
The Registration of Same-Sex Unions

A Comparative Study of European Countries

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Elements for a poster – not for quotation

Final text and detailed data at:

<http://www.maks.banens.fr/recherches/sexualites/samesexunions.html>

INTRODUCTION

It is twenty years ago that same sex union registration came into life. Demographical studies started a few years later. They immediately noticed contrasting registration frequencies between countries (Festy 2001). Festy presumed different levels of rights, especially those accorded to non-national same sex partners, to account for part of the different frequencies though detailed data was missing. Some years later, he explored this hypothesis in more detail and ended up by rejecting it (Festy 2006). Material advantages for same sex union registration might influence registration behaviour, but along with other trends like the individualization of social rights and the decline of pro-marital attitudes. Social acceptance of same sex unions and parenthood were contextual variables also to be taken into account. The mixture of these contradictory factors made it hard to predict national frequencies of same sex union registration.

Not surprisingly, Scandinavian demographers were first to analyse partnership registration (Jepsen and Jepsen 2002; Noack et al 2005; Andersson et al 2006). They found geographic concentration of partnerships in the capital areas and specific characteristics of what they called the group of pioneers, i.e. those who have registered within 12 months after the law entered into effect. The pioneers turned out to be older than the succeeding couples, closer in age and more likely to be a sociologically homogeneous couple of Scandinavian men. More generally, gay unions were found to be have significantly larger age difference than opposite-sex unions. They were also more often mixed unions between a Scandinavian and a non-European partner. Neither of these characteristics were found among lesbian unions. These showed more sociological and geographical homogeneity. Surprisingly, lesbian unions also

showed higher divorce risks. The higher risks remain if compared to childless opposite-sex unions.

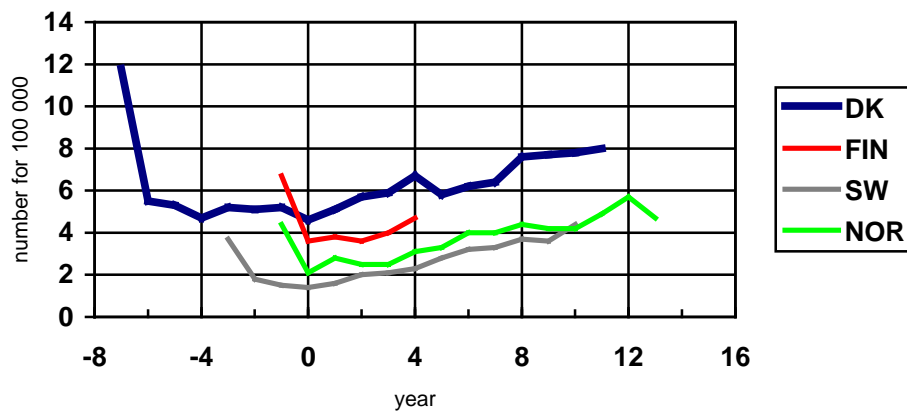
The characteristics of same sex unions in the Scandinavian context seem to confirm the results of Rosenfeld and Kim (2005) in the United States. They analysed interracial and same sex unions compared to white-to-white heterosexual unions through the 1990 and 2000 censuses. Not surprisingly, they found significantly more mobility and more urban concentration among "non-traditional", i.e. interracial or same sex unions. They conclude mobility makes young adults more independent of their parents especially in the choice of their life partner.

In this paper, I would like to examine some of these suppositions in the light of recent data coming from twelve European countries. Registration frequencies keep on ranging very widely. The range is much larger than for opposite sex union registration. So what make nations so different towards same sex union registration? I am afraid we will not be able to get to a satisfying answer, but I do think we can make a small step to clarification.

A FOUR STEP FREQUENCY PATTERN

Let's first look at the Scandinavian countries, where the series of registration numbers are longest. Figure 1 shows the number of same sex unions yearly registered in the four major Scandinavian countries. Similarities are striking. Though the introduction took place at different moments in time, from October first 1989 (Denmark) to March first 2002 (Finland), the curves show a very similar pattern, just shifted along the vertical axis. The first year of registration always shows the pioneer effect analysed by Andersson and Noack. This pioneer effect runs out more or less quickly, bringing the curve down to its lowest value, the base level. We may consider this value to be the starting level, considering that it reflects the real annual registration frequency at the beginning of the same sex union registration career after retrieving the pioneer effect. Most countries reach this level in two or three years. Denmark seems an exception, it reached the lowest value only after seven years, but, as the figure shows, the third year was at 0.1 point of the lowest value. It is the eighth year that seems atypical.

Fig 1. Registration of same sex unions for 100 000 inhabitants, Scandinavian countries; year 0 is year of lower value. First value, annualised, combines incomplete year of introduction (if any) and first full year of registration.



The third part of the pattern is the slow increase of frequency from the base level on. This increase is observed for all major Scandinavian countries (Iceland's figures are too small to be regular) and seems very similar for the different countries. Obviously, it will lead to a fourth step in the frequency pattern, where the increase will turn into a platform or any other shape of the curve. We just don't know yet at what level this will happen. No country so far, even Denmark after 19 years of registration, has reached it.

So far, we saw the similarity of the patterns. Let's see the differences. The main difference is the shift along the vertical axis. At any moment of the curve, Danish registration frequency is almost three times as high as Swedish frequency; Norway and Finland are in-between.

This rather constant, but major difference in registration frequencies is what we should try to explain with the help of more data from more countries.

Seventeen more countries have introduced same sex union registration: Iceland (first registration in 1996), the Netherlands (1998), France (1999), Belgium (2000), Germany (2001), Luxemburg (2004), New Zealand (2005), Spain (2005), Canada (2005), the United Kingdom (2005), Andorra (2006), Czech Republic (2006), Slovenia (2006), South Africa (2006), Switzerland (2007), Uruguay (2008) and Hungary (2009). Unfortunately, none of these countries can be studied as the four Scandinavian countries of figure 1. Iceland, Andorra, Luxemburg and Slovenia are too small to produce regular figures. Germany, France and Canada do not publish national same sex union figures. Belgium does publish same sex marriage and same sex registered cohabitation figures but the latter include same sex duos that are

not sexual unions. The Netherlands publish “new” same sex partnership figures, i.e. partnerships that were not a marriage before, but do not publish “new” same sex marriage figures. The other countries introduced same sex union registration too recently to show more than three years of registration. They show the pioneer effect and the presumable base level, but none of them started the increase phase. This brings us to limit the analysis to these two observations: pioneer effect and base level. They are closely related as shows figure 2. My working hypothesis is that these elements determine the level of same sex union registration as they did in the Scandinavian countries.

INTRODUCTION EFFECT AND BASE LEVEL

Fig 2. Extended first full year registration rate and presumable base level, 12 European countries. Number of registrated same sex unions for 100 000 population. Data sources in text and appendix.

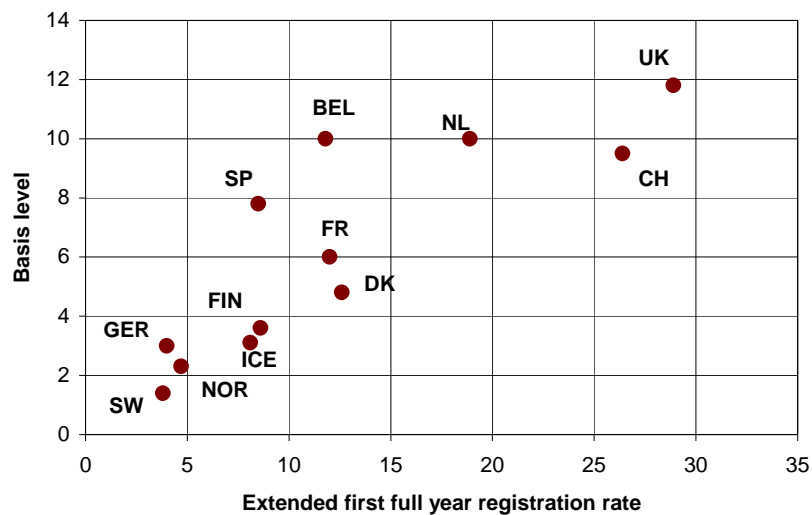


Figure 2 shows extended first full year registration rates and base level values for twelve European countries. Values for Germany have been estimated on the basis of LSVD collected data (see references and appendix). Belgium estimates are minimum estimates, using the registered same sex marriages but no same sex registered cohabitations. Swiss and British base values have been estimated as the third year of registration value (for Switzerland, the third year has been estimated on the basis of the first five months trend). It may be clear that figure 2 contains many uncertain estimates. It shows nonetheless a clear relation between the year of introduction and the base level. In other words, all the curves start pretty much the same way and the base level is a valuable indicator of the level at which registration behaviour starts off in each country. The problem we faced has now become bigger

than it was. UK, Switzerland, Belgium and the Netherlands have same sex union registration levels five to eight times higher than Sweden and Germany. What does this tell us about the social organisation of homosexuality in these countries and more generally about the modernization of families and unions?

To answer this question, let's pick up the contextual hypothesis: does social acceptance of same sex unions stimulate registration? The answer is no. A Gallup poll in 2003, confirmed by a Eurobarometer poll in 2006, ranged the Scandinavian countries among the most tolerant towards homosexuality (Gallup Europe 2003; see table 1). True, they were the pioneers of same sex union registration, but their registration rates are among the lowest of Western Europe. Is it because of Scandinavian presumable lack of interest in marriage and family? Again the answer seems to be no. Denmark, Finland and Norway feature the highest nuptiality rates of our sample. No simple explanation seems to work.

A sample of twelve countries is too small to allow a statistical analysis, but monographic description may bring some elements of understanding. Chronology, then, seems the best entrance into description. The twelve countries may be split up into three waves spreading from Scandinavia to Western Europe and from there to its peripheries: Denmark, Norway, Sweden and Iceland introduced registered same sex partnerships between 1989 et 1996, they make up the first wave. The Netherlands (1998), France (1999), Germany (2001), Belgium (2003) and the Scandinavian latecomer, Finland (2002) form the second wave at the heart of continental Western Europe. From there, a third wave has spread into its periphery: Spain (2005), United Kingdom (2005), Czech Republic (2006), Slovenia (2006), Switzerland (2007) and Hungary (2009). In the years to come, a fourth wave may continue this peripheral movement towards Ireland, Portugal and Italy.

	DK	NO	SW	ICE	NL	FR	GER	FIN	BE	SP	UK	CH
Base level	4.8	2.3	1.4	3.1	10.0	6.0	3.0	3.6	10.0	7.8	11.8	9.5
First full year rate	12.6	4.7	3.8	8.1	18.9	12.0	4.0	8.6	11.8	8.5	28.9	26.4
First full year	1990	1994	1995	1997	1998	2000	2002	2003	2004	2006	2006	2007
Lesbian to gay rate until 2008	80	80	98	91	96	55	67	144	82	50	75	40
Mean 2001-2008 crude nuptiality rate	6.8	5.1	4.7	5.6	4.8	4.6	4.7	5.3	4.2	5.0	5.1	5.4
Mean 2001-2008 crude divorce rate	2.7	2.3	2.3	1.8	2.0	2.1	2.4	2.6	3.0	1.2	2.7	2.5
Mean 2001-2008 births out of marriage rate	45	51	55	64	33	47	27	40	32	23	41	13
Type of legal status	s	s	s	s	u	u	s	s	u	u	s	s
Adult homosexuality legal since	1933	1972	1944	1940	1813	1790	1969	1971	1795	1822-1979	1967	1942
Gallup 2003 Social acceptance of same sex marriage	82	66	70	-	80	58	65	56	67	68	48	65
Gallup 2003 Social acceptance of adoption by same sex couples	54	37	42	-	64	39	57	30	47	57	35	47
Eurobarometer 2006 social acceptance of same sex marriage	69	-	71	-	82	48	52	45	62	56	46	-
Eurobarometer 2006 social acceptance of adoption by same sex couples	44	-	51	-	69	35	42	24	43	43	33	-
Part of aged 20-29 living with parent(s)	15	38	-	-	31	33	37	23	-	66	30	31

Table 1. Same sex registration indicators for 12 European countries.

Base level: lowest level ever reached, usually two or three years after start of registration. Germany has been estimated on LSVD collected figures. Belgium minimum values, some same sex unions may have been registered as registered cohabitation. UK third year is supposed base level. Swiss third year has been estimated from the five first months of 2009.

First full year rate: annualised rate including incomplete first year and first full year. Germany has been estimated from LSVD collected numbers.

Lesbian to gay rate: total number of lesbian union for 100 gay unions, from start till end of 2008 (some countries 2007). French data are estimates published by Carrasco (2007).

Type of legal status: separated (s), i.e. for same sex unions only, or universal (u), i.e. for same sex and opposite sex unions. Norway and Sweden have recently (2008 and 2009) moved from a separated to a universal type, they are mentioned as separated here.

Part of aged 20-29 living with at least one parent in 2001. Denmark has been estimated by extrapolation of 20-24 aged detailed data.

FIRST WAVE : THE SCANDINAVIAN COUNTRIES

We noticed the very low base levels of Sweden (1,4 for 100 000 population), Norway (2,3) and Iceland (3,1). Denmark, slightly higher (4,8), brings the mean first wave base level at 3,7 for 100 000 (against 6,1 for the whole sample). So one of the first characteristics of the first wave is its low registration frequency: the countries that first introduced same sex union registration are the last to use it. In this respect, Sweden is quite exemplary. It is the country where registration is lowest, but it is also the country from where the introduction wave started. Indeed, Denmark was first to vote and introduce the registered partnership, but the initiative came from Sweden (Rydström 2008, Digoix 2008). As Therborn (2004) points out, Sweden has played a pioneer role for family innovation since the beginning of the 20th century. Even before socio-democrats were in power, Swedish new Family Code (1915) declared man and woman equal in marriage. It was more than a feminist position. It was anti-patriarchal, protecting children's rights as much as those of women. Divorce and contraception were legalized and woman labour participation promoted, even during the pronatalist politics in the thirties, according to the "social engineering" ideas of Gunnar Myrdal. When divorce, prenuptial cohabitation, nuptiality decline and out of marriage births took off in Sweden in the sixties and seventies, before spreading to Denmark and further to the south and west, it was based on well established and legally prepared independence of spouses and adult children. The independence that Rosenfeld and Kim observed in the US as the result of mobility has been achieved by social and political reforms in Sweden. Bernhardt (2004) states extramarital cohabitation is now considered equal to marriage, in Sweden. Yet, she observed most Swedish youths think they will marry one day. As she puts it, marriage changed function: it has no legal and no material motivation anymore. It is just a declaration of commitment, to others and to each other. The Swedish family politics defining individual well-being to be the goal of family and marriage have individualized as much as possible social and fiscal rights and obligations, leaving marriage as an empty shell. That is why Karin Lützen (1998) stated that same sex couples were given marriage rights from the moment on these had been granted to any cohabiting couple.

Sweden was the motor, but Swedish legislation procedures are long. Sweden has continuously been bypassed by other Scandinavian countries. A first time when Denmark introduced the registered partnership. A second time when Norway opened up marriage to same sex unions. Each time, Sweden was at the beginning of the procedure (Rydström 2008, Banens and Mendès-Leite 2008). This suggests an overall Scandinavian process of family innovation and same sex acceptance. Indeed, marriage has declined early and out of marriage births are particularly numerous in all Scandinavian countries. Same sex acceptance, though, is particularly high in Denmark and Sweden, but not so in Norway and

in Finland (see table 1). These are also the two Scandinavian countries where adult homosexuality has been legalised rather late: 1972 for Norway, 1971 for Finland, where "promoting" homosexuality is prohibited until 1999.

The rather low levels of same sex union registration in all Scandinavian countries seem related first to the highly individual-based social and economic system, secondly to small needs of declaring long-term commitment. In spite of high social tolerance, the need to declare one self as a couple, to come out as a couple, seems weak. Maybe we should say that it is weak because of high social acceptance.

SECOND WAVE : CONTINENTAL WESTERN EUROPE

The second wave has been less homogeneous. At the one hand, Germany and Finland continued the Scandinavian experience. They introduced a separated same sex partnership and their registration levels are as low as the Scandinavian. They were slow for different reasons though. Finland has modern marriage and family patterns, but legalisation of adult homosexuality is recent and social tolerance still particularly weak. Germany shows higher social tolerance even if legalisation of adult homosexuality has been recent, but the main reason for late introduction is the very strong family lobby of the German Catholics, supported by the right-wing CDU protestants. German family still is very traditional and German politics do not protect extramarital births and unions until now (Peuckert 2008). It may be one of the reasons why such an important part of the population stays away from giving birth and getting married. The "alternatives" are numerous and very creative in new developing new lifestyles, but they definitely are a minority more or less ignored by the majority in power (Bochow 1993). Same sex unions tend to identify with that part of the population (Banens and Mendès-Leite 2008). This may explain part of the very low registration levels.

The other countries of this second wave are the Netherlands, Belgium and France. They are of a very different type. Their registered union, whether marriage or partnership or "solidarity pact" or "cohabitation contract" all are universal. In France, the universality of the contract has thought to be strategic: it would have hidden the same sex part of it throughout the political debate (Borrillo and Lascoumes 2002). A more general view over the twelve European countries suggests another explanation: all countries that legalised adult homosexuality at the beginning of the nineteenth century, by inventing or accepting the Code Napoleon, have set up a universal type of same sex union registration one and a half century later. The Code Napoleon expressed moral neutrality in sexual affairs as it did in religious affairs. It did not protect homosexuality, nor did it abolish homosexuality as an element

susceptible to intervene in questions of public order, but it did define a private sphere of free sexual activity. A sphere of state neutrality. The legal principle it relies on is the principle of liberty. It has been a major step in the definition of sexual rights and none of the "Code Napoleon" countries has ever come back on this principle. Not even Franco's Spain, where the Vagabond Act of 1954 penalised public acts supposedly related to homosexuality but ignored private adult homosexuality.

Legal visibility or disregard are at the heart of the universal-separation question. It was so for the legalisation of adult homosexuality and it has been again for the recognition of same sex unions. Borrillo and Lascoumes are right when they suppose the French choice for a universal contract had to do with invisibility. But they are wrong when they suggest it was so for politically strategic reasons. The legal invisibility of private sexuality is a political achievement and is socially supported in the universal-type countries. The question had been settled in the Netherlands first. Their arguments had no French inspiration and did not call upon any public opinion strategy (Waldijk 2001). The new partnership (1998) and the open marriage (2001) were made-up with the concern to remain as neutral as possible towards the sexual activity of the union that should remain invisible. In the Netherlands, as in all "universal" countries, universality was a self-evidence like separation was in "separation" countries. In France, one voice defended separated legislation, the sociologist Irène Théry. She has been considered, for that reason, as an anti-legislation activist. The same thing happened the other way around to Peter Tatchell, Celia Kitzinger and Sue Wilkinson, who defended the universalist legislation in England. It showed that the universalist-separatist division, related to question of visibility, is sociologically and historically rooted.

The recognition of same sex unions in separate-type countries is not based on the principle of liberty but of equality (Jacot 2008). Visibility is its condition. That may be the reason why all separate-type countries legalised adult homosexuality so late, generally after WO II. Homosexuality first had to be recognised as an invariable personal characteristic. Recognition came in the first half of the 20th century. Equal rights had to wait till the end of the century, and even while recognising homosexuals as a group in society, equal in rights, separate-type countries more or less appreciate their difference. We may see these differences in the very contrasting levels of registration between the separate-type societies, ranging from very low in Sweden and Germany to very high in the UK.

The second wave universal countries start registration levels much higher than the Scandinavian countries or Germany, at a mean base level of 8.7 for 100 000 (for France: Carrasco 2007, Belgium only marriage figures). And yet, they don't show a Scandinavian type of individual-based nuptiality. Dutch and Belgian marriage and family behaviour is rather traditional with relatively low births

outside marriage and women labour participation (Wouters 2005). French marriage and family behaviour is more individual-based, but social acceptance of same sex unions seems rather low. As Festy noted already in 2001, universal second wave countries end up with comparable registration figures but their motives may be quite different.

THIRD WAVE : THE PERIPHERIES OF CONTINENTAL WESTERN EUROPE

The second wave was less homogeneous than the first one, opposing two groups of countries. The third wave has no more homogeneity at all. Spreading East (Switzerland), South (Spain) and West (UK), the three countries do not have much in common except for their relatively high registration frequency. The base level is 7.8 in Spain, 11.8 in the UK and 9.5 in Switzerland (for estimates, see appendix). The mean base level for wave three is then 9.7 for 100 000, which is close to three times the first wave mean base level. None of the three countries seemed promised to high registration levels.

The UK certainly shows a rather individual-based marriage and family behaviour, but social acceptance of homosexuality is low compared to the rest of the sample. The UK is a typical separate-type country. Adult homosexuality has been legalised very late, in 1967. Since then, LGBT rights have been thought of in terms of civil rights and gay citizenship, on the principle of equality. Not on the basis of state neutrality and invisibility. Very high registration levels may be seen, then, as acts of visibility. Unlike Sweden or Germany, UK gay and lesbian couples give expression to a need of declaration. It may be addressed to the community and to society more than to the family of origin or to each other. Low social acceptance may play a role. As we saw for Sweden, where high social acceptance seemed to make partnership registration superfluous, in the UK low social acceptance could make partnership registration popular.

Spain is a universal-type country. It surprised Europe by opening up marriage so soon after the Netherlands and Belgium. Yet, Spain had a long history of legalised adult homosexuality and social acceptance is rather high, much higher than in the UK. On the other hand, family is very traditional. As we noted in the case of the Netherlands and Belgium, traditional family practices and values do not necessarily oppose social acceptance of homosexuality, if it is in a universal-type context, based on invisibility and state neutrality.

Switzerland is a case apart. It has known a universal-type registration type in the Geneva canton from 2001 on, but the Swiss-German cantons, especially Zurich, opposed it and imposed a separate-type registration all over the Swiss federation. Yet, the first Swiss registration levels are much higher than the German

ones. Zurich might benefit of a strong gay attraction, it is supposed to be one of the major Germanic gay capitals appealing to more than Swiss gays. In that case, the high Swiss registration level could partly come from a more than national-based community. Two indicators go that way. First, the very low lesbian-gay rate of registrations. German and Austrian gays may be more attracted than lesbians, this could contribute to the low lesbian-gay registration rate. The second indicator comes from canton statistics. Geneva and Zurich being the two major cantons, we are surprised by the similarity of the registration rate. In 2007, Zurich was just a bit ahead, in 2008, Geneva took the first place. This could mean two things: either Zurich is not the Swiss gay capital and both cantons would have the same high registration behaviour. In that case, Zurich's reputation is based on more visibility only. Or, Zurich does have a comparatively bigger gay community and in that case its registration level is lower than the Geneva level. It might even come close to the low German level.

Another explanation of the registration contrasts might come from time itself. Social acceptance of same sex union registration may have increased since the early nineties. The mean registration rate in 2007 was 6.0 for the first wave, 8.8 for the second wave. This is much closer to the 9.7 base level of the third wave. A final answer will have to wait till all countries will have finished the increase phase of the registration level.

CONCLUSION

A table might resume the main results of the monographic comparison. (To be continued)

Table 2. Same sex union registration according to extramarital births and social acceptance of same sex marriage

	High social acceptance of same sex marriage	Low social acceptance of same sex marriage
High part of extramarital births	DK – medium NOR – low SW – low	FR – medium UK – high
Low part of extramarital births	NL – high BE – high SP – medium	GER – low FIN – low CH – high

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APPENDIX

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