'A MATTER OF JUSTICE AND NECESSITY'

Women's Participation in the Catholic Church.¹

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Abstract.

This article expands on a statement made by John Paul II on the necessity for 'real equality' for women. It begins by elaborating on two aspects of this statement that with regard to women, 'history has conditioned us,' and 'the Gospel contains an ever relevant message.' The article examines some sayings about women in the tradition, and argues that the tradition has been shaped by Aristotelian philosophy rather than the Scriptures. Finally it notes some contemporary thinking with regard to opening the diaconate to women.

Introduction.

On the eve of the 1995 Beijing Women's Conference John Paul II stated:

We are heirs to a history which has *conditioned* us to a remarkable extent. Women's dignity has often been unacknowledged and their prerogatives misrepresented; they have often been relegated to the margins of society and even reduced to servitude. This has prevented women from truly being themselves and it has resulted in a spiritual impoverishment of humanity.

If objective blame, especially in particular historical contexts, has belonged to not just a few members of the Church, for this I am truly sorry. May this regret be transformed, on the part of the whole Church, into a renewed commitment of fidelity to the Gospel vision. When it comes to setting women free from every kind of exploitation and domination, the gospel contains an ever relevant message which goes back to the attitude of Jesus Christ himself.

As far as personal rights are concerned, there is an urgent need to achieve *real equality* in every area... this is a matter of justice but also of necessity (para 3 & 4).²

There have been many statements made about women and their participation in the Catholic Church, but this one of John Paul II has received very little attention and yet it has the potential to be profoundly liberating. His letter notes that historically the Church has been conditioned in its consideration of women, and that this uncritical conditioning has resulted in the marginalisation and servitude of women as well as the impoverishment of the whole global society. He then, on behalf of the Church offers an apology and continues by speaking of a desire for the transformation of the entire Church to achieve the liberating vision of the Gospel. Finally he names the urgency of this transformation, to achieve real equality in every area, 'as a matter of justice and necessity.' His words, spoken sixteen years ago, continue to provide a prophetic challenge to the contemporary Church, but more than rhetoric is needed.

A 'History has conditioned us.'

i. Attitudes towards women in Church history.

The opening statement by John Paul II began: We are heirs to a history which has *conditioned* us to a remarkable extent. The fol-

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lowing excerpts from Church history provide evidence of how deeply conditioned the Christian Church has been when it comes to women. Tertullian (160-230):

Do you know that each of your women is an Eve? The sentence of God on this sex of yours lives in this age; the guilt must necessarily live too. You are the Devil's gateway; you are the unsealer of that tree; you are the first deserter of the divine law. (*The Dress of Women 1.1.2*)

St. Ambrose (375):

We know that Adam did not sin before the woman was created; indeed, after woman was made, she was the first to violate the divine command. She even dragged her husband along with her into sin and showed herself to be an incentive to him. (*On Paradise*, 10, 47)

St. John Chrysostom (345-407):

A wife has just one purpose: to guard the possessions we have accumulated...God maintained the order of each sex by dividing the business of human life into two parts and assigned the more necessary and beneficial aspects to the man and the less important, inferior matters to the woman. (*The kind of women who ought to be taken as wives*, 4).

St. Augustine

I cannot think of any reason for woman's being made as man's helper, if we dismiss the reason of procreation. (*Literal Commentary on Gen*esis 9:5)

Martin Luther:

He rules the home and the state, wages war, defends his possessions, tills the soil, plants etc. The wife on the other hand, is like a nail driven into the wall. She sits at home. (*Commentary* on 1 Tim 3:16).

In the light of such patronising and misogynistic statements it is a relief to read the words of John Paul I: 'God is Father, but especially God is Mother';³ and the words of John Paul II stated at the beginning of this article. But, while the rhetoric of justice for women in gradually creeping into the tradition, this is not yet being met with action in terms of significant changes to Canon law and Church order.



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ii. The source of history's conditioning.

Far too often the Scriptures are blamed for the discrimination against women, prevalent in so much of our heritage. Certainly, the Scriptures, particularly the Old Testament, reflect a patriarchal society, but the tradition's misogynistic attitude has its basis not in the bible but in Greek philosophy.

Aristotle (384-322 B.C.E.)

And a woman is as it were an infertile male; the female, in fact, is female on account of an inability of a sort... The male provides the 'form' and the 'principle of movement,' the female provides the body, in other words, the material... ('*On the genesis of the creatures*,' bk. 1, chap. 20)

Aristotle's understanding of the human person and society continued into the Roman world in which Christianity began and developed. Such philosophical thinking about gender differences is based on a false understanding about the process of human conception. In ancient times it was believed that only the male was active in the generation of human life. The woman was a passive recipient of the male seed and the carrier of life, but she contributed nothing to life's origin.

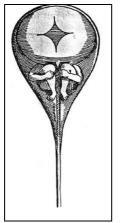
If, then, the male stands for the effective and active, and the female, considered as female, for the passive, it follows that what the female would contribute to the semen of the male would not be semen but material for the semen to work upon. (Aristotle. *De Generatione animalium.)*

From this wrong 'biology' came an understanding that women were deficient and that only the male was the true and complete sex, females were a deviation. Thinking that women were physically deficient and inferior may have been a factor in treating women as socially and politically inferior.

I want to stress that this attitude towards women does not come from biblical teaching but from the philosophy of Aristotle which has its basis in ignorance about human biology. But as the early Church developed within this Greco-Roman world, Greek philosophy became the milieu for Christian theological thinking.⁴ Aristotle's view about the inferiority of women is reflected in Patristic writings and the theology of Thomas Aquinas who wrote:

In the higher animals, brought into being through coitus, the active power resides in the male's semen, as Aristotle says, while the material of the foetus is provided by the female.' (*Summa Theologica* 1a. 118, 1 ad 4).

These philosophic considerations work out of a dualistic perception of the human being understood as matter and spirit, with the woman always identified with the material and the man identified with what was considered the higher faculty of rationality and spirit.⁵



The entire human person is within the sperm. Women have no role in the act of procreation.

This understanding of human conception, which had its origins four hundred years before Christ, continued throughout most of our Christian tradition. So certain were scientists about the male being the sole source of life, that even when microscopes began to be used male prejudice saw in semen miniature human beings, complete with arms and legs. As late as the 19th century, the view persisted that only the male contributed to the creation of a human life, with the woman providing the womb receptacle to incubate and nourish this life. (See figure.)

It was not until 1827 that Karl Ernst Von Baer identified and described the female ovum using a microscope.⁷ The discovery, that woman also was an active participant in human procreation, has had profound affects on the understanding of the human person and also of human society. Following Von Baer's work, no longer could a woman be considered an inferior biological specimen of the human race. But this is a very late discovery—1827. In the 1800's we knew more about electricity and the solar system than we did about human life.

What I want to insist on here is that the perception of women's natural inferiority to men emerged from Greek natural philosophy and was based on false biological knowledge. But this is the philosophic milieu taken for granted throughout most of Christianity and therefore this necessarily is the prevailing world view that informs and shapes Christian theology, and that influences biblical translations, Church architecture, rituals and canon law.

iii 'The Gospel contains an ever relevant message.'

By contrast, the New Testament on the whole proposes a positive portrayal of woman and sexuality.⁸

Women were included in the discipleship group of followers of Jesus (Mark 15:40-41; Matt 27:55-56). Women were the first to receive the Easter proclamation, and in the Gospel of John, Mary Magdalene is the first to experience an appearance of the Risen Jesus and commissioned to proclaim the Easter message to 'my brothers and sisters' (John 20:17). For this she has been given the title in the Church, *Apostle to the Apostles*.⁹

Women were not included in the list of 'the Twelve' as these were the foundation group, modelled on the twelve patriarchs who were the foundation of Israel; this group did not continue beyond the foundation time. In the New Testament world, women were leaders of House Churches (Nympha, Col 4:15; Apphia, Philemon 1:2; Mary, Acts 12:12); a woman named Lydia was the first European convert, and her home provided the first welcome to Paul and his Gospel (Acts 16:14-15). Women were prophets (Acts 21:9), they prayed and prophesied in community liturgies (1Cor 11:5) and Priscilla was a travelling missionary like Paul (Acts 18:2, 19; 1Cor 16:18; 2Tim 4:19; Rom 16:3). Paul names Phoebe, 'deacon' and 'leader' of the Church in Cenchreae (Rom 16:1-2),¹⁰ and commends Junia, calling her 'outstanding among the Apostles' (Rom 16:7). These New Testament writings give evidence of the active participation of women in the community.

In the New Testament communities the titles used to describe leadership were elders (presbyteroi), overseers (episkopoi) and stewards or administrators (*diakonoi*);¹¹ none of these roles is linked to the Eucharist in New Testament times. In the New Testament there seems to be little distinction made between these titles and it is not until the next century that these developed a hierarchical structure. The term 'priest' (hiereus) is never used to describe a Christian ministry in the New Testament, nor is there any ritual called an 'ordination'. Here we need to be aware that the term priest (*hiereus*) in both Judaism and pagan religions meant an official linked to the sacrifice of an animal in a Temple. Within the New Testament the primary description of worship was the 'Lord's Supper' and this was a meal celebrated within a house, and there is no indication who presided over this meal-it may have been the owner of the house, or a travelling missionary, or an apostle if one was present.¹² The first time there is any mention of who led the Eucharist occurs in the Didache (ca. 100) and in this text the presider is called a 'prophet.' 'But permit the prophets to offer thanksgiving as much as they desire' (*Did.* 10:7). 'Every first fruit then of the produce of the wine-vat and of the threshing-floor, of thy oxen and of thy sheep, thou shalt take and give as the first fruit to the prophets; for they are your chief-priests' (*Did.* 13:3). Within the New Testament, named women held all of these roles: prophet, householder, travelling missionary, apostle.

An investigation into the New Testament and the possibility of women's priesthood was conducted by the Pontifical Biblical Commission from July 1976 through January 1977. When the Biblical Commission studied all the relevant information, some of which I have briefly noted above, their conclusion was that the New Testament alone was inconclusive on whether women could or could not be ordained priests.13 This was a unanimous decision (17-0).¹⁴ The seventeen members of this Commission were all priests appointed by the Pope in view of their outstanding biblical scholarship. Their findings are very significant when we consider that the Church looks to Scripture and Tradition as the two sources of Revelation. In 1977, the verdict was that Scripture alone could not determine an answer to the question of women's ordination.

iv Women in the Tradition.

If the Scriptures are unable to provide a conclusive answer, an examination of Church Tradition may bring greater certainty. It has become commonplace to hear phrases such as 'women have never been ordained', or 'women have never been priests'. A study of historical documents and epigraphs provides evidence that such statements are wrong. As I will demonstrate, in the early centuries women were 'ordained', they were consider part of 'clerical orders', they were called 'presbytera,' 'diakonos', and .diakonissa' and two that we know about were given the title 'episcope'. While noting these terms, it is also important to recognise that at present there is no certainty what roles these women had in relation to sacramental ministries.

It is only when we move beyond the New Testament that words, which today are associated with hierarchy and priesthood, have their origins. Tertullian (155-220) was the first to use the terms cleric or clergy as distinct from the people, the *laos*, and he describes the clergy as an 'ordo'.15 Within Roman society there were different ranks that were known as an 'order' (ordo), e.g. the order of senators, or the order of equites. The process of being enrolled in an order was called 'ordination'.¹⁶ This pattern from the Roman political world had a strong influence on the Church. Widows and Virgins17 could be enrolled in an 'order' providing they met strict conditions of good works and also age;¹⁸ according to Theodore of Mopsuestia, a woman could only 'be received into the order of widows' if she were over sixty.¹⁹ This same author also asks, 'whether it was fitting that deaconesses be ordained before this age.' Widows had a role in receiving penitents who, according to Tertullian, were required 'to prostrate themselves before the widows and the presbyters' (De Puditicitia 17, 7). Tertullian also speaks of both women and men in 'ecclesiastical orders': 'How many men and how many women in ecclesiastical orders owe their position to the practice of continence.'20 In the Apostolic Constitutions (ca 400) there is a description and prayer for the ordination of a deaconess:

O bishop, you shall lay your hands upon her in the presence of the presbytery, and of the deacons and deaconesses, and shall say: O Eternal God, the Father of our Lord Jesus Christ, the Creator of man and of woman, who replenished with the Spirit Miriam, and Deborah, and Anna, and Huldah ... do Thou now also look down upon this Your servant, who is to be ordained to the office of a deaconess, and grant her Your Holy Spirit ... that she may worthily discharge the work which is committed to her. (Book VIII, 19-20)

The Council of Chalcedon (451) determined: 'A woman shall not receive the laying on of hands (*cheirotoneisthai*) as a deaconess under forty years of age, and then only after searching examination' (Canon 15).²¹ The age of forty for a deaconess continues in the Justinian legislation (ca 530) where deaconesses are listed among the clergy and like other clerics deaconesses receive an ordination by the 'laying on of hands,' they were attached to a Church and were supported by the Church.²² In addition to widows, virgins and women deacons, an Abbess was also 'ordained' in a ritual laying on of hands.²³ As head of her community, the Abbess heard confession, absolved from sin, gave penances and reconciled members back into the community. As part of her ordination ritual a religious mitre was placed on her head and she received from the bishop a staff as a sign of office. The Cistercian Abbess of Las Huelgas, (founded in Spain in 1187) as well as wearing the mitre and carrying the crozier of a bishop, also exercised Episcopal authority by appointing and dismissing parish priests, she issued faculties to hear confessions, to preach and celebrate Eucharist, and carried out other duties of ecclesiastical jurisdiction. Her powers of jurisdiction came to an end by Papal edict as late as 1873.24

There are several books now available that provide primary sources listing inscriptions from tombs and other monuments where women are named with the title deacon, and deaconess.25 Madigan and Osiek list sixty-one such inscriptions in the East and four in the West covering the first six centuries. These books also include evidence for women given the title presbytera/presbyteressa, (a total of 10) and there are two women who have the title *episcopa*. One woman, whose name is uncertain, was buried in the Basilica of St Paul's in Rome. Her inscription reads: 'Here lies the venerable woman, bishop (episcopa) Q, buried in peace for five [years] + Olybrio.²⁶ Also in a Church in Rome, there is a mosaic showing a group portrait of four women.²⁷ On the far left, one is named, 'Theodora Episcopa'.

The above sampling of the traditions regarding the ordination of women has not been widely known, because history has given little attention to women's experience. But as more and more evidence from history comes to light there can be no doubt that for centuries within the Catholic tradition, in a variety of jurisdictions, women received ordination to different roles, women were considered as clerics, women bore titles that today we would associate with deacons, priests and bishops, and in some of these roles women exercised ecclesiastical and sacramental authority.

While there has been a ruling on the nonordination of women to the priesthood in the Catholic Church,²⁸ the witness of Scripture (Phoebe) and tradition provides a precedent for considering the ordination of women to the diaconate.²⁹ In 2002, under the presidency of Cardinal Joseph Ratzinger the International Theological Commission recognised the role of women deacons in the early Church but hesitated to equate their function during the first sixth centuries with the function of deacons today.³⁰ If the diaconate were open to women, apart from wider pastoral opportunities, this would enable women to participate in Church governance, which Canon Law at present restricts to male clerics (Canon 129 #1).

D A Matter of Justice and Necessity

I have developed this point at length as there is still much ignorance about women's roles in the Church in earlier centuries. There are other issues that could also be examined if the Church were to take seriously the words of John Paul II when writing to the gathering of women in Beijing: 'there is an urgent need to achieve *real equality* in every area... this is a matter of justice but also of necessity.'

As a matter of justice and necessity, English translations of our liturgical readings and prayers should include and name women, instead of maintaining the archaic use of 'man' as a generic term. In many cases, the use of the term 'man' is an inaccurate translation from the original language, since Hebrew, Greek and Latin have different terms for an individual male and for a general collection of people. An accurate and literal translation should make this distinction in English. As a matter of justice and necessity women should be well represented at all levels in diocesan, national and international committees, commissions and consultations regarding Church matters. We also have been baptized into Christ and share in his royal, priestly, and prophetic character.³¹

As a matter of justice and necessity women should have equal access to financial support in their theological studies instead of only financing the theological education of a few male seminarians.

As a matter of justice and necessity women should have equal access to diocesan support for their discernment of vocation and pastoral formation for ministry.

The list could continue.

Conclusion.

I began this article by quoting parts from a letter addressed to women by John Paul 11. In this letter I noted his awareness of the conditioning power of history and the need today for transformation by 'a renewed commitment of fidelity to the Gospel vision.' He called the need for real equality in every area 'a matter of justice and necessity.' These words I believe provide a prophetic challenge to the contemporary Church. This article has argued that both the Scriptures and Tradition testify that women in the past were ordained into various ministries. Specifically, there is no theological barrier to the ordination of women to the diaconate and this would be one step towards achieving the justice that is essential if we are to be a Gospel community. The Church cannot preach justice with prophetic integrity so long as justice is compromised within its own institutional structures.

The liberating God of the Exodus, who hears the cries of all who are oppressed, laments with us and over us, and over our institution for the centuries of neglect, ignorance and prejudice that have been part of women's experience within the Church that we too would like to call our home. 1 This article is an abridged version of an address given in Brisbane (3/9/2010) to celebrate the 25th anniversary of the establishment of the Catholic Justice and Peace Commission in the Archdiocese of Brisbane, Australia.

2 John Paul II, 'Letter of Pope John Paul II to Women,' Libreria Editrice Vaticana, http:// www.vatican.va/holy_father/john_paul_ii/letters/ d o c u m e n t s / h f _ j p ii_let_29061995_women_en.html.

3 10th September, 1978. This text can be found in *La Documentation Catholique*, vol 75. 60th year (24 September, 1978) 17:836.

4 See the discussion on the development of sexual identity and sex-polarity based on Aristotelian thought in Prudence Allen, *The Concept of Woman: The Aristotelian Revolution*, 750 B.C. - A.D. 1250 (Grand Rapids: Eerdmans, 1985).

5 The neo-platonic philosopher Plotinus (C.E. 205-270) was the first philosopher to emphasize the connection of matter with evil. He wrote, 'When something is absolutely deficient—and this is matter—this is essential evil without any share of good.' Plotinus, *Enneads* in *Plotinus* (Cambridge: Harvard University Press, 1966), Vol. III, 256. Since women were associated with materiality, under the influence of neo-platonism, women became related to evil. See Allen, *The Concept of Woman*, Plotinus citation on p. 203.

6 This information is taken from Norman Ford, When Did I Begin? Conception of the Human Individual in History, Philosophy and Science (Cambridge: Cambridge University Press, 1988), 49.

7 Ford, *When Did I Begin*? 48. In the 13th century anatomists at the University of Bologna had discovered the female ovaries, but this discovery did not lead to changing the Aristotelian view that only the male seed was active in the generation of life; Allen, *The Concept of Woman*, 432.

8 It is beyond the scope of this article to critically appraise the few New Testament passages that present women within a traditional Greco-roman social ethic such as that found in the Household Codes (1Tim 2:8-15; Eph 5:22-6:9 par. Col 3:18-4:1) and 1Cor 14:34-36 which most Pauline scholars consider to be an interpolation under the influence of the Household Codes. For a critical discussion of the role of these Household Codes in the later decades of the first century see Margaret Y. MacDonald, *The Pauline Churches: A Socio-Historical Study of Institutionalization in the Pauline and Deutero-Pauline Writings* SNTSMS 60 (Cambridge: Cambridge University Press, 1988).

9 This title, which became quite common in the twelfth century, appears to date back to Hippolytus, bishop of Rome (c. 170-235) in his Commentary on the *Canticle of Canticles*. On the title in the twelfth century see, Jane Schaberg, *The Resurrection of Mary Magdalene: Legends, Apocrypha, and the Christian Tradition* (New York: Continuum, 2002), 88.

10 A number of church Fathers comment on Phoebe and have no difficulty with Paul naming a woman as a 'deacon'. See for example, John Chrysostom, Homily 30 on Rom 16:1-2. This text is cited in Kevin Madigan and Carolyn Osiek eds., Ordained Women in the Early Church: A Documentary History (Baltimore: John Hopkins University Press, 2005), 15. John Chrysostom speaks of women 'who hold the rank of deacon.' (Homily 11 on Timothy 3:11; cited *ibid*. 19. Similarly, Theodoret Bishop of Cyrrhus, (Commentary on 1 Timothy 3:11; cited *ibid*. 19). Phoebe is called diakonos and prostasis and these words are frequently mistranslated. The term prostasis when used to describe the role of an episkopos (1Tim 3:4) and presbyter (1Tim 5:17) is translated as 'rule', but when used of Phoebe is frequently translated as 'helper' or 'patron'.

11 H. W. Beyer, 'Diakónos,' in *Theological Dictionary of the New Testament: Abridged in One Volume*, ed. Geoffrey W. Bromiley (Grand Rapids: Eerdmans, 1985), 155.

12 In Acts 20:11. Paul breaks bread, but this may simply be an expression for taking food and is not necessarily a Eucharist.

13 Pontifical Biblical Commission, 'Can Women Be Priests?' *Origins* 4, July (1976): 92-96.

14 A copy of the Pontifical Biblical Commission's Document and a discussion of this document and 'The Declaration on the Question of the Admission of Women to the Ministerial Priesthood,' can be found in John R. Donohue, 'A Tale of Two Documents,' in *Women Priests: A Catholic Commentary on the Vatican Declaration*, ed. Leonard Swidler and Arlene Swidler (New York: Paulist, 1977); the voting numbers are on pg. 25.

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15 Tertullian, (*De idol.*, c. viii); Kenan Osborne, *Priesthood: A History of Ordained Ministry in the Roman Catholic Church* (Mahwah, N.J.: Paulist, 1988), 115.

16 The first ritual of ordination is found in *The Apostolic Tradition* of Hippolytus, dated around 215. See Osborne, *Priesthood*, 117.

17 'Virgins' were sometimes called 'Widows,' and this may have been because they performed the same duties and professed continence. 'Greetings to the families of my brothers, along with their wives and children, and to the virgins called widows' (Ignatius of Antioch, *Ep. to Smyrneans* 13:1. See Roger Gryson, *The Ministry of Women in the Early Church* (Collegeville: Order of St Benedict, 1976), 13-14, 21-22.

18 Gryson, *The Ministry of Women in the Early Church*, 20-21.

19 Theodore of Mopsuestia, Commentary on 1 Tim 5:9. See Madigan and Osiek, *Ordained Women in the Early Church*, 22.

20 Tertullian, De exhortatione castitatis 13, 4.

21 Ute E. Eisen, *Women Officeholders in Early Christianity: Epigraphical and Literary Studies* (Collegeville: Liturgical Press, 2000), 151.

22 Gryson, The Ministry of Women in the Early Church, 71-73.

23 A description of these rituals is given in Gary Macy, *The Hidden History of Women's Ordination: Female Clergy in the Medieval West* (New York: Oxford University Press, 2008), 81. Macy provides an Ordination rite for an Abbess from the Early Middle Ages in Appendix 2 and a 10th century ordination ritual for a deaconess in Appendix 1. For a discussion of these rituals see *ibid.* pp. 70-73.

24 Papal Bull *Quae Diversa*. Pope Pius IX. See, Gary Macy, 'Bishops by Any Other Name,' *The Tablet*, 9th August 2008. George Tavard, *The Church, Community of Salvation: An Ecumenical Ecclesiology*, New Theology Studies 1 (Collegeville: Liturgical Press, 1992), 125.

25 See especially Madigan and Osiek, Ordained

Women in the Early Church and Eisen, Women Officeholders in Early Christianity

26 Madigan and Osiek, Ordained Women in the Early Church, 193; also Eisen, Women Officeholders in Early Christianity, 199.

27 Church of Praxedis

28 Inter Insigniores, (1976) and Ordinatio Sacerdotalis (1994).

29 The issue of women deacons was not addressed by the declaration *Inter Insigniores*. The commentary on this declaration noted that this 'is a question that must be taken up fully by direct study of the texts, without preconceived ideas,' and 'that it should be kept for the future.' See, *From 'Inter Insigniores' to 'Ordinatio Sacerdotalis': Documents and Commentaries*, (Washington D.C.: United States Catholic [Bishops'] Conference, 1996) 61.

Among those who have expressed support for the ordination of women to the diaconate are Cardinal Basil Hume, Cardinal Carlo Maria Martini, and Bishop Roger J. Vangheluwe of Bruges. See Phyllis Zagano, 'The Question of Governance and Ministry for Women', *Theological Studies* 68 (2007): 358

30 See International Theological Commission, 'Le Diaconat: Evolution Et Perspectives," (2002),http://www.vatican.va/roman curia/congregations/cfaith/cti documents/ rc con cfaith pro 05072004 diaconate fr.html. This issue has ecumenical implications since the Catholic Church recognizes the validity of sacraments and orders in some Churches which do ordain women deacons. On the ecumenical aspects of women deacons see Phyllis Zagano, 'Catholic Women's Ordination: The Ecumenical Implications of Women Deacons in the Armenian Apostolic Church, the Orthodox Church of Greece, and the Union of Utrecht Old Catholic Churches', Journal of Ecumenical Studies 43 (2008).

31 Vatican II, Dogmatic Constitution on the Church, para. 31.

Readers may wish to revisit *Compass* (Vol. 34, no. 1—Autumn 2000) for reflections on and responses to *Woman and Man. One in Christ Jesus* (1999), the report on the research project on the participation of women in the Catholic Church in Australia commissioned by the Australian Bishops Conference and undertaken by the Bishops' Committee for Justice, Development and Peace, the Australian Catholic University and the Australian Conference of Leaders of Religious Institutes.

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