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July 2012

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### Recommended Citation

Fernandes, Sabrina (2012). Dilma Rousseff and the Challenge of Fighting Patriarchy Through Political Representation in Brazil. *Journal of International Women's Studies*, 13(3), 114-126.

Available at: <https://vc.bridgew.edu/jiws/vol13/iss3/8>

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## **Dilma Rousseff and the challenge of fighting patriarchy through political representation in Brazil**

By Sabrina Fernandes<sup>1</sup>

### **Abstract**

Dilma Rousseff is the first woman elected head of state of Brazil. Although her election carries symbolism for Brazilian women, claims of women's emancipation through representation must be questioned through an analysis of the Brazilian patriarchal state. This paper examines the claim that Rousseff's election opens doors for all Brazilian women. The research involves analysis of electoral statistics, media frames, and government documents, which show that, in spite of a woman president, women's representation in Brazilian government is still low in numbers and in the state agenda. The literature suggests that masculine gender hegemony and the presence of a patriarchal state undermine the creation of possibilities through women's political representation. Rousseff's weak campaign positions on gender issues indicate that her election's potential for substantive representation is still limited.

*Keywords:* patriarchy, political representation, Brazilian politics

### **Introduction**

This paper explores the ambiguities related to claim-making regarding women's emancipation in Brazil through the election of President Dilma Rousseff. On October 31, 2010, the Brazilian voters elected the country's first woman president, Dilma Rousseff, as the successor of popular Worker's Party President Luiz Inácio Lula da Silva. The media, Rousseff, and her supporters argued that her election represented a victory for Brazilian women. This claim is based on the assumption that political representation by women engenders the government and results in public policy designed to diminish overall gender inequality. This essay examines the ambiguities surrounding Rousseff's election and the first three months of her mandate.

Media reports and public statements from the campaign period in addition to public policy announcements from the first 100 days of Rousseff's administration are examined through a Marxist feminist lens in order to measure the power of women's political presence to challenge masculine hegemony<sup>1</sup> and patriarchal structures. This power is reflected in a woman politician's ability to represent other women both symbolically and substantially. The data collected will reveal that, from a systemic perspective, it is unlikely that Rousseff's election can substantially challenge patriarchal structures and promote a radical improvement in women's lives. I will argue that this is largely due to the lack of a strong position on gender issues and uncertainties regarding Rousseff's own gender awareness. In addition, although her election evokes important symbolism, the impact of Rousseff's ability to symbolically represent women as a group is diminished by the continuity of masculine hegemony in the political arena.

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### **Feminist theoretical dialogues on women, the state, and politics**

Four important theoretical concepts are useful to understanding a woman's prospective of engendering the state through politics. We must consider patriarchy and its structural stronghold of the state and how it relates to the presence of masculine hegemony. In addition, the connection between gender awareness and political representation must be made, especially since political representation may be symbolic (or descriptive) and/or substantive. Heidi Hartmann defines patriarchy as "a set of social relations which has a material base and in which there are hierarchical relations between men, and solidarity among them, which enable them to control women" (Hartmann 1976, 138). Other research on gender domination expands on this definition to argue that patriarchal systems promote the oppression of femininity by masculinity and heteronormative relations (Frank 1987). Rosemary Hennessy explains that patriarchy is differential, since "while all women as group are positioned the same (as subordinate or other) in relation to men, they are positioned differently in relation to each other and at times in relation to men in subaltern groups" (Hennessy 2000, 24).

Because this positioning is affected by other structures such as class, race, ethnicity, marital status, and sexual orientation, gender must be analysed as historical process (Cockburn 1981, 42). In fact, gender hegemony is informed by such categories while also at the core of patriarchal structures, calling for an intersectional approach to the study of patriarchy and female representation in the patriarchal state. By considering intersectionality, theory of women in politics can avoid reductionist conclusions that suggest that all women's experiences are the same or even interchangeable. Just as a white woman experiences racial inequality differently from a Black or indigenous woman, gender inequality is also informed by masculine and feminine descriptors. The assumption that women's presence in politics naturally results in the engendering of state policies is problematic, since some women are positioned differently in relation to patriarchy, whose structure reinforces masculine hegemony. In a patriarchal state, positions of authority are often considered to be masculine spaces, and those that carry more masculine descriptors tend to face fewer obstacles than those socially constructed to be more feminine. Bartky explains that femininity is an artifice that translates into a mode of "enacting and re-enacting received gender norms" (Bartky 1988, 95). Categories of femininity and masculinity help to inform the construction of personal identities and influence action (Bartky 1988, 77). The influence of categories of femininity and masculinity will be more thoroughly explored in the context of women in politics and symbolic representation later on.

In terms of public policy and the opportunity to challenge gender inequality through the state, Robert Connel reminds us that the state lies at the centre of power relations "in which patriarchy is both constructed and contested" (Connel 1987, 130). Thus, it can play an active role in the oppression of women (McIntosh 1978, 255). This is done through the pursuit of policies and institutions that secure both the reproduction of labor and the exploitation of women, which occurs not only in the labor force but also in the household through the social and family conditions that generate unpaid labor.

Women are also affected by the state through a Foucauldian framework of regulation of bodies, especially in the arena of reproductive rights (see Deutscher 2008). When the state is both patriarchal and capitalist, women are further denied access to

resources or exposed to policies that increase gender inequality. Patriarchal influence is not limited to excluding women from direct representation in the state. It perpetuates “their lack of power within the gendered political forces brought to bear on the state” (Walby 1989, 224). This argument suggests that the struggle against patriarchy goes beyond matters of political representation, as it will be explored later on.

One specific trait of the institutionalization of women’s exploitation under capitalism is the sexual division of labor, where most women are employed in low-paying jobs and in tasks defined according to the social construction of women’s “appropriate” role in society (Hartmann 1979, 187). The reproduction element of women’s unpaid labor in the patriarchal family contributes to capitalism by providing upkeep to the constant flow of workers into the labor force. Given the childrearing aspect of many women’s housework, the state is likely to create mechanisms to ensure that women can raise children to be future workers in capitalist enterprise. McIntosh outlines nurseries, maternity leave and other policies established to make motherhood more attractive and keep a high birth rate (McIntosh 1978, 269). In fact, government institutions have argued that “reproduction and children are fundamental concerns of the state” (Sapiro 1981, 713). Petchesky (1990) argues that the practice of contraception and abortion is ideologically entrenched in a bourgeois patriarchal culture. The criminalization of abortion is an evident expression of state participation in the oppression of women. Thus, Petchesky calls for the connection of reproductive rights debates to a “broader revolutionary movement that addresses all the conditions for women’s liberation” (Petchesky 1990, 17).

Other issues such as the case of gender violence are also deeply entrenched into patriarchal relations and can be enhanced by the absence of state intervention (Walby 1989, 225). Strict definitions of gender violence shadow the impact of verbal and restrictive violence on both men and women that operate through patriarchy and can also contribute to capitalist interests, such as through the commodification of bodies.

However, we must consider that although the state is patriarchal, it is not indivisible and its actions are not always uniform (Walby 1989, 224). The complexity of the state means that gender hegemony may be experienced differently by different individuals. This leads to two questions explored in this paper in the context of Dilma Rousseff’s election and presidential rule: Can political representation by women empower other women and challenge both masculine hegemony in politics and broader patriarchal structures? And what makes a woman capable of substantially representing other women as a group? While the first question deals with the extent to which a woman in power can extend her power to other women in society, the second question is relevant as it challenges the assumption that a woman politician automatically represents other women simply because of her sex.

The literature on women and politics highlights that the number of women politicians in government is insufficient to measure how much of a difference they can make to promote a public policy direction that benefits other women (Childs 2006). While a higher number of women in government may increase gender awareness within the state, their absence does not necessarily imply that gender awareness will also be absent. The assumption that women’s presence in government automatically engenders politics is essentialist and neglects the nuances involved in a woman’s identity, political orientation, and experiences which relate to circumstances such as class and race. In fact,

how much a woman is able or willing to act on behalf of other women depends on the extent of her gender consciousness (High-Pippert and Comer 1998). While some women politicians openly identify as feminists, others do not consider themselves feminists but are still very aware of gender issues. In other situations, women politicians keep away from gender issues as a whole, either reflecting low gender consciousness or a desire to fit in with the broader gender consciousness of fellow politicians. The display of gender consciousness by a woman politician affects the extent to which she can influence public policy on important gender issues such as equal pay for men and women and reproductive rights.

### **Methodology**

These theories provide a useful framework for explaining Dilma Rousseff's potential to represent women as a group. Although most of the studies about women's political representation rely on statistical data, this study examines qualitative data including original documents and secondary literature. While quantitative data is useful for measuring the number of women politicians against the past promotion of gender aware policies, qualitative information helps to identify present and future trends in a politician's ability to display and promote gender consciousness by examining discursive frames and policy directions. The choice of qualitative data is also a result of the need to highlight the presence or absence of gender consciousness in Dilma Rousseff's action and of masculine hegemony in Brazilian politics. Information for this study was collected between October 2010 and April 2011 to reflect the period between Rousseff's election and her impact through the first 100 days of her administration. Information was sourced from Brazilian media outlets, statistical reports and official government announcements. Interpretation of information is separated into two categories: symbolic and substantial. This helps to evaluate what characteristics and actions of Rousseff contribute to her ability to evoke the symbolism of shattering a glass-ceiling for Brazilian women, and what ones determine whether or not Rousseff will be able to overcome symbolism and effect material changes that benefit women through substantive representation.

Media reports are also used, since media frames exert great influence on candidate selection and often propagate gender stereotypes (see Falk 2008). Biroli (2010) argues that women politicians are not only under-represented in the Brazilian media, but their presence is also represented through gender stereotypes that contribute to the marginalization of women figures in the state. The use of stereotypes reflects the gender hegemony scenario and is informed by social constructions of femininity and masculinity. I examine news articles from the campaign period as well as articles that portray Rousseff as president elect. The media frames are used to highlight the presence of gender stereotyping in candidate choice, including what kind of women is considered capable of accessing the highly masculinized presidential office.

### **Weak Symbolism**

One of the most evident effects of women's rise to power in a capitalist and patriarchal state is the symbolism it generates. Although most of the literature on symbolic representation deals with women politicians in the United States, the analysis is applicable in any country where politics remains a male-dominated arena. Symbolic representation consists of "the attitudinal and behavioural effects that women's presence

in positions of political power might confer to women citizens” (Lawless 2004, 81). Burrell (1998) argues that symbolism is important because “women in public office stand as symbols for other women, both enhancing their identification with the system and their ability to have influence within it. This subjective sense of being involved and heard for women, in general, alone makes the election of women to public office important because, for so many years, they were excluded from power” (Burrell 1998, 151). Thus, symbolism’s importance lies in the spectrum of a politics of possibility and can benefit women from a psychological perspective leading to incentives for other women to pursue positions of authority (High-Pippert and Comer 1998, 62). However, symbolism can be strong or weak. This is influenced by many factors such as the presence of masculine attributes in woman candidates. Gender stereotyping and performances of hegemonic masculinity affect the public’s perception on what attributes contribute to a woman’s election to a high political office.

In her acceptance speech, Rousseff stated that her first commitment would be to honor Brazilian women so that women’s rise to power could become a natural event (Veja 2010a, 14). Weekly magazines *Veja* and *Carta Capital* also emphasized the symbolic representation of women in their publications. *Carta Capital*, for example, explored the expectation that her mandate might be more pluralist and create more opportunities for men and women, black and white, atheists and Christians, with no discriminations, following her promise to be a president for “every Brazilian” (Menezes, 2010). Such arguments helped to promote Rousseff’s election as both symbolically and substantively powerful, due to the assumption that the election of a woman to the presidential office indicates that Brazil has become a less unequal country.

However Rousseff’s appeal to symbolism is not strong enough to support such claims. The symbolic argument must be made carefully in order to avoid reductionist claims, since gender inequality also intersects with class and racial inequality in the Brazilian society. Rousseff’s experience as a white woman from a rich family background is still different from that of a Black woman living in a Brazilian slum. Therefore, race and class differences affect symbolism whether or not Rousseff intends to overcome these intersectional divides substantively. Another deterrent to her ability to symbolically challenge gender inequality is the fact that Rousseff was perceived by the public to have masculine attributes.<sup>ii</sup> Research on perceptions of masculinity and femininity in candidate success shows that levels of masculine descriptors are often considered more important than feminine descriptors in electoral choice, especially when running for higher political offices (Rosenwasser and Dean 1989, 83). In fact, women who were involved in politics in the past tend to be more identified with masculine characteristics, which play a role into the likelihood of electoral success. The preference for male and/or more masculine candidates reflects the presence of strong gender stereotyping in the electoral system of a patriarchal society such as Brazil. Gender stereotyping affects not only the choice of candidate by the voter, but also the candidate’s choice to run for particular offices. Women are less likely to run for positions considered “masculine”, including higher offices (Fox and Oxley 2003, 846).

The expectation of masculine attributes and the electoral success of women with such attributes are related to the social construction of economic identity in which the masculine is associated with production in the money economy while the feminine is identified with social reproduction and the domestic realm (Acker 2004, 24). Rousseff,

like many other women politicians, fell victim to what Pierre Bourdieu calls a “double bind” of women in power: “if they behave like men, they risk losing the obligatory attributes of ‘femininity’ and call into question the natural right of men to the positions of power; if they behave like women, they appear incapable and unfit for the job” (Bourdieu 1998, 67-68). This suggests that the low incidence of women in the presidential office stems from gender stereotyping regarding the masculinity aspect of the office that is expressed both by voters and candidates. The presidential office is inherently perceived to be a masculine arena, which discourages women whose dominant strengths are considered feminine from pursuing it.

In fact, the population is likely to expect women to develop masculine attributes when running for higher political office. This is aligned with Rousseff’s own view, since she has argued that her political career gave her “tougher” characteristics (Nossa 2009). As a candidate, Rousseff often struggled to find a balance between femininity and masculinity. Evidence that Rousseff was caught in Bourdieu’s double-bind is clear in the way she was at times criticized for being “too masculine” and had her physical appearance scrutinized in the media (Eler 2010; Giraldo 2009; Guerreiro 2010), while displays of femininity such as the embrace of her role as a mother and grandmother risked undermining her image as a woman who can occupy the highest position of a male-dominated sector. In one instance, former president Lula tried to reach a compromise by affirming that Rousseff was “tough – like a mother” (Sobrinho, 2010). This conflation of gender stereotypes to define Rousseff as a woman candidate led to ambiguous effects on the voting population. Polls showed that more men were inclined to vote for Rousseff than women (Bramatti 2010). While men’s inclination to vote for Rousseff may result from her portrayal as a masculine candidate, research shows that women’s choice to select a woman candidate may be influenced by both the masculinity of the candidate and the presence of a male sponsor (Vandergrift and Czopp 2011, 92). In Rousseff’s case, she was introduced and publicly supported by President Lula, who acted as male godfather to her presidential campaign (Cavalcanti 2009). In this situation, Rousseff’s selection by some women reflect the presence of internal gender bias, who are accustomed to masculine figures in positions of authority in a patriarchal society. Whereas one factor influenced voters to elect the successor of a very popular male president, the other masked challenges to patriarchy by women’s political representation due to the presence of masculine attributes that appeal to the presence of masculine hegemony within the patriarchal state.

Dependence on male support is a common factor for women candidates, especially those running for higher political positions. Rousseff received significant male support during her candidacy from President Lula. In fact, she was personally chosen by him to be his presidential successor. Her position as Lula’s Chief of Staff undoubtedly increased her popular exposure, especially since she was the first woman to occupy that position. President Lula’s support is in line with a study by Clara Araújo (2010) on representation, which indicates that family connections are the main element contributing to the entrance of women in the political arena and their election. Although President Lula and Rousseff are not related by blood, patriarchal structures are promoted by the presence of authoritarian families as well as “personalist ties” in Brazilian politics (Cleary 1999, 17), making male support paramount to guaranteeing one’s electoral success and political advancement in the patriarchal state. Polls conducted prior to the official electoral period

indicated that Dilma had little chance of defeating her main opponent, José Serra, former governor of Brazil's most populated and industrialized state, São Paulo. In February 2010 Serra was ahead with forty-one percent of vote intentions while Rousseff lagged behind with twenty-eight percent. However, after a long campaign and extensive public endorsement by President Lula, by election time polls suggested that Rousseff had gathered support from an estimated forty-seven percent of voters (IBOPE 2010). Over 55 million voters elected her in the second electoral round as Brazil's first woman president (Tribunal Superior Eleitoral 2010a).

Although her acceptance speech, the media, and other politicians suggested that other women should rejoice in the opportunity of being gender represented, her election is still not enough to evoke the shattering of a "glass ceiling" in Brazilian politics and society. The fact that Rousseff is a woman does represent a breakthrough in Brazilian politics. However, women are still paid less than their male counterparts and underrepresented in high-level jobs and political positions. Numbers from a national study indicate that women's income corresponded to 71.3 percent of men's income in January of 2008 (IBGE 2008, 15). The differentiation in income levels suggests that material factors are important measurements of the state of gender hegemony. This suggests the need to also evaluate claims to women's emancipation through substantive representation, especially since women's numerical representation in politics remains exceptionally low, such as in 2008 when there were only 45 women out of 513 politicians in congress (Araújo 2010, 570).

### **Substantive issues**

While it is evident that there is symbolic representation behind Rousseff's election (although it bears weak symbolism), the same cannot be said yet about her potential for substantive representation, which deals with differences in policy and procedures that stem from a politician's action. Although a democratic system offers women the political opportunities to make claims to equality of representation (Lovenduski 2010, 82), there is no guarantee that once women attain power, their individual representation will also lead to the group representation of women or even feminist interests. In fact, Karin Tamerius (2010, 243) argues that studies have only shown that "women matter, but they do not matter much." She states that although women of all levels of public office tend to vote in a slightly more feminist direction than their male colleagues, these differences are rarely substantively significant. And in the rare instances when meaningful differences have been found, it still seems that electing women to public office is no guarantee of an efficient representation of women's interests. Effective group representation of women must thrive on democratic procedures that "ensure additional representation for all oppressed groups" (Phillips 1998, 82). In order to promote feminist principles it is necessary that women in power represent not just themselves, but women as a group (Sapiro 1981, 702).

#### Substantive representation: Campaign issues

The lack of a gender-oriented platform was evident in the way Rousseff's electoral campaign was at times tumultuous when it came to gender issues. A noteworthy issue was the discussion on abortion rights. Her metamorphic change in position regarding abortion reflects a lack of concern for women's reproductive rights and the willingness to

compromise on gender issues to guarantee votes. It also indicates that the state is still unlikely to relinquish control of women's bodies. State control of reproduction is not only a means to guarantee an adequate labor supply, but it is also deeply entrenched in religious and patriarchal structures.

In line with the Worker's Party (PT) ideological position that abortion should be legalized, Rousseff stated before and during part of her campaign that women should have the right to choose. In 2007, she had stated that it was her opinion that abortion should be decriminalized. By September 29, 2010, two days before the first round of elections, she claimed to be personally against abortion and that she believed that every woman considers abortion a form of violence (Veja 2010b, 62-63). Although her change of position seems to be strategic in order to reverse a sudden drop in the polls that followed a campaign by Evangelical and Catholic churches against her candidacy, it also treats an important gender issue as disposable.<sup>iii</sup> The same can be said for Rousseff's position regarding homosexual marriage. While she was at first favourable to the legalization of civil unions, she positioned herself against it at the end of her campaign as opposition to homosexual rights was also fostered by church leaders and threatened to take away potential votes by some religious voters.

The expectation that her administration will further promote equal representation of women has proven to be somewhat disappointing so far. Out of 38 ministers appointed, only 9 are women, many of which were allocated to gender stereotypical ministries such as the Special Secretariat of Politics for Women. The socialist paper *Causa Operária* estimates that very little substantive representation of women will occur during Rousseff's mandate, arguing that PT even stated it would reduce women's quotas and that there have been minimal efforts to expand feminine spaces in the government, contrary to campaign promises (Causa Operária 2010). They also argued that the austerity measures planned for 2011 will adversely impact marginalized women.

#### Substantive representation: First three months of Rousseff's administration

The first one hundred days of Rousseff's mandate presented a few indications of whether or not she would be able to fulfill her claim to substantively represent women as a group. During March, dubbed "Women's Month" because of International Women's Day, her administration released a few programs designed to be women-centered. In one of the editions of the weekly "Coffee with the President", Rousseff talked about Rede Cegonha (Stork Project), a national pre-natal program (Café com a Presidenta, 2011). Other public health initiatives were also announced, such as the promotion of breast and cervical cancer prevention campaigns and the establishment of mandatory reports by health institutions to the police authorities whenever domestic violence is suspected. A national daycare program to build 6,000 daycare establishments is also in the works.

These programs will be of great benefit for Brazilian women, especially those in marginalized positions. However, such initiatives still carry ambiguities that may diminish their role in contributing to Rousseff's claims to women's emancipation, such as the reinforcement of the sexual division of labor and the social construction of what is considered to be women's "appropriate gender" function in society. Whenever analysing the promotion or the absence of gender-oriented policies, we must keep these ambiguities in mind in order to evaluate the overall performance of the state and its representative's capacity to properly represent women.

## Conclusion

The question of whether Rousseff will be able to thoroughly implement a gender-oriented platform and even move forward from her change of position during the campaign remains. The legalization and decriminalization of abortion would constitute a major breakthrough for women, but the president has remained silent on this issue. Other proposals such as equal pay, fair hiring policies, and even homosexual marriage are also at stake and will define whether or not Rousseff will take on the challenge to defy the patriarchal forces that act as obstacles to women's emancipation. Although the programs outlined by Rousseff during "Women's Month" do in fact benefit women, they do not represent a radical position towards challenging gender inequality in Brazil. Given the patriarchal stronghold of the Brazilian state, it is possible to suggest that Dilma Rousseff will encounter difficulties in trying to move forward from weak symbolism and a standard approach to gender aware policies.

Further, in spite of welcoming a woman as their national leader, Brazilian voters still seem unwilling to elect other women politicians to other political offices. Only 4.9 percent of women politicians that ran for congress in 2010 got elected compared to 11.7 percent of men (Tribunal Superior Eleitoral 2010b). If Rousseff symbolically represents women's rise to power through the highest political office in Brazil, why is it that the Brazilian people still reject women politicians at other political levels? The information presented suggests that Rousseff is not an appropriate example to affirm that patriarchal structures have been shaken and that her presidency will put forward truly feminist proposals that can promote the empowerment of women as a group. Although the presence of a female president bears significant symbolism and alludes to the power of a politics of possibility, the constant portrayal of Rousseff as a masculine leader and her lack of consistency in addressing women's issues and tackling gender inequality from a more radical position places her in a "double bind" and indicate the unlikelihood that her mandate can create more possibilities for women than a male counterpart with a feminist platform could.

Dilma Rousseff's case is worthy of being further analysed in the feminist political literature. While the literature suggests that women often face more challenges when pursuing male-dominated positions (see Heilman and Okimoto, 2007), Rousseff's trajectory suggests that it is possible to partly overcome gender-biased selection. Although her election resulted from factors such as male endorsement and the presence of masculine characteristics and, therefore, undermines the independent ability of women to succeed by directly challenging patriarchy, her ability to promote a more feminist platform is not completely diminished. This suggests that even though the election of women politicians may be a case of "falling through the cracks" of the patriarchal system, it is possible to make use of these events to directly challenge patriarchy and gender hegemony, both symbolically and substantially. Future research should utilize interviews and public survey opinions to measure the extent of Rousseff's influence as a woman against public perception of her gender consciousness and the state of gender hegemony in the Brazilian society. Internet-based media should also be explored as these outlets may provide interesting insights into the perceptions of voters and how they choose to frame Rousseff's potential to represent women.

## Notes

<sup>1</sup> It is important to differentiate between hegemonic masculinity and masculine hegemony. Richard Pringle's (2005) understanding of masculine hegemony provides useful insight into the difference. He says:

“[...] the concept of masculine hegemony does not simply refer to a dominant form of masculinity but is underpinned by select ideas of the workings of power that I find questionable. I am concerned, for example, that the concept of hegemonic masculinity is linked to a clear division between ruling groups and the dominated, a binary conceptualization of the workings of power, and notions associated with intentional rule” (Pringle 2005, 273).

While I find the term hegemonic masculinity useful to characterize certain dominating traits and performances of masculinity, masculine hegemony is used in the context of gender hegemony; that is, when masculinity dominates over femininity. Therefore, masculine hegemony is an appropriate term to describe the state of gender hegemony in the Brazilian political arena, which is highly patriarchal.

<sup>2</sup> Pierre Bourdieu's view on femininity and masculinity is employed here:

“To be ‘feminine’ means essentially to avoid all the properties and practices that can function as signs of manliness, and to say of a woman in a position of power that she is ‘very feminine’ is just a particularly subtle way of denying her the right to the specifically masculine attribute of power.” Pierre Bourdieu, *Masculine Domination* (Bourdieu 1998, 99).

<sup>3</sup> Rousseff affirmed that in spite of her decision to personally oppose the legalization of abortion, she realized that, if elected, she would have to face the issue (Trajano 2010). However, her government administration is yet to promote and/or examine any policies related to abortion and women's reproductive rights in general as of the date of this paper.

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