. Jenkins claims that such exclusion marginalizes trans women within feminist discourse, but she does not offer a satisfying account of why such marginalization is problematic given the stated feminist aims of Haslanger's account. In other words, Jenkins does not satisfyingly rule out the possibility that Haslanger's exclusion of some trans women is defensible on the grounds that such trans women are not socially subordinated on the basis of their presumed biological role in reproduction.

I will argue that creating a trans-inclusive definition of woman is crucial to feminist aims. I start from the claim that the aims of feminism are to understand and combat women's oppression. I then advance two arguments for the inclusion of trans women (both passing and nonpassing) in a feminist account of "woman." First, I argue that the political aim of feminism—the commitment to combatting the oppression of women—requires that a feminist account of "woman" be trans-inclusive. I argue that feminism's commitment to eradicating women's oppression is embedded within a broader commitment to bring about a more just society. Using a definition of "woman" that marginalizes trans women is counterproductive to this aim of feminism. In addition, I argue that denial of trans identities reinforces cultural assumptions about the communicative nature of gender presentation. Insofar as these cultural assumptions motivate and are used to justify transphobic violence and sexual violence against women, an account of "woman" that fails to respect trans identities may perpetuate these oppressive forms of violence.

Second, focusing specifically on the sexual objectification of women by cultural stereotypes that result in women's internalization of objectification through adaptive preferences, I argue that female gender identity is sufficient for trans women (passing and nonpassing) to experience the psychological forms of oppression that women face. Therefore, because all trans women can be oppressed *as women,* a feminist account of "woman" that excludes some trans women cannot fully serve the goal of feminist discourse—that is, advancing an understanding of women's oppression.

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[2] Throughout this paper, I use the phrase "nonpassing trans women" to refer to those trans women who do not "pass" as cis women. In contrast, the phrase "passing trans women" refers to trans women who do "pass" as cis women. I will elaborate more on the phenomenon of passing in section II.

II. Background: Summary of Haslanger and Jenkins

Haslanger conducts a focal analysis of gender in order to create a definition that serves the aims of critical feminist theory and avoids the commonality and normativity problems that often obstruct attempts to define "woman."[3] The commonality problem refers to the worry that there is no social feature or experience that all women share. The normativity problem involves the recognition that any definition of woman has normative implications and may privilege some women and marginalize others or further entrench patriarchal values of femininity (Haslanger 2012, 228).

In order to generate a definition of "woman" that is guided by the interests of feminist analysis and avoids the commonality and normativity problems, Haslanger creates an account of "woman" in which being a woman involves being a member of a social class in which one is systematically subordinated on the basis of (presumed) biological sex:

> S *is a woman* iff
> (i) S is regularly and for the most part observed or imagined to have certain bodily features presumed to be evidence of a female's biological role in reproduction;
> (ii) that S has these features marks S within the dominant ideology of S's society as someone who ought to occupy certain kinds of social position that are in fact subordinate (and so motivates and justifies S's occupying such a position); and
> (iii) the fact that S satisfies (i) and (ii) plays a role in S's systematic subordination, that is, *along some dimension,* S's social position is oppressive, and S's satisfying (i) and (ii) plays a role in that dimension of subordination. (2012, 234; emphasis in the original)

Haslanger claims that her focal account of woman avoids the commonality and normativity problems because it is an analytical account that focuses on subordinate social positions as the feature that women share (240). Further, while Haslanger admits that some nonoppressed females may not count as women on her account, she claims that this is not problematic insofar as the account is intended to facilitate

[3] According to Haslanger, a focal analysis "explain[s] a variety of connected phenomena in terms of their relations to one that is theorized as the central or core phenomenon" (2012, 228). Haslanger takes gender's function as a social class as the "core phenomenon" to be explained. All other aspects of gender—"norms, symbols, and identities"—are to be understood through the lens of gender as a social class (228).

critical feminist analysis: "The important issue is not whether a particular account 'marginalizes' some individuals, but whether its doing so is in conflict with the feminist values that motivate the inquiry" (240).[4]

Before presenting Jenkins's account of why this marginalization is problematic, a few comments about "passing" might be helpful. A trans woman "passes" when she is perceived to be a woman by those around her. Specifically, the term "passing" applies to contexts in which others observe or imagine a trans woman to have "bodily features presumed to be evidence of a female's biological role in reproduction" (Haslanger 2012, 234–235). Following the spirit of Haslanger's definition, I will call "passing" those trans women who are perceived to be women "regularly and for the most part" and "nonpassing" those trans women who are *not* perceived to be women "regularly and for the most part."

Jenkins argues that Haslanger's account of "woman" problematically excludes some trans women from the category of woman. Specifically, Haslanger's account excludes trans women who are nonpassing. Jenkins details four scenarios in which a trans woman may find herself: (1) a trans woman who does not publicly present as a woman and is perceived and treated as a man by those around her; (2) a trans woman who presents as a woman but who is perceived and treated as a man (or, further, a man pretending to be a woman); (3) a trans woman who presents as a woman and is treated as a woman because she is thought to be biologically female (i.e. she is "passing"); (4) a trans woman who presents as a woman and is treated as a woman, not because she is perceived to be biologically female but rather because those around her unconditionally respect individuals' gender presentation (Jenkins 2016, 399–401). On Haslanger's account, only trans women in scenario 3 would count as women. The trans woman who finds herself in Jenkins's scenarios 1 and 2 is not passing *at that time* and consequently is not functioning as a woman.

Jenkins explicitly states, but does not explain or defend, that the exclusion of some trans women from Haslanger's account is problematic, given the feminist aims of her inquiry:

> Failure to respect the gender identifications of trans people is a serious harm and is conceptually linked to forms of transphobic oppression and even violence. It follows from this that an important desideratum of a feminist

[4] When Haslanger claims that some nonoppressed females may not be counted as women, she means women who are privileged socially, politically, and economically such that they cannot be considered members of a subordinated social class. Later, in the *PEA Soup* blog discussion of Jenkins's paper, Haslanger acknowledges that her account fails to capture all the individuals that feminism ought to be concerned about (i.e. trans women). See "Ethics Discussion at PEA Soup" (2017).

> analysis of gender concepts is that it respect these identifications by including trans people within the gender categories with which they identify and not including them within any categories with which they do not identify.[5] (Jenkins 2016, 396)

After demonstrating this alleged flaw in Haslanger's account, Jenkins tries to repair the account by adding gender identity as a twin target concept with Haslanger's gender as social class (406–413).[6] Although I agree with Jenkins's claim, she fails to show why the harms and oppressions that trans people face necessitate that a *feminist* analysis of gender ought to be trans-inclusive.

In light of Haslanger's account, it seems that nonpassing trans women are not socially subordinated as women "regularly and for the most part" because they are not *perceived* to be women "regularly and for the most part." Because the aim of Haslanger's account is to develop a definition of "woman" that allows feminist analysis to treat women as a group because of their shared experience of oppression, it is important that anyone who is counted as a woman under her account is oppressed *as a woman*. Thus, in order for Jenkins's revision of Haslanger's account to be faithful to the original aims of the account, it must be the case that sexist subordination is a systematic and pervasive element of the experience of nonpassing trans women.

In this paper, I follow Haslanger and Jenkins and define the aims of feminism broadly. On my view, the aims of feminism are to understand and combat women's oppression.[7] It is based on this description of feminism's goals that I defend the claim that it is critical for feminist accounts of gender to respect trans identities.

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[5] It should be noted that, while Jenkins's revision of Haslanger's account solves the first problem that is mentioned here (i.e. excluding some trans women from the category "woman") it does not solve the second problem of wrongful inclusion (i.e. including some trans women in the category "man").

[6] Recall that Haslanger's "focal analysis" takes gender's function as a social class to be the "core phenomenon" through which all other aspects of gender ought to be understood. In advocating a "twin target concept," Jenkins hopes to elevate gender as identity to have equal status with gender as social class, such that nonpassing trans women are not classified as women only in a secondary sense.

[7] Haslanger claims that her focal analysis is guided by "the need to *identify and explain persistent inequalities* between females and males," which indicates an emphasis on the importance of understanding and explaining women's oppression (226; emphasis added). Similarly, in "On Being Objective and Being Objectified," Haslanger claims: "If feminism is successful, there will no longer be a gender distinction as such—or, allowing that there are a plurality of relations that serve to

While at times I am critical of Haslanger's account, the purpose of this paper is not to offer a focused critique of Haslanger's account of woman (Jenkins has already written that paper). Rather, in this paper I hope to offer a general account of why feminist accounts of "woman" ought to include *all* trans women. I use Haslanger's account as my example because I agree with Haslanger's contention that feminist accounts of woman ought to be constructed in a way that serves the goals of feminism. Given the aims of Haslanger's project and her explicit statements discussing Jenkins's paper (see footnote 4), I am confident that the exclusion of some trans women from her account is due to its age and the relative invisibility of trans issues at the time that she wrote it. Further, I am confident that Haslanger would agree that feminist accounts of woman ought to include trans women.

III. Feminist Politics: Combatting Women's Oppression

In this section, I argue that a definition of "woman" that excludes (some) trans women is incompatible with the first aim of feminism—that is, combatting women's oppression. In the first subsection, I argue that feminism's commitment to eradicating women's oppression entails an implicit commitment to avoid perpetuating or contributing to the oppression of others. I then argue that failure to respect trans identities is itself unjust and, further, that it perpetuates the oppression of trans individuals. Consequently, a definition of "woman" that fails to respect trans identities is in tension with feminism's implicit commitment to avoid perpetuating oppression.[8]

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constitute gender and a plurality of feminist projects, we can say that one goal of feminism is to fight against the sexual subordination that constitutes these categories of men and women" (62). Jenkins expresses a commitment to feminism's political goal of ending women's oppression in addition to echoing the idea that it is first necessary to understand this oppression. This reasoning is revealed in Jenkins's discussion of how her modification of Haslanger's account improves its explanatory power: "both gender as class and gender as identity are relevant to understanding the oppression of women" (414).

[8] Although I take trans identities to be legitimate in this paper, here I cannot make the argument that, because feminism is committed to protecting women's interests and because trans women are women, feminists must fight the oppression of trans women. First, even if we agree that trans women are women because we hold that trans identities are legitimate, part of the task that I take up in this project is to prove that (nonpassing) trans women are oppressed *as women*. Consequently, I cannot start this argument by assuming that the oppression of trans women is a direct concern for feminists without begging the question. Second, when writing this paper, I had many different audiences in mind, one of which included individuals

In the second subsection, I argue that failing to respect trans identities contributes to the oppression of women. Specifically, I argue that transphobic violence and sexual violence against women are both motivated and justified by cultural assumptions about the communicative relationship between gender presentation and sexual availability. I then argue that failing to respect trans identities reinforces this cultural assumption and, in turn, perpetuates the oppression of women. Consequently, a definition of "woman" that fails to respect trans identities is incompatible with feminism's commitment to eradicating women's oppression.

III.A. A Commitment to Eradicating Societal Injustice

Although feminists have diverse views, all feminists hold that women are oppressed, that oppression is unjust, and that women's oppression must be ended. Given that feminists recognize oppression as unjust and, hence, a serious moral wrong, they ought to avoid perpetuating or contributing to the oppression of others in their attempts to end the oppression of women. This does not mean, however, that feminists ought to be committed to eradicating all forms of oppression simultaneously. Rather, given their broader condemnation of oppression as a serious moral wrong, feminists are implicitly committed to the idea that society would be improved if there were fewer instances of oppression and injustice. That is, let us say that feminists view (or ought to view) a more just society as their end. If they are (implicitly) committed to this claim, then feminists ought not perpetuate injustice or oppression of any kind (whether directly or indirectly). Such perpetuation of oppression and/or injustice would be problematic for the feminist who holds that oppression is a serious moral wrong. More importantly, however, such perpetuation of oppression is in conflict with feminism's implicit commitment to bringing about a more just society.

Failing to respect trans identities involves holding them to be and/or treating them as illegitimate.[9] In what follows, I demonstrate that failure to respect trans

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who may not automatically accept the legitimacy of trans individuals. Because this is one of my potential audiences, I cannot base my argument here on the assumption that trans women are women without leaving myself susceptible to the skepticism of some readers.

[9] On my view all cases of believing trans identities to be illegitimate are cases of failing to respect trans identities, but not all cases of failing to respect trans identities are cases of believing trans identities to be illegitimate. One can fail to respect trans identities without believing them to be illegitimate. Take, for example, the following cases. Joe believes that trans identities are illegitimate and repeatedly

identities perpetuates transphobic oppression both directly and indirectly. Using an account of woman that excludes (some) trans women reinforces the notion that trans identities are illegitimate and therefore fails to respect trans identities. Here I do not want to charge Haslanger herself with failing to respect trans identities; rather, I want to suggest that it is problematic for feminists to use an account of woman that does not include trans women. Given that feminists ought to be committed to avoiding the perpetuation of oppression and injustice, such failure to respect trans identities is in tension with feminists' commitment to the eradication of women's oppression.[10]

According to Talia Bettcher in "Trans Identities and First-Person Authority," denial of trans identities is a violation of ethical first-person authority and is therefore unjust. Bettcher begins by proposing an ethical notion of first-person authority that is meant to extend beyond the epistemic notion. According to Bettcher, we have ethical first-person authority (hereafter, FPA) over our mental attitudes. We can be held responsible for our attitudes in the sense that we "can be faulted for holding inappropriate, false, or irrational attitudes" (Bettcher 2009, 102). In other words, disclosure of our attitudes can have social consequences. Because of this culpability for our mental attitudes, Bettcher claims that the ethical notion of

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mispronouns Alex (a trans person who identities as gender nonbinary). Jim does not believe that trans identities are illegitimate but does not know about Alex's gender identity and so repeatedly mispronouns them. While I do not want to say that Jim is morally blameworthy for failing to properly pronoun Alex, in this paper, I want to maintain that Jim's actions can be understood as failing to respect trans identities. Even though Jim's actions are not motivated by a belief in the illegitimacy of Alex's gender identity, Alex may nonetheless be offended by Jim's repeated use of improper pronouns. Further, those around him may interpret Jim's mispronouning as motivated by a belief in the illegitimacy of Alex's gender identity and may view this as justifying their own beliefs about the illegitimacy of Alex's gender identity. I want to suggest that using an account of "woman" that excludes (some) trans women fails to respect trans identities in a similar way.

[10] It should be noted that the reason that I argue for inclusion of trans women in a feminist account of "woman" is because lack of recognition as women contributes to the oppression of trans women and is therefore in tension with feminist aims. Such a strategy would not apply to, say, black men, whose oppression is not intensified by their exclusion from the category "woman." While feminists' commitment to ending oppression requires that feminists avoid perpetuating the oppression of black men, excluding black men from the category "woman" does not contribute to their oppression. Therefore, there is no imperative to include black men in a feminist account of "woman."

FPA entails that individuals have a right to privacy and ownership of their attitudes.[11] Consequently, disclosure of one's attitudes ought not be coerced, nor should a person "avow somebody else's mental attitudes on their own behalf" (Bettcher 2009, 102).

Bettcher claims "existential self-identity" falls under ethical FPA and that gender is part of one's existential self-identity.[12] Bettcher claims that existential self-identity is not a conception of the self but is instead determined by the set of beliefs, attitudes, and commitments that one has. Because existential self-identity concerns one's beliefs, attitudes, and commitments, it "falls under the reach of FPA" (Bettcher 2009, 110). On Bettcher's account, gender is properly part of one's existential self-identity and therefore ought to be protected by ethical FPA. Bettcher provides three reasons why gender is properly understood as part of one's existential self-identity. First, within trans-friendly communities, one's gender self-identification does not invalidate others', even if they hold different and/or conflicting metaphysical views about gender and sex (Bettcher 2009, 111). If gender was understood as constituting part of one's metaphysical self-identity, some individuals' gender self-identifications would inevitably invalidate others' if they held conflicting metaphysical views about gender and sex. Second, when one self-identifies as a particular gender, one is not making a claim about metaphysical reality but rather about one's beliefs (Bettcher 2009, 111). Bettcher illuminates this point with an example: "For example, if one believes some neurological state makes one a woman and it turns out one lacks this state, it follows one is not a woman. However, it is generally assumed in community interactions that the truth or falsity of a person's self-identifying claim does not stand or fall on such issues" (111). Third, existential self-identity helps us understand individuals' motivations for self-

[11] One might object that we can be responsible for something without having a right to privacy with regard to that thing. For example, one may be responsible for their testimony in court without having a right to privacy with regard to what one witnessed. However, with attitudes and beliefs that are not acted upon and therefore do not directly impact other people, it seems that the right to privacy might still apply. FPA's right to privacy regarding attitudes and beliefs is more akin to the right to privacy regarding which candidate we vote for.

[12] Bettcher explains the concept of existential self-identity by contrasting it with metaphysical self-identity. According to Bettcher, metaphysical self-identity is "a self-conception that answers the question 'What am I?' It involves an overall picture of the world (including categories such as men and women) in which one locates oneself" (110). In contrast, existential self-identity answers the questions "What am I about? What moves me? What do I stand for? What do I care about the most?" (110).

identifying in a certain way, whereas metaphysical self-identity does not (Bettcher 2009, 111).

Because gender is part of an individual's existential self-identity, and existential self-identity falls under ethical FPA, it follows that individuals have FPA over their gender self-identifications. Recall that according to Bettcher, under the ethical notion of FPA, individuals have a right to privacy and ownership of their mental attitudes. This privacy and ownership entails that it is morally impermissible to coerce someone into revealing one's attitudes, and it is also morally impermissible to make avowals about another's attitudes on their behalf. When applied to gender, FPA entails that one cannot be forced to reveal one's gender to others nor can a person assume the authority of determining the truth of another's gender identity. According to Bettcher, failing to respect trans identities is a case of the latter violation of FPA.

According to Bettcher, the "natural attitude" regarding conceptions of sex and gender holds that "there are two naturally mutually exclusive, exhaustive, and invariant sexes, and membership within a sex is determined by genitalia" (2009, 103). Bettcher claims that "normals" (those who hold the natural attitude) do not respect trans self-identifications because they hold that "real" gender is inevitably determined by genitalia. In such cases, "normals" violate trans people's FPA over gender because they take their own metaphysical conception of sex as determinative of the trans person's "authentic" gender. In other words, such a denial of trans identities is a case of one person making definitive and authoritative claims about another person's mental attitudes on their behalf, which is a morally impermissible violation of FPA. But denial of trans identities is more serious than a simple case of a controlling person asserting authority over another's mental attitudes. In contrast, when a trans person's identity is denied, the trans person is not given any opportunity to make a genuine avowal. That is, no matter what the trans person claims regarding his or her gender, the denier has already determined the trans person's "real" gender based on her assessment of the trans person's "natural" genital status. In other words, if a trans woman claims "I am a woman," this is interpreted as a lie or as pretense. When trans identities are denied, it "silences a transperson's avowal of existential self-identity" (Bettcher 2009, 115).

Failure to respect trans identities contributes to trans oppression by motivating sexual violence and physical violence as well as by legitimating victim blaming in cases of transphobic violence. In addition, the risk of violence, when coupled with common assumptions about the illegitimacy of trans identities, creates double binds for trans people. Bettcher (2014, 392, 403) argues that one form of trans oppression is what she terms "reality enforcement," which is motivated by

assumptions about the illegitimacy of trans identities.[13] According to Bettcher, reality enforcement has four essential features. First, identity invalidation occurs when a trans person's gender identity is "erased"—that is, when an individual categorizes a trans woman as a man (for example). Second, according to Bettcher, identity invalidation is asserted in terms of an appearance-reality contrast—for example, the onlooker will say something like "That's really a man disguised as a woman." Third, knowledge of this appearance-reality contrast presents trans people with a double bind. That is, they can either pass as cis and risk being exposed as a deceiver, or they can be openly trans and be treated as a pretender. Finally, reality enforcement involves some form of genital verification either through physical exposure or through comments that assert the "reality" of a trans person's genital status (Bettcher 2014, 392).

Although Bettcher does not explicitly defend her claim that reality enforcement is a form of trans oppression, her discussion of the phenomenon includes the necessary features for reality enforcement to constitute a form of oppression. Here I draw on Bettcher's comments to assert that reality enforcement is oppressive because it involves or threatens to involve sexual violence, physical violence, victim blaming, and double binds.

First, reality enforcement can paradigmatically involve sexual violence. There are two main ways that sexual violence is often involved in reality enforcement. Trans people are often raped as a result of the discovery that they are trans. Bettcher (2007) interprets rape of FTMs[14] "as an obvious strategy for putting 'women back in their rightful place'" (57). Similarly, MTFs are often subject to sexual violence in the form of rape. And, as Bettcher notes, genital verification is one of the essential features of identity enforcement. Genital verification can occur either through forced physical exposure or through statements about the genital status of the victim. When genital verification takes the form of forced physical exposure, this is a form of sexual violence.

Second, reality enforcement often involves physical violence against trans people. Transphobic violence can be motivated by either the deceiver stereotype or the pretender stereotype. For those who are openly trans and are thus interpreted as "an *x* pretending to be a *y*," they may be subjected to violence because they are interpreted as violating gender norms: "If a person is subjected to discrimination or violence because this person is taken to be in violation of gender norms (perhaps

[13] In "Evil Deceivers," Bettcher (2007, 47) refers to the same phenomenon as "identity enforcement."

[14] FTM refers to trans men—those individuals assigned female at birth but who identify or present as men—and MTF refers to trans women—those individuals assigned male at birth but who identify or present as women.

because the person is wearing a dress), this is no doubt because the person is being transphobically viewed as a man" (Bettcher 2014, 396). In contrast, trans people who attempt to pass as cis are often viewed as malicious deceivers upon discovery and are often subjected to brutal violence as a form of retaliation for the deception.

Third, in cases of transphobic violence, the acts of the perpetrator are often justified or minimized by use of victim blaming. Specifically, the trans panic defense has been used in court as a defense against hate crime charges for individuals who murdered trans people (Bettcher 2007, 42–45). The trans panic defense often appeals to the sexual deception that the trans victim engaged in and, according to Bettcher (2007, 52–54), this sexual deception is often equated with rape. Consequently, the violence against and consequent murder of the trans "deceiver" is interpreted as a violent and enraged response to the shock of discovering that the perpetrator has been deceived by the trans victim.

Finally, as I mentioned above, one of the essential features of reality enforcement is the double bind that trans people face. That is, trans people face the deceiver-pretender double bind in which they must choose between having their gender identity taken seriously and minimizing the risk of lethal violence. This double bind is characteristically oppressive insofar as it limits trans people's options to two unsavory choices.[15]

All of these paradigmatic features of reality enforcement are motivated by a belief that trans identities are illegitimate. Consequently, failing to respect trans identities by treating them as illegitimate contributes to trans oppression in the forms of double binds, sexual violence, physical violence, and victim blaming. Thus, failure to respect trans identities is in tension with feminists' implicit commitment to avoid perpetuating oppression.

Insofar as feminism is necessarily embedded within a broader condemnation of oppression and injustice, it runs counter to the aims and commitments of feminists to perpetuate oppression, particularly oppression that is based on gender or gender identity. Failure to respect trans identities often underlies transphobic violence, which is a form of oppression.[16] Thus, it seems that there is, in fact, a strong imperative for a feminist analysis of gender to respect the gender identities of trans people by ensuring that feminist definitions of woman are trans-inclusive.

III.B. Common Sources of Sexism and Transphobia

As I claimed above, one of the aims of feminism is to eradicate the oppression of women. Here, I argue that using an account of "woman" that excludes

[15] See Marilyn Frye's "Oppression" (1983, 2–3).

[16] Systematic violence is one of the forms of oppression that Iris Marion Young discusses in her "Five Faces of Oppression" (1990, 61–63).

(nonpassing) trans women is in tension with this aim of feminism. Using a feminist account of "woman" that excludes (nonpassing) trans women fails to respect trans identities and thereby supports a cultural assumption that motivates and is used to justify sexual violence against women. Therefore, it is crucial to the aims of feminism that a feminist account of "woman" be trans-inclusive.

According to Bettcher, gender presentation is taken to communicate genital status. I would like to suggest, further, that gender presentation more broadly communicates sexual availability. Specifically, *female* gender presentation is taken to communicate sexual availability for men—where sexual availability for men includes female genitalia and a heterosexual interest in sex with men.[17] Bettcher argues that the communicative connection between gender presentation and genital status underlies the trans panic defense (which has been used to defend perpetrators of transphobic violence). She compares the denial of authenticity at work in the trans panic defense to the denial of authenticity that is employed in shifting blame to victims of sexual violence. Here, I want to suggest that the communicative connection between gender presentation and sexual availability

[17] Note that the way I define and discuss sexual availability here does not have the implication that gay men are counted as women on my account. First, here I am discussing the communicative nature of female gender presentation, and I suggest that female gender presentation communicates sexual availability to men. I am not suggesting that sexual availability to men is what defines a woman but rather that it is what is communicated by female gender presentation. Second, I define sexual availability as discussed here as the possession of female genitalia and a heterosexual interest in men. That is, when I claim that female gender presentation is taken to communicate sexual availability to men, I mean that female gender presentation is taken to communicate female genital status and a heterosexual interest in men. Gay men meet neither of these criteria, so even if I was offering a definition of woman based on perceived sexual availability to men, gay men would not be perceived as being sexually available to men in the way I am discussing here. Similarly, my statements here would not exclude butch lesbian women from the category "woman." Again, my comments about sexual availability identify the communicative thrust of female gender presentation rather than circumscribing who counts as a woman. Consequently, these comments would not exclude butch lesbian women from the category "woman." Additionally, later in the paper I demonstrate how even nonpassing trans women can be oppressed as women simply by recognizing that they are the type of person to whom certain oppressive norms of femininity apply. If, as I believe, my account applies to the trans woman in Jenkins's scenario 1 (i.e. the trans woman who does not publicly present as a woman), then butch lesbian women would also count as women on my account.

both motivates and is used to justify sexual violence against women as well as transphobic violence.

When a woman adopts a feminine gender presentation, she is taken to be communicating her sexual availability—she is communicating female genital status but, more importantly, she is taken to be communicating an interest in sex with men. Marilyn Frye expresses this idea in the following:

> It is a sort of implicit theory of women's sexuality according to which a woman who largely adheres to patriarchal feminine norms in act and attitude and who does not radically challenge or rebel against patriarchal institutions is heterosexual, and a woman who does not comply with feminine norms or who seriously challenges or rebels against patriarchal institutions is a lesbian. (1992, 127–128)

When a woman refuses a man's sexual advances, the assumption that her gender presentation is communicative can be invoked and used to undermine her expressions of disinterest. That is, in some cases, gender presentation overrules a woman's expressed disinterest in sex. In this way, the communicative connection between gender presentation and sexual availability *motivates* sexual violence against women by undermining the authority of women's refusals of sexual advances. Further, in cases where a woman has been a victim of sexual violence, blame is often shifted to the victim by alluding to the victim's attire. Specifically, remarks are often made about the victim's attire, suggesting that, by her gender presentation, "she was asking for it." In this way, the communicative connection between gender presentation and sexual availability is used to *justify* sexual violence against women.

Similarly, Bettcher (2007, 56) claims that much transphobic violence is motivated and justified by the idea that trans victims "deceive" their assailants by presenting a gender that does not align with the genital status that they were assigned at birth. That is, trans women in particular are often subjected to violence that is motivated by the assailant's anger at discovering that the woman he was sexually interested in (or intimate with) is "really a man." Underlying this violence is an assumption that trans identities are illegitimate or false. In this way, the communicative connection between gender presentation and sexual availability *motivates* transphobic violence. Additionally, the assumed illegitimacy of trans identities is used to defend perpetrators of transphobic violence. Again, blame is shifted to the victim because it is asserted that the victim has misrepresented her "true" identity by presenting as a woman when her genital status at birth is thought to make her "really a man." In this way, the communicative connection between gender presentation and sexual availability is used to *justify* transphobic violence.

Insofar as the same cultural assumption about the communicative connection between gender presentation and sexual availability motivates and is used to justify both transphobic violence and sexual violence against women, anything that supports this cultural assumption also contributes to transphobic violence and sexual violence against women. Failure to respect trans identities supports the notion that trans people are deceivers because of the misalignment of their gender presentation and their genitalia. In other words, failing to respect trans identities supports the identification of trans people as deceivers because of their violation of the communicative connection between gender presentation and sexual availability (specifically genital status). Because failure to respect trans identities supports the communicative connection between gender presentation and genital status, it contributes to transphobic violence and sexual violence against women. Insofar as sexual violence against women (and women's resultant fear of being subjected to such violence) is a feature of women's oppression, failure to respect trans identities contributes to the oppression of women. Therefore, failure to respect trans identities conflicts with the feminist aim of eradicating women's oppression. Consequently, using a feminist account of "woman" that fails to respect trans identities by excluding (nonpassing) trans women undermines the feminist commitment combatting women's oppression.

IV. Feminist Discourse: Understanding Women's Oppression

As stated above, feminist discourse is intended to advance our understanding of the oppression that is faced by women *as women*. As Haslanger claims (and Jenkins seems to agree), successful feminist discourse requires the use of a definition of "woman" that allows us to focus our analysis on those individuals who are oppressed by sexual subordination: "For the purposes of critical feminist inquiry, oppression is a significant fact around which we should organize our theoretical categories; it may be that nonoppressed females are marginalized within my account, but that is because for the broader purposes at hand . . . they are not the ones that matter" (2012, 240). If it is the case that nonpassing trans women *are* oppressed *as women*, then using an account of "woman" that excludes them cannot successfully fulfill the purpose of feminist discourse

In what follows, I demonstrate that nonpassing trans women *are* oppressed *as women,* and consequently, a definition of "woman" that is intended to serve the aims of feminist discourse must include trans women. Because nonpassing trans women are not perceived to be women "regularly and for the most part," I cannot rely on external sources of oppression to prove that they are oppressed as women. I argue that nonpassing trans women are oppressed as women because they are sexually objectified as women in some senses. First, I suggest that, as women, trans women (both passing and nonpassing) are subject to indirect sexual objectification

at the hands of cultural stereotypes that sexualize women, their bodies, their appearances, and their actions. Then, I draw on Sandra Bartky's suggestion that women can and do objectify themselves to argue that, like all other women, nonpassing trans women can be oppressed by their internalization of oppressive gender norms.

IV.A. Accounts of Sexual Objectification

Objectification typically involves a failure to recognize the objectified individual as a person and moral equal. That is, the victim of objectification is not recognized as an autonomous individual with interests and desires of her own (Cudd 2006, 165; Hay 2005, 96). Further, sexual objectification involves viewing the objectified individual as an instrument for one's own sexual pleasure, as Bartky explains: "A person is sexually objectified when her sexual parts or sexual functions are separated out from the rest of her personality and reduced to the status of mere instruments or else regarded as if they were capable of representing her" (1990, 26).

Both Bartky and Ann Cudd identify sexual objectification as a form of psychological oppression. According to Bartky, psychological oppression necessarily involves a failure to recognize the full personhood of the oppressed (29–30). Pervasive sexual objectification meets the criteria for psychological oppression because it involves viewing members of certain groups as less than full persons and, when victims of objectification internalize these views, objectification in fact prevents its victims from exercising their full personhood.

Bartky rejects the notion that sexual harassment based on sexual objectification is merely an expression of attraction or eroticism. Instead, Bartky suggests that sexual objectification involves the employment of ideas and stereotypes about women's social subordination and the appropriateness of treating women as sexual objects:

> While it is true that for these men I am nothing but, let us say, a "nice piece of ass," there is more involved in this encounter than their mere fragmented perception of me. They could, after all, have enjoyed me in silence. . . . But I must be *made* to know that I am a "nice piece of ass": I must be made to see myself as they see me. . . . What I describe seems less the spontaneous expression of a healthy eroticism than a ritual of subjugation. (27, emphasis in the original)

According to Bartky, sexual objectification plays an essential role in the social subordination of women not simply because it involves viewing a woman as a mere object but because the victim is often made aware of being viewed as a mere object

(27).[18] Sexual objectification of women is, however, far more complex than isolated instances of individual women being objectified by individual men. Cudd and Bartky both argue that women as a group are systematically objectified by the cultural emphasis on women's appearance and the sexualization of women in popular media:

> Apart from directly objectifying actions, there is also a sense in which our culture constantly, tacitly sexually objectifies women so commonly as to constitute direct, cultural, psychological oppression. Women are sexually objectified in this indirect sense when as a gender they are taken to be the representatives of sex and sexual passivity, for example, when goods are marketed to them by displaying women as objects of adornment or sexual pleasure, or through beauty pageants and pompon squads. (Cudd 2006, 166–167)

Here Cudd illustrates the way that culture indirectly objectifies women by unquestioningly representing women as sex objects whose purpose is to satisfy the sexual desires of men.

IV.B. Sexually Objectifying Stereotypes

Women (both trans and cis) are objectified by sexually objectifying stereotypes that are dominant in our society. Such objectifying stereotypes play a significant role in the social subordination of women as a group. Even if nonpassing trans women are not the victims of isolated, individual instances of sexual objectification (which seems unlikely), one can still argue that they are sexually objectified *as women* by attending to the ways that they are subject to cultural sources of indirect sexual objectification.

Bettcher describes the sexualized stereotypes that are often applied to trans women but not trans men: "it is not uncommon for mtfs to be viewed as sexually available and disposable whores—a stereotype simply not applied to ftms" (2006, 179). What Bettcher here refers to as a stereotype is not simply a stereotype but a *sexually objectifying* stereotype. The stereotype that trans women are "sexually available and disposable whores" meets both the criteria of sexual objectification

[18] In contrast to Bartky, Carol Hay distinguishes between sexual objectification and sexual harassment. On Hay's account, sexual harassment is "the outward behavior that arises from sexual objectification" (2005, 96). According to Hay, sexual harassment is a group harm. In other words, women as a group are harmed by sexual harassment because it arises from and contributes to women's diminished (sense of) autonomy as a result of oppression (97).

mentioned above—it fails to recognize a group of persons as autonomous moral agents with their own wishes and desires, and it treats the objectified individuals as instruments for (men's) sexual pleasure. Further, because this stereotype applies to trans women but not trans men, it is clear that, while the stereotype is influenced by trans women's intersecting identities, an element of the stereotype is unique to the oppression of women generally. Thus, the stereotype that Bettcher mentions demonstrates that trans women as a group are sexually objectified as women by cultural sources.

Similarly, Julia Serano explains that trans women's transitions are often sexualized through the common assumption that the transitions are motivated by a desire to attract men: "The assumption that we change our sex in order to attract men essentially sexualizes our motives for transitioning, a move that disempowers trans women and femaleness while reinforcing the idea that heterosexual male desire is central" (2007, 259). Serano connects this sexualization of trans women's transitions to the rampant sexualization of women generally in our society:

> However, it's a mistake for cissexual women to view depictions of trans women as having little to do with themselves, as they are so obviously meant to dismiss both transsexuality *and* femaleness. After all, in a world where women are regularly reduced to objects of male desire, it's no accident that trans women—the only people in our society who actively choose to become women and who actively fight for their right to be recognized as female—are almost universally depicted in a purely sexualized manner. (262; emphasis in the original)

Serano's analysis of the connection between the sexualization of MTF transitions and the sexual objectification of women generates compelling support for the claim that trans women (passing and nonpassing alike) are subject to indirect sexual objectification at the hands of cultural sources in the same way as women generally.

IV.C. Self-Objectification

As a result of systematic objectification, some women internalize their objectification, such that they come to objectify themselves. Cudd discusses the way that women's internalization of sexual objectification can lead women to want to satisfy men's (sexual) desires without considering or at the expense of their own desires (sexual and otherwise): "The sexual objectification of women involves taking women to have a nature that suits them to be objects for the sexual pleasure of men, that is, to naturally desire to fulfill men's wish that they become subordinate to men, to fulfill men's desires rather than to seek to know and fulfill their own" (Cudd 2006, 166). Bartky focuses on a different aspect of women's self-

objectification—the reduction of women's identities to their bodies and physical appearance: "Subject to the evaluating eye of the male connoisseur, women learn to evaluate themselves first and best. Our identities can no more be kept separate from the appearance of our bodies than they can be kept separate from the shadow-selves of the female stereotype" (1990, 28). According to Bartky, external sources objectify women so pervasively that women themselves learn to objectify themselves by treating their physical appearance as an essential determinant of their identity and worth.

I would like to suggest that not only *can* trans women be susceptible to this form of oppressive self-objectification but also many trans women *are* victims of self-objectification as women. Further, because this is an internalized form of oppression, it does not matter whether or not the individual woman in question is classed as a woman by the surrounding members of society. Rather, what matters in determining whether or not a particular woman is, in fact, included among those who are harmed or potentially harmed by such self-objectification is whether or not she takes herself to be the type of individual to whom the cultural expectations and stereotypes apply. In other words, what matters is whether or not the individual in question *identifies* as a woman.[19]

[19] The point here is that anyone (including nonpassing trans women) who has a female gender identity can be said to be oppressed as a woman. That is, anyone who views herself as the type of person to whom the oppressive norms of femininity apply can be subject to self-objectification if they internalize these norms. Here, I would like to briefly guard myself against a potential objection. Matthew Salett Andler (2017, 883) critiques Jenkins's modification of Haslanger's account by arguing that it fails to be trans-inclusive because it "understands transgender gender identity through a cisgender frame." One might suggest that my claims about the gender identity of trans women also rely on a cisgender frame. While I cannot be certain that I have completely transcended the limits of my social position in trying to understand and theorize about the experiences of trans persons, I think that the understanding of gender identity that I operate on here differs from Jenkins's in an important way. Andler criticizes Jenkins's account of gender identity because it requires trans persons to experience bodily unification—that is, because Jenkins relies on the concept of a "map" to explain gender identity, Andler claims that her concept of gender identity precludes the possibility that some trans persons might not experience one map or the other as being fully applicable to themselves. I think that my understanding of gender identity eludes this criticism because I claim that one can be subject to self-objectification as a woman if she takes herself to be the kind of person to whom oppressive norms of femininity might apply. While perhaps not all trans women will see themselves this way, I think that it is perfectly possible

Subject to the same societal identifications of women with their sexualized bodies, trans women who want to present as women face the difficult double bind of wanting to present and be recognized as the gender that they identify with in a society that intensely associates female gender presentation with social subordination and sexual objectification. In other words, in presenting as women, trans women adopt the norms of attire and behavior that commonly reduce women to their bodies and sexual function. Serano suggests that the process by which trans women come to internalize these norms is not unlike the experience of cis women:

> Despite being socialized male, those of us on the MTF spectrum have been exposed to many of the same explicitly sexualizing cultural messages about womanhood and femininity as those socialized female, and we are just as susceptible of constructing our own sexualities and self-images around those very same cultural ideals. (270)

Specifically, the ideal image of female beauty is a slim, hairless, young woman who has large (but not too large) "assets." This image contains within it several different norms that might govern a woman's behavior in attempts to conform to the ideal: hairlessness, youth, and physical fitness.

Not only are women not supposed to have facial hair, but the norms of feminine beauty require the removal of body hair from the legs, armpits, and pubis.[20] Adherence to this norm requires extensive, regular (sometimes painful and expensive) hair removal. Women's armpits, legs, and pubis ought to be shaven, waxed, or sometimes even treated with laser hair removal. But some women take this norm even further, removing hair from their chests, arms, stomachs, feet, backs, and hands. Not only is this particular norm costly in terms of time, effort, money, and pain, but it is also somewhat unachievable in that it requires women's bodies to exhibit a characteristic that is unnatural for adult women. In other words, this norm requires women to constantly wage war against the natural process of hair growth, such that attempts to adhere to this norm are never-ending.

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that someone might perceive some norms of femininity as properly applying to themselves without experiencing bodily unification.

[20] According to a study done by Rowen et al. (2016) that investigated the prevalence of and motivations for pubic hair grooming among women in the United States, 83.8% (2,778) of women surveyed reported that they had been grooming regularly for most of their adult lives. Further, the most commonly cited situation for which women groom was sex. Specifically, 55.6% (1,544) of women surveyed claimed that they often groom for sexual situations.

A similarly unnatural norm contained within the image of female beauty is the emphasis on youth. It seems that the ideally beautiful woman ought to appear to be in her twenties long after that is physically possible. In order to achieve such results, women are advised by fashion and beauty magazines to begin anti-aging regimens as early as their late twenties. Women are sold countless creams, serums, and masks designed to fight the aging of their skin. Women are expected to dye gray hairs. And, if one is desperate, brave, and/or wealthy enough, women can undergo any of a number of expensive and painful procedures designed to give the appearance of youth—including, but not limited to, face lifts, Botox injections, and laser treatments.[21]

Further, the ideally beautiful woman also has a physique that is practically impossible to achieve, both because it is internally contradictory and because it requires extreme dedication to dieting and exercise, as Clare Chambers expresses quite clearly and succinctly: "Most women could never be as thin or as flat-stomached as the models they try to emulate, . . . breasts that are both large and pert are somewhat oxymoronic" (2008, 29–30). Women are supposed to be slim but not too muscular. Female bodies ought to be "soft" but not "fat." Further, breasts and buttocks are supposed to be round and perky, large but not too large. Such expectations of women's bodies often require adherence to extreme forms of dieting and exercise—beyond what is required or even advisable for maintaining a healthy lifestyle. Sometimes, attempts to conform to this norm involve trips to a plastic surgeon—again a costly, painful, and dangerous measure.

Many women will assert that they conform to these norms not in order to be deemed attractive to men but for their own personal comfort and satisfaction. One will often hear such women say things like, "I do this *for myself*" or "I shave because that's *my preference*." However, even if these women are not consciously trying to make themselves attractive to men by conforming to these norms, they are nonetheless trying to achieve an ideal of female attractiveness that advantages men and disadvantages women. In other words, such women have internalized what society has set up as the ideal of female attractiveness, such that they judge themselves according to an ideal of attractiveness that is based on male preferences. Thus, we see that adherence to these sexualized norms of female appearance is exemplary of Bartky's self-objectification. These women have

[21] An article on *Glamour* magazine's website discusses a particularly extreme anti-aging skin treatment that involves treating skin with stem cells harvested from the surgical discards of routine infant circumcisions. (Beth Shapouri, "This New Anti-Aging Skin Treatment Might Give You the Heebie-Jeebies, but the Science Is Fascinating," *Glamour*, March 10, 2015, https://www.glamour.com/story/this-new-anti-aging-skin-treat.)

internalized the male gaze such that, even if they are not trying to attract men by conforming to certain norms, that is the standard by which they judge themselves.

Further, these norms are harmful. The harms are threefold. First, any efforts made to conform to the norms will inevitably limit the freedom of the woman in question. Specifically, trying to conform to sexualized gender norms is costly in terms of time, effort, money, and pain.[22] Second, the ideals that many women aspire to achieve are typically unrealistic and unachievable: "Real women are not beautiful when compared with the standards expected of them" (Chambers 2008, 30). Thus, a woman may feel a sense of inferiority due to her inability to perfectly conform to the ideal image of feminine beauty. Finally, as Chambers notes, norms of feminine appearance are harmful because of the role they play in marking women as inferior members of society: "The problem with disciplinary appearance norms is not just that they are different for men and women, and not just that they are more exacting and expensive (in both time and money) for women, but that their effect is to cast women as inferior" (29). That is, oppressive norms of femininity exact not only financial, physical, and psychological costs, but also social costs—that is, they mark women as women, and in doing so mark them as individuals who occupy a subordinate social position.

Given these details about the ways that self-objectification is built into norms of femininity, we can understand how women come to sexually objectify themselves in attempting to achieve norms of feminine beauty. What is important for my purposes, however, is that trans women (both passing and nonpassing) can (and often do) take these norms to apply to themselves. Consequently, if a trans woman takes these norms of femininity to apply to herself she may come to sexually objectify herself in a way that is characteristic of women's oppression.

V. Conclusion

Developing a trans-inclusive definition of gender is essential to feminist aims—namely, understanding and combatting women's oppression. The political aim of feminism—combatting women's oppression—implicitly commits feminists to bring about a more just society. Given that failing to respect trans identities is itself an injustice and leads to further injustices against trans people, it is contrary to this broader commitment of feminism for a feminist analysis of gender to marginalize trans women. Additionally, given that sexist oppression and transphobic violence share some underlying causes, a definition of "woman" that excludes some trans

[22] The issue here is not simply that conforming to these norms limits women's freedom. Rather, the issue is that, in conforming to these norms, women's freedom is limited in an attempt to achieve an ideal that marks them as subordinate and sexualized members of society.

women may indirectly perpetuate the oppression of women. A trans-inclusive definition of "woman" is essential to the success of feminist discourse. All trans women (both passing and nonpassing) can be oppressed *as women* through cultural stereotypes and internalized oppression such that excluding them from feminist analysis would only hinder our understanding of women's oppression.

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