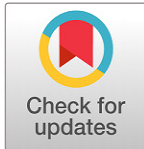


## Cross-Cultural Comparability of Queer and Trans: Unpredictable Adaptations From Within “the West”



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### Abstract

Cross-cultural and cross-language research on gender faces the recurring issue of attachment to Anglophone terminology and Anglo-American voiced experience. Queer and trans in concrete are two concepts that may count with culturally-specific counterparts. However, various power relations operate to silence or marginalize such alternative terms, uses, and pronouncements, either in Academia or even during lay or activist discussions. Such dynamics do not always follow the rigid Western/non-Western divide. The present reflection examines how queer and trans have operated within Castilian Spanish and Modern Greek, in terms of community engagement, gender subjectivation, and overall linguistic incorporation. For that purpose, this analysis draws upon two specific sociocultural contexts where the concepts in question have been recently assembled: The discussion about the latest trans bill in Spain in 2021, on one hand, and the murder of Zak Kostopoulos, a prominent queer Greek activist, in 2018, on the other. A brief contextualization of both debates shall shed light on how terminology from sexuality and gender studies has functioned to construct concrete social realities, but also political tensions with reactionary social groups. The comparison of the linguistic uses of queer and trans terminology within these contexts is expected to serve queer research related to translation and cultural adaptation elsewhere.

**Keywords:** cross-cultural research, gender studies, gender terminology, identity politics, translation

Comparabilidad transcultural de lo queer y lo trans: adaptaciones impredecibles desde el interior de “Occidente”

### Resumen

La investigación transcultural y translingüística sobre género enfrenta el problema persistente del apego a la terminología angloparlante y la correspondiente experiencia angloamericana. Lo queer y lo trans en concreto son dos conceptos que pueden tener contrapartes culturalmente específicas. Sin embargo, varias relaciones de poder operan para silenciar o marginar términos, usos, y pronunciamientos alternativos tanto en la academia como en las discusiones laicas o activistas. Tales dinámicas no



siempre encajan en la rígida división Occidente/no Occidente. La presente reflexión examina cómo han operado lo queer y lo trans dentro del castellano y el griego moderno en términos de participación comunitaria, subjetivación de género e incorporación lingüística general. Para ello, este escrito trae a colación dos contextos socioculturales concretos en los que lo queer y lo trans pasaron a la palestra recientemente, a saber, el debate en torno a un nuevo proyecto de ley trans en España en 2021, por un lado, y el asesinato de Zak Kostopoulos, destacado/a activista queer griego/a, en 2018, por el otro. Una breve contextualización de ambos debates no solo arrojará luz sobre las formas en que la terminología de los estudios de sexualidad y género ha contribuido a la construcción de realidades sociales concretas, pero también ha motivado tensiones políticas con grupos sociales reaccionarios. Se espera que esta comparación de los usos lingüísticos de la terminología queer y trans contribuya a la investigación queer relacionada con la traducción y la adaptación cultural en otros contextos.

**Palabras-clave:** investigación transcultural, estudios de género, terminología de género, políticas de identidad, traducción

Comparabilité transculturelle de la culture queer et trans : des adaptations imprévisibles de « l'Occident »

### Résumé

La recherche transculturelle et translinguistique des études de genre se voit confrontée à un problème récurrent : celui résidant dans l'incapacité à prendre le recul nécessaire face à la terminologie anglophone et à l'expérience anglo-américaine qui lui est associée. Les concepts de « queer » et de « trans » sont notamment susceptibles de présenter des contreparties spécifiques d'un point de vue culturel. Toutefois, de nombreux rapports de force font en sorte de réduire au silence ou de marginaliser ces déclarations, termes et usages alternatifs, aussi bien dans le milieu universitaire qu'au sein de discours laïcs ou militants. Ces dynamiques ne suivent pas toujours le clivage intransigeant occidental/non occidental. La présente réflexion propose d'analyser les répercussions du « queer » et du « trans » au sein de l'espagnol et du grec moderne, en termes de participation communautaire, de subjectivation de genre et d'incorporation linguistique générale. Pour ce faire, il convient de s'appuyer sur deux contextes socioculturels précis dans lesquels les termes « queer » et « trans » ont été employés récemment, à savoir : le débat en Espagne sur la dernière proposition de loi trans, en 2021, d'une part, et le meurtre de Zak Kostopoulos, un(e) éminent(e) militant(e) queer grec(que), en 2018, d'autre part. Une brève contextualisation de ces deux débats particulièrement sensibles permet la mise en lumière de la manière dont la terminologie des recherches sur la sexualité et le genre a œuvré pour construire des réalités sociales concrètes, mais aussi des tensions politiques avec plusieurs groupes sociaux réactionnaires. En comparant les usages linguistiques de la terminologie « queer » et « trans » dans de telles circonstances, nous espérons pouvoir extrapoler certaines informations sur la recherche « queer », ce qui implique également la traduction et l'adaptation culturelle.

**Mots-clef :** recherche transculturelle, études de genre, terminologie de genre, politiques identitaires, traduction

## 1. Queer, Trans, and Linguistic Representation

Nonbinary people’s representation in language is a controversial matter of growing interest worldwide. Nonbinary identities are dispossessed from linguistic conventions in the sense that their presence is systematically suppressed and delegitimized (Alabanza, 2022; Barker & Iantaffi, 2019). Speakers who ignore the existence of nonbinary individuals, or even worse, who intentionally discriminate against them, vary, from being ignorant of their visibility demands to being overtly unwilling to contribute to their inclusion. What is more, the cis imaginary, which is so tightly attached to language—especially grammatical gender language—is unshakeable for many, as pointed out by Platero et al. (2017). Jyl Josephson and Þorgerdur Einarisdóttir (2016) examine this norm rigidity as manifested in the Icelandic language. Italian is also a representative example of how language constitutes gendered realities that are maximally binary and tied to historical conventional conceptions of masculinity and femininity (Zottola, 2018).

Examples like these are discussed in a Special Issue in the *TSQ*, edited by David Gramling and Aniruddha Dutta (2016), as evidence of the fact that English dominates gender-related terminology. The neocolonial imperative of reporting research results and conceptualizing queer and trans studies in a way that reflects prevalent ideas coming from the Anglophone world leaves no space for alternative terminologies and linguistic models that stem from and proliferate in other languages. Thus, translations may abandon the particular for the universal or employ parallelisms to facilitate correspondence with English terminology, potentially improvising the value of the untranslatable, the vocabulary that resists cultural and linguistic imperialism, and the unmediated realm that purely delivers meaning right through the original term (Robinson, 2019).

This idea also coincides with a view, promoted by certain theorists, that queer has monopolized

linguistic representations, even though trans is increasingly also used as an umbrella term to encompass various expressions of gender variance. In a controversial discussion between Andrea Long Chu and Emmett Harsin Drager (2019), what is suggested is that trans studies failed to differentiate themselves from queer theory soon enough, so they got “eaten by it” even before being born.

[Long Chu:] What everyone knows is that queer theory has never had any qualms about arrogating gender as one of its primary sites of inquiry, and reasonably so, since trying to study sexuality without studying gender would be manifestly absurd. *Queer* has, from the get-go, described both gender and sexual deviance, and what’s more, gender *as* sexual deviance and sexuality *as* gender deviance. From this perspective, trans studies is just an embarrassing redundancy—junk DNA.

In trans studies, there is nothing like the rich conversations about queer temporalities that took place in queer theory in the mid-aughts, or like the recent debates over Afro-pessimism in black studies, both of which owe a lot to polemics (Edelman 2004; Wilderson 2010) and their subsequent fallouts. Instead, we have warmed-over Pieties. This is what happens when a massive offload of queer methods and concepts with the label trans hastily slapped over their expiration dates meets an influx of political capital courtesy of the current transgender identity politics (Long Chu & Drager, 2019, pp. 103–104).

If queer is defiance of the norm, destabilization, and resistance, then transgender, especially in its genderqueer facet, indeed offers no conceptual innovation to counter or displace queer. However, as shall be seen, things are more complicated than this. Even though queer might have exercised a sort of “capitalization” over other categories going far beyond sexuality issues in a way that trans has not “achieved” in the realm of gender, queer remains tied to its Anglophone sociocultural contingency. It is neither a recognized legal term nor an easy analytical category of identification (it still resists assuming ontological dimensions, at least in

theory). It could seem like a euphemism for sexual identity, but since it is not an identity but a flux, it cannot be sustained that it operates as an identity label like the rest of the LGBTQIA+ categories.

Queer theory rests on the following basic assumptions: first, the deconstruction of the main categories of sexuality and gender; second, the reappropriation of terms and notions that have historically been seen as degraded through a new, strategic lens for concrete political projects; third, the subversive defiance of identification through horizontal relationality; fourth, and consequently, an interrogation of linear historicity based on heteronormative genealogy and heritage (Berlant & Edelman, 2014; Butler, 1993; de Lauretis, 1991; Warner, 2004). As Susan Rankin and Jason Garvey (2015) explain,

Queer theory (Tierney & Dilley, 1996) challenges assumptions of sexual and gender normalcy and deviancy that have historically privileged some and silenced others. Many scholars who use queer theory in their research do so by dismantling identity binaries. Queer theory suspends normalized classifications to encompass a more social, fluid, and multiple understanding of identity (Britzman, 1995; Lugg, 2003). (p. 80)

In the process of presenting ourselves to others, our social identity encompasses sexual practices, attractions (or what is called sexual orientation), sexual identity, gender identity, gender performance, and sex characteristics (van Anders, 2015). These are many fine lines that can separately but also altogether assume queer interferences. Influenced by its phenomenological origins, queer is therefore a matter of affect, relationality, interactions with others, and reaching a *consensus* over what is true, instead of presupposing truth as a decontextualized, secured given (Berlant & Edelman, 2014). It is also a multilayered, horizontal attempt to go against dichotomous hierarchies, where heterosexuality is always in a higher position than homosexuality, manhood is always higher than womanhood,

monogamy is always higher than nonmonogamy, cisness is always higher than transness, etcetera (Rubin, 1984; Sedgwick, 1990).

In terms of the public representation of sexuality, queer was introduced as a counter-theorization against sexual (especially gay and lesbian) identity politics of the 1980s (McKee, 1997). In the late 1990s, the term began gaining certain legitimacy within the nascent mainstream LGBTQIA+ community, and current perspectives suggest it is a fluent position that reincarnates weird, necessarily unstable, and uncomfortable but still revolutionary, body sexualization (Salamon, 2010). In terms of gender identity, queer received less attention until the emergence of the genderqueer discourse. Genderqueer encompasses subjects who are not willing or able to identify with traditional categories of gender, but who also systematically fight against social pressure for definition (Bornstein, 2016; Feinberg, 1998; Tate, 2014). In that sense, it is a political category as opposed to a properly identitarian one. Nonbinary, non-conforming, fluid, and agender people could pertain to this category to a lesser or bigger extent.

As part of the poststructuralist political project, queer theory has often been accused of denying the materiality of lived experience, looking at gender as a simple theatrical performance, or falling into the same trap of definition in its attempt to defy all definitions (McKee, 1997). Not only have queer projects been seen as easily manipulated by neoliberal, marketized benefits, but they have also been demonized as synonymous with capitalist, depoliticized, and highly individualistic ideological reactions against feminist claims, reproductive rights, or familial bonds, even as apologies for pederasty (see, for instance, Binetti, 2022). Nevertheless, these contested domains have been largely re-examined and thoroughly addressed by queer theorists. Nowadays, comprehensive applications of queer theory provide social sciences, gender studies in concrete, with epistemological tools and critical stances for inquiry

(Mora, 2021; Robles, 2021; Salamon, 2010; Warner, 2004).

On the other hand, it would seem more reasonable to criticize queer theory’s overwhelmingly White Anglo-Saxon cultural heritage (Baer, 2021). Understandably, the fact that queer thought breaks with the heteronormative lineage is not sufficient to classify it as noncolonial or nonimperialist as well. In fact, unless it incorporates an intersectional framework, queer theory could easily reproduce dominant cultural schemes (Martínez Pleguezuelos, 2021; Mora, 2021; Platero et al., 2017). Aware of these proclivities, I shall venture two readings that remain within the margins of the West, or at least question its unity, in order to observe the intrinsic marginalizations and impositions that have taken place in configuring gender, sex, queerness, and transness as Western notions (Baer, 2021; de Sousa Santos, 2009; Lugones, 2008). My attempt shall remain in the theoretical realm and does not pretend to transcend the two contexts where it shall develop. These two readings may seem irrelevant to each other and applicable to very distinct sociocultural situations, but both deliberate on power dynamics in language adaptation and translation, as well as on cultural dynamics that need more careful contextualizations. Gender and sexuality are thus leakages that escape the rigid limits of the monolingualist paradigm (Robinson, 2019; Villanueva & Martínez Pleguezuelos, 2022), and as such, they incessantly multiply meanings, conceptions, and uses of language.

## 2. Applied Reading 1: The Case of Zak/Zackie, a *Kouir* Activist

Moving back to the paradigmatic shift that has permitted (still unofficial and delimited) linguistic modifications in the context of Greek, the social reality that accompanies language reforms is more than evident: in the post-recessionary era, Greece has moved toward a more assimilationist model of LGBTQIA+ politics, which culminated in the antidiscrimination

laws 4285/2014, 4356/2015, and 4443/2016<sup>1</sup> or the legal gender recognition act (4491/2017) passed on the 10<sup>th</sup> of October of 2017 (Papazoglou, 2020). Discussions on marriage equality and adoption by same-gender couples have also been taking place, and at least the three most popular political parties of the country might be willing to advance this agenda by the next legislature. However, societal changes do not only have neoliberal identity politics to thank. In 2018, even after the extreme far-right party Golden Dawn, which spread terror in the streets of Athens during the recession, had been expelled from the political sphere, the Greek society faced the rampant murder of queer activist Zak (Zacharias) Kostopoulos/Zackie Oh!,<sup>2</sup> near Omonoia Square, in broad daylight.

I reckon Kostopoulos’s murder a political turning point for the Greek queer community, for it helps to exemplify the prioritization of a series of legal rights claims, but also because it promoted an exercise of collective memory (Athanasίου & Papanikolaou, 2020). Kostopoulos summoned a series of intersections that mystified him/her in front of the eyes of the cis-heteronormative Athenian society: he/she was openly queer/*kouir* (κομήρ), seropositive, and “leftist”; he/she supported sex workers’ rights and performed as a drag queen (among few others) in underground shows. This is significant in order to address the precarity that characterized both his/her life and his/her death as well as to comprehend the legitimate fury his murder caused to several parts of Greek society. Kostopoulos was seen as a controversial figure precisely because of the uneasiness he/she embodied. Yet no one actually expected that a jewelry shop owner and a random passerby would beat him/her to death on Gladstonos Street, in plain daylight. Even though

1 Each act could be seen partly as a reification of the other, but the three fall under the “Nondiscrimination act”.

2 Zak’s drag nickname was Zackie (Oh!), a euphemistic wordplay alluding to Jackie Onassis.

the shop owner seemed to have interpreted Zak/Zackie's sudden entrance into his shop as a burglary, the fact that he ended up valuing his private property over human life, and killing for it, can by no means offer him moral alibis.

How can Kostopoulos's death correlate with the insertion of nonbinary forms into the Greek language? Although official accounts of his/her murder would not reflect any other aspect than his/her "LGBT", "homosexual" or "gay" identity, alternative media (mostly on social media, but also blogs and personal sites) would incorporate his/her queer questioning of prevalent Greek identity labels and would either mention him/her as queer/*kouir* activist or use both male and female pronouns to reflect both Zak and Zackie's facet. *Kouir* was popularized as a descriptive term especially attributed to Zak and especially due to the news of his/her murder. Of course, as with all uncomfortable stories, he/she was on several occasions denied the label "murder" as a descriptor of his/her death, the label "woman" as a descriptor of his/her drag performativity, the label "victim" as he/she was first accused of being the one to commit the crime of trespassing, and the label "decent" as he/she was viewed as a "drug addict" who was acting "under the influence of a toxic substance" at the scene of his/her murder (Kokalou, 2020).<sup>3</sup>

The story of Zak/Zackie invests the English loan *queer* with a characteristically Greek tenet, establishing *kouir* as a legitimate counterpart. Contrary to merely reflecting a direct, automatic translation, the term *kouir* is impregnated by the pain inflicted in the communitarian

imaginary upon the news of his/her tragic end. It thereby (re)politicizes queerness within the Greek social reality not as something foreign but as a folk feature or a piece of embodied, lay knowledge of the specific cultural environment. Previously, claims for the nonbinary use of the Greek language had been made, for instance, by Jason/Antigone Dane, the first person to claim their nonbinary identity before the State and to win the case in court which allowed them to change their legal name and documents to a double form. Yet, such claims had a highly depoliticized character because they operated on a remarkably personalized/individualized basis and were more mediatized and less collectively and openly discussed.

Community engagement in this story reveals a) the negotiations between autochthonous and imported terminology in the Greek language and b) how Greece is, both linguistically and culturally trapped within a complex web of influences and dynamics that cannot be exhausted following the rigid Western/non-Western divide –as somehow, it is at the crossroads of both (see Baer, 2018 for a discussion of this "limbo-position"). Until the arrival of sexual politics terminology after the 1990s, the vocabulary that described sexual deviancy in Greece was vernacular (Apostolidou, 2017): *poustis* (faggot), *aderfi* (sissy), *louktra* (poofter), *kinaidos* (something like pervert), *digidanghas* or *kragmeni* (gaylord), *kolobarás* and *thilykotós* or *kounistós* or *pisoglentis* (something similar to a top/bottom binary) were all descriptive of deviant or effeminate acts of sexual conduct. The list of queer terms would be complemented by *travelli* or *travesti* (travestite, tranny), and *anomalara* (abnormal) and be highly restricted to gay men and trans women –i.e., –all other identities or embodiments would seem nonexistent.

The issue of behavior versus identity is key in capturing the differences between the Greek vernacular vocabulary and the identity politics terminology that reached the country after the 1990s. Anna Apostolidou (2018) describes the gradual

3 On the tensions over the promulgated denominations of the incident and profiling of Zak, as well as their necropolitical connotations, see AFP (2022), Antoniadis (2020), Halva (2022) and Smith (2022). Although these three are mere examples of a more generalized tendency, each source mobilizes distinct vocabulary and imaginaries to demarcate the event (e.g., "death", "killing", "lynching to death", "murder", "queer campaigner", "gay activist", "LGBT activist", "HIV activist").

move from the stigmatizing and pathologizing labels of the medical establishment of the 50s, 60s, and 70s, to denominations that pointed to the existence of a collective category. The terminological shift reflected epistemological advances: from ephemeral homosexual acts –subject to conversion, discipline, and admonition, homosexuality began to be understood first as a deviant sexual desire, and later as a shared, stable and even self-proclaimed identity. *Gkei* (gay) began to conquer the late twentieth-century public sphere on homosexuality, substituting *omofylofilos* (homosexual) and *aderfi* under a positive(-ist) lens, but was also met with suspicion and distrust (Apostolidou, 2017). This distrust was a sign both of resistance towards Western mimetism, and of a generalised difficulty to embrace liberational politics after decades of clandestine existence. Wholly, even by the time the medical establishment had depathologized homosexuality, to be defined as “gay” was not always an acceptable option.

This brings us back to the discussion of queer/*kouir* and nonbinary or inclusive language. If gay politics arrived in Greece with great delay, this was not only due to stagnant sociocultural frictions and repositioning, but more importantly, to linguistic tensions that did not allow for the blind acceptance of the 80s–90s Anglophone thought regarding sexuality and gender. This same “delay” can be currently observed in queer politics, and with the generalized tendency of politics toward umbrella-type solutions to intersectional representation. It was not until the triggering effect of Zak/Zackie’s murder that the Greek language was obliged to address what it had been avoiding for at least three decades: how to diversify or fluidify the assumption that the masculine counts as generic (Vasallo, 2021); how to address identifications that do not affiliate to the conventional norms of male and female grammatical gender (Antoniadis, 2020); how to incorporate affective events that do not fit the stipulated linguistic schemes; lastly, how to openly negotiate the imported terms in a lived and shared way and

not simply as part of a conceptual or academic “package”.

To further instigate the effects of this cultural momentum, I shall appeal to a personal experience. In May 2021 and May 2022, I attended two consecutive editions of an online Conference at the Aristotle University of Thessaloniki concerning gender terminology. The discussions had two main focal points: the first one was gendered language concerning professions following a more traditional feminist approach to the assimilation of women in the public sphere through language; the second one was about inclusive language. The latter approach was more focused on queer readings of the structure of language, opting more for destabilization and deconstruction, and less for incorporation. In an afternoon debate of the first version of the Conference about the almost uncritical incorporation of gender terminology from Anglophone academia, many participants agreed on the inevitability of depending on foreign loans, especially from English. Suddenly, an assistant professor among the participants turned on her microphone to verify that, at least in her classes, she uses the word *to kouir/ta kouiria*, that is, queer translated into Greek and used both in the singular and in the plural form. To contextualize the appearance of the word in the conversation, apart from exploding like a bomb to our ears, the term sounded very strange and made the audience uncomfortable —indeed the kind of incommodity queer represents anyway. This alienating auditory experience evidenced the birth of new terminology, contrary to the dominant opinions not only of that Conference but of the Greek academy as a whole.

By the time the second conference was held, opinions had radically changed. During the rest of 2021, many turbulences shook Greek public speech on gender. A lot more participants accepted and use the term *ta kouiria*, alongside *ta mathitá* (a nonbinary form of the students in Greek), *ta foititá* (a nonbinary form of college students), or *ta erevmitá* (nonbinary form for

researchers). Those terms are all nonexistent in the official Greek language and are neuter transformations of normally binary terms—in Modern Greek, grammatical genders are male, female, and neuter only for inanimate objects while proper nouns are exclusively male or female. Hence, apart from the evident dehumanization these neutralizations suggest, they are also exercises of queer cacophony, resistance, and expansion of the limits of the Greek language. It was surprising to witness such a shift in consensus after only one year. Of course, this observation is biased: the participants of the Conference and their willingness to deconstruct official language forms are not representative of the attitudes of the rest of the Greek linguistic community. In any case, the example may serve to demonstrate how language is (still) an incessantly malleable and negotiable construct.

Thereupon, in the case of Greek, consensus on the nonbinary use of language is far from accomplished. Beyond the extremely limited literature on the matter, there is also a lack of lived experience to confirm that nonbinary language is employed under certain criteria: the rules, exceptions and (political but also linguistic) implications of such usage are still subject to definition. As a result, some people opt for substituting male animate forms for the neuter ones; others avoid the neuter despite being nonbinary themselves in fear of submitting themselves to their own dehumanization; in turn, others hesitantly try to figure out alternative approaches even in the form of a neolanguage. For instance, I use a conceivably unintelligible nonbinary alternative by imitating the Spanish suffix  $-\chi$  in Greek. Instead of saying *ta kouiria*, as the aforementioned professor did, I would write *tx kouirix*, which, since  $\chi$  is a consonant, would also raise a pronunciation issue. Acknowledging this serious disadvantage of my selection, I also find it relevant to offer a dysfunctional, uncomfortable, highly illegible, and unacceptable challenge to what is supposed to be transparent, easily assimilated, and massively followed. A queer approach to

language embraces uneasiness as part of the deconstructive process.<sup>4</sup>

### 3. Applied Reading 2: The Case of Sexual Identity in Spanish Law

Spanish offers a relatively different story in terms of how it deals with loans and cultural appropriations. Still, it is equally appealing to evidence the negotiations and power dynamics that have been deployed to handle, even counter, English assimilationism. Firstly, the efforts supporting the legitimacy of nonbinary forms of language have been hotly contested by the Royal Academy of the Spanish Language (*Real Academia de la Lengua Española*, RAE). The institution, which allegedly determines and informs upon the correct and erroneous uses of Spanish throughout the enormous Spanish-speaking community, has exercised its authority chiefly by opposing itself to attempts to flexibilize binary terms. It has also been emitting declarations about the intelligible and unintelligible forms of “doing language” in everyday speech performances. In other words, the RAE’s main defense against the increasing claim of nonbinary terms has been that those are rendered, among other issues, hard

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4 This is also especially polemic in the growing quest for the facilitation of transparent solutions regarding reading tools for people with disabilities. Regularly, universities discourage the use of hard-to-decipher inclusive language forms such as the @ or the -x. What I am sustaining here is that a political project that wishes to destabilize the conventional forms of suffixation and generic inclusion, but in the meantime fears that some people are not going to have access to the result of such destabilization, fails to understand what discomfort is all about. In other words, it is not only deciphering mechanisms that shall have a hard time recognizing words and translating them for people with disabilities; whoever reads the alternative forms is meant to have a hard time comprehending. Inclusive language under a queer lens is not so much inclusive as it is problematizing.



to perceive by language users, hence compromising meaning-making (López Rodríguez, 2020).<sup>5</sup>

Notably, the RAE’s conservatism serves to preserve the well-established androcentric structure of Spanish. This logic does little to interrogate the power differences bestowed upon mechanisms such as the generic masculine form:

It is not only that the masculine is invested with neutrality, it is also the idea that a single form represents all, that there is a universal, and it is the search for that universal. And the dispute to find the formula that represents us all (be it the –a, the –e, the –i, the –x, the –@, the unwinding or any other) is disastrous, since it continues to affect the idea of universal representation and continues to confuse enunciation with enumeration, with the catalog.

It is not only that a perfect gender language that represents us all does not exist, it is that there cannot be one, we do not want it to exist (Vasallo, 2021, p. 101; own translation).

Spanish faces very similar assimilation tensions to the ones described in the case of Modern Greek,<sup>6</sup> although it would be naïve to directly compare the implied dynamics in relation to

English.<sup>7</sup> It would even be counterproductive in the sense that Spanish is spoken by a significantly larger worldwide community, hence its rapid evolution in gender terminology almost daily and at several levels; in addition, Greek adapts to linguistic imperialism in a much more submissive way than Spanish, particularly in gender studies, since there is hardly a national or cultural counter-paradigm in Greece to draw upon. What interests this text is not to sketch straight parallel lines on the matter; on the contrary, I wish to observe different phenomena of linguistic negotiation, revealing the permeability of the heteronormative structuring of language as a symbolic system.<sup>8</sup> For that reason, and to more closely inspect Spanish adaptations of English reasoning, I shall switch from the discussion of pronouns, gendered forms, and queerness, into a more severe conceptual misalignment, that of the notions of transsexuality and sexual identity (a very queer problem, indeed).

The fact that the terms *identidad sexual* (sexual identity) and *identidad de género* (gender identity) frequently converge in Spanish may suppose serious epistemological conflict and misconceptions, especially in translation from and into English. Is *identidad sexual* a metonymic way of talking about non-normative sexualities such as male homosexuality, lesbianism, bisexuality, or asexuality? Or is it a metonymy of transsexuality? Is it the same to talk about sexual identity and gender identity, and if not, what are their main differences? These may seem like questions with clear answers, yet they are more complicated than they seem. On many occasions, the Spanish academia may complain about faithfully and sometimes even

5 Similar resistance to change is palpable even in automated corrections in our devices: phones, PCs, and tablets. All indicate that alternative ways of representing gender in language are to be resisted for they are programmed to indicate that any change in the conventional forms is to be read as a mistake. Inclusive language is highly contextual as well: administrations openly reject it, “serious” public dialogue defies it, and even in inclusive environments of queer collectives, it sometimes still feels “artificial”, “misfit”, “uneasy”. Its artificiality is a strategic weapon, but only depending on the context which will know how to (in-)appropriately take advantage of it.

6 This might be related to the fact that both Spanish and Greek are grammatical gender languages, meaning that they prioritize gender segregation by assigning male and female forms to nouns.

7 Moreover, Spanish lacks a neuter form, thereby all nouns, animate or inanimate, are either male or female.

8 I have been implicitly aspiring to integrate pluralist/Whorfian views with universal grammar approaches, resisting the temptation to fall for an *either/or* reading where one wins over the other (Barker & Iantaffi, 2019).

uncritically following English terminology in gender studies; interestingly, though, there are no definitive or clear-cut transfers from English to Spanish in this debate.

*Sexual identity* in English refers to an identity derived from the systematized expression of sexuality, and not so much from sex as a biological category (Rosario et al., 2006). In other words, sexual identity is not necessarily defined by primary or secondary traits of sex, even though these traits are implicated in human sexuality. Conversely, these are forms (not entirely inescapable or assured) of categorizing people in terms of their sexual desires, the manifestation of their sexuality.

If *identidad sexual* is used as a synonym of bodily transition, it remains closer to *identidad de género* than to *identidad homosexual*. This might risk blurring what *identidad sexual* really means, which is *not* sex identity, but the identity at the level of sexuality (physical attraction, affective bonding, construction of one's self-concept based on sexual orientation). For Sari van Anders (2015), sexuality is a multidimensional construct. In fact, her study is one of the most referential compilations because it achieves reporting robustly and systematically the attempts to theorize sexual orientation at least in the last two decades. It maintains the useful distinction between sexual behavior/arousal, sexual orientation/attraction, and sexual identity/self-concept, but also proceeds to a fairly complex schematization of sexuality, understood as sexual desire (physical, emotional, and intellectual).

When sexuality seems directly derived from sex, a second epistemological confusion is risked: that of equating sexuality to procreation. Furthermore, the physical component (secondary sex characteristics, for example) becomes disproportionately important when coitocentrism and reliance on the genitals are endorsed as major components of human attraction. In this way, sex is naturalized as the signifier of physical attraction *par excellence*,

even if in reality other people are not categorized by their actual sex characteristics but by body recognition mechanisms based on visual cues. Mimicking the Anglophone perspective, if what is needed is a concept that indicates the identity attributed by the sex assigned at birth, it would be more convenient to speak of *identidad de sexo*, with *sex identity* as its English equivalent. Through the current conflation of both aspects under *identidad sexual*, sex and sexuality become equivalent or parts of the same construct (supposedly genitalia). Moreover, it is not sufficiently recognized that, even though very closely linked, sex and gender are undoubtedly two separate sociodemographic variables (Rubin, 1984; Tate, 2014). On the other hand, keeping the terms in the singular denies their contingency and paralyzes their flexibility since it is not so convenient to speak of “sexual identities” and “gender identities”, at least to describe the same person.<sup>9</sup>

Second, what in Spanish and sometimes Latin American literature has been called *identidad sexual* seems to suggest that personal identity can be defined through sex, which is understood as a biological reality (Martínez Guzmán & Montenegro, 2010; Mejía, 2006). The extent to which we define ourselves through our gonads, chromosomes, hormone levels, and primary or secondary characteristics of our sex is not at all apparent in that interpretation of the term. Equating sexual identity with gender identity in Spanish eliminates the evolution, which is very important for Anglophone transgender studies, that begins with the transsexual discourse and evolves to the transgender discourse (Denny, 2004). That is, it moves from the necessity of a full-scale bodily transition to a more flexible understanding of transitioning as mostly social. This second argument requires a cautious approach because many discourses within trans activism prefer to avoid this distinction to this very day, replacing

<sup>9</sup> Lately, *orientación* or *identidad afectivo-sexual*, translated as *affective-sexual orientation* or *identity*, has been coined to regulate the described conflations.

it with the *trans* umbrella, which encompasses a patchwork of all manifestations of gender variance (Platero, 2017; Robles, 2021).

By revisiting the transsexual/transgender divide, I do not wish to reinforce it in a binary logic of either/or, but to speak of historical processes that are not very proliferated in the literature written in Spanish, precisely because *transexualidad* (transsexuality) is used even today much more as a synonym of transgenerism than *transsexuality* is in English—in the latter, the transsexual/transgender debate is exclusively antagonistic. In Spanish, a lot more transgender people may identify as *transexuales*, without emphasising the bodily dimensions of the term, or even reappropriate the term in a way that Anglophone trans communities would not. In addition, *transgénero* (transgender) or *transgenerismo* (transgenerism) may even be perceived as artificial, even biomedical in some cases, precisely due to not having followed a linear adaptation process from English. Anglicisms, after all, do not have the same connotations that are purported by the source language: *cuir*, the Spanish version of queer, is another clear example that bears witness to that emptying of the old meaning or the transformation of the word because of its utility for a specific time and space (Platero et al., 2017).

Even if the terminological conflation discussed above, between *transexualidad* and *identidad sexual*, may seem like an interesting Spanish particularity, it might threaten a possible large-scale legitimation of bodies whose sex assigned at birth differs from their level of belonging to a social gender category. What interests me here is how and why *identidad sexual* has been used, even within the trans community and literature itself, as a settlement that is not only subjectifying but even legal. For example, while Law 09/2019 of June 27 (art. 3) of the Basque Country uses sexual identity to refer to sexual orientation, Navarre Provincial Law 08/2017 (art. 2) does not seem to clarify that sexual identity is not associated with transsexuality. These are only two indicative

cases of the ambivalent or conflicting use of the term *identidad sexual* in the legal field. One need not be a law expert to assume that a comparative approach to such autonomic laws can lead to misunderstandings and confusion for not measuring the same legal entity. Nonetheless, the Spanish Gender Recognition Act (Law 03/2007 of March 15), which has equally affected all the Spanish territory, mentions the terms *asignación registral del sexo* (assignment of registered sex) *mención de sexo* (sex mention), *sexo psicossocial* (psychosocial sex), *sexo reclamado* (claimed sex), *transexualidad* and *identidad de género*, but not *identidad sexual*. In the new Integral Trans Law, the linguistic and social category *personas trans* (trans people) appears as such for the very first time in Spanish Law.

Returning to the discussion on queer cross-language conceptualizations, any appeal to “identity” in gender studies, but also in law, carries a very serious risk of essentialization, and an association with so-called “identity politics” (Alabanza, 2022). Terminological and epistemological confusions are prone to occur when what is mobilized is “identity”. Identity politics classify social subjects in such a way that it is difficult to begin political mobilizations without previously identifying social factors through the categorizing logics of inclusion and exclusion. In that vein, identity politics sets barriers to mapping the particular intersections and assemblages between various social forces, personal desires, manifestations of intimacy, and individual biographies (see Berlant & Edelman, 2014; Sedgwick, 1990). In any case, the open debate on terminology in current legal delimitations of what transness stands for, for which territories, under which conditions, and with what kind of consequences, provides a great opportunity for queer theorists and activists to intervene and destabilize.

The fact that the debate remains open carries other types of risks, too. A certain sector of the radical feminist movement in Spain performs its own attributions to the notions of *identidad sexual*, *identidad de género*, as well as to inclusive

language, as a deliberate assault on “women’s sexed reality”. Personal identity with respect to gender and sex, alongside the ability to determine one’s own adscription to the gender categories, is frequently reduced to a kind of feeling, desire, or mere decoy, and sensationalized as an imported —inevitably always foreign— “queer ideology” (Robles, 2021; Vassallo, 2021). Likewise, trans people are often accused of falling into “globalized neoliberal traps” by moving away from the “reasoned way of perceiving (their sexed) reality” (Binetti, 2022), and of intentionally erasing women’s rights, both through language and through the law. The problem with such a conceptualization is that it obviates the complexities, contradictions, and dynamic transformations of the terminological debates that have been raised throughout this section, and reduces them to mere “ideology” (Binetti, 2022). What the discussion of gender terminology in Spanish points to is that “identity” should be carefully put into context according to whether it applies in legal-political terms (consolidated entity), sociocultural terms (as group identity), or psychological ones (an amalgam of concepts concerning the self and its relations to others), but also depending on the adjectives accompanying the word and their purposes.

#### 4. Final Remarks

The present theoretical approximation intended to discuss how a predetermined view of the West as homogenous serves to silence or take for granted local meanings and readings of gender and queer terminology. Such terminology appears to stem almost exclusively from the Anglo-American context while the unearthing of peripheral cultural and language models seems to suggest otherwise without even having to cross the projected boundaries of “the West” (Baer, 2018; de Sousa Santos, 2009). Different types of knowledge and linguistic inscriptions that are not filtered by the preponderant meaning-making mechanisms have different potentials in configuring sociocultural reality. Keeping these pieces of

knowledge and inscriptions in mind serves to counter all-encompassing pretensions and one-size-fits-all terminological biases (Robinson, 2019; Spurlin, 2017).

Queer and trans studies need to incorporate such internal tensions, to counter naive tendencies to apply corresponding terms, notions, and ideals to all “Western” cultural realities. The distance that “non-Western” environments and translations offer often seems safe enough to approximate the critiques against Anglophone queer theory and Anglophone gender studies. Nonetheless, the endogenous parameters that complicate the debate of a universal LGBTQIA+ community, which allegedly shares the same experiences, have not been sufficiently insisted on.

We depart from the fact that there is no single global experience of what *queer*, or *cuir*, is; we do not seek to impose its use, importing a set of Anglo-Saxon values, which can well be understood as a colonizing academic enterprise that seeks to become hegemonic. We do not want to claim that *queer* is something in particular either, neither that it has to be imitated nor that it is better than other perspectives or life expressions. We are interested in the *queer* perspective for it supposes a questioning, a critical look that focuses on the processes of appropriation and decontextualization of the phenomena that affect us, and that often have no name (Platero et al., 2017, pp. 12-13; own translation).

In order to observe how queer and trans have been projected on smaller sociolinguistic scales, I have utilized two imperfect but illustrative examples: one is the way in which queer has been translated into Modern Greek and adapted to the recent Greek context. The transformation of queer to *kouir* (κουήρ), both in its political and linguistic dimensions, is of course not unique to Greek. Spanish itself has introduced queer as *cuir* (Mora, 2021). In spite of that, I did not seek to mark a parallel reading of the specific term, which might be quite linear and unsurprising, but to stage distinct phenomena appealing to the same problem:

securing queerness and transness in translation when we are speaking of precisely unsettling notions. In Spanish, therefore, I have emphasized what I have considered a wrong use of “sexual identity”. The term frequently appears as a synonym for transsexual gender identity, whereas using it to denominate sexuality categories (homosexuality, bisexuality, etc.), as in English, is not secured. The issue of nonbinary or gender-inclusive language emerged, however, both in the case of Greek and Spanish — although not through an exhaustive account. Future attempts to reveal within-the-“West” peculiarities might benefit from examining the situated value of nonbinary language. The same should happen with other negotiations such as those of the potency of the notion of *transidentités* in French, the emergence of the pronoun *elli* in Catalan, or the fermentations between *transgenere* and *transgender* in Italian, to name only a few possibilities. In addition to that, future research should assume (and mourn) the rapid societal and linguistic changes that obstruct the generalized influence and persistent relevance of attempts such as the present one.

The unavoidable mediation of translated discourses intersects with queer deconstruction to create patchworks that remind us that a clear-cut, objective, aseptic, incorporeal transfer of meaning is a positivist illusion (Alabanza, 2022; Gramling & Dutta, 2016). The resemanticization or reinvestment of borrowed terminology may be invisible unless inscribed in the local context; by inscribing, we aid to reveal power impositions and negotiations. Or, to use an idea by Antonio Jesús Martínez Pleguezuelos, “it seems inevitable that by representing and translating the queer body and its specific features we are subject to knowledge structures that will determine our rewriting and the perception of *other* bodies” (Martínez Pleguezuelos, 2021, p. 109). Overall, situated meanings and terms have the potential not to simply resist linguistic imperialism, but, more importantly, to negotiate with it.

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