

Gender, National Identity and Citizenship: Reflections on the Middle East and North Africa

Valentine M. Moghadam

Introduction

Feminist scholarship — and the women's movement — has contributed much to our understanding of the gendered nature of nationalism, national identity-formation, and citizenship. Scholarship and struggles alike have drawn attention to the incomplete nature of such political projects as liberal democracy, social democracy, and socialism; to the differential gender outcomes of revolutionary movements and nation-state construction; and to the implicit or explicit second-class citizenship of women (e.g., Applewhite and Levy, 1990; Krups, Rapp, and Young, 1989; Reynolds, 1987). Reviewing the rise of Western capitalism and modernity through the lens of gender, we see that the definition and organization of the public sphere and the private sphere, so central to both projects, were infused with formal and informal rules pertaining to gender (and to class). For Pateman (1988:x), "the social contract presupposed the sexual contract, and civil freedom presupposed patriarchal right". Moreover, modern civil society "is constituted through the 'original' separation and opposition between the modern, public-civil world and the modern, private or conjugal familial sphere" (Pateman, 1988:102). In this reading, the concepts of citizen and civil society are masculine (Kandiyoti, 1997: 9). Certainly the differential and unequal political and civil rights given to men and to women would confirm this reading, along with the fact that women were long excluded from the collective "we" of the body politic (Yuval-Davis, 1997:47). Not until the early 20th century, when the right of universal suffrage was institutionalized in Western countries and women's movements emerged and spread, did citizenship begin to assume a more inclusive frame of reference. As second-wave feminism spread in the second half of the 20th century, women's citizenship rights in Western countries were politicized and further elaborated through demands for full civil rights (particularly with respect to reproductive rights and rights within the family), political rights (including calls for greater participation through political-party quotas), and social rights (greater economic security and entitlements demanded of the welfare state).

In Africa and Asia, the modern projects of national in-

dependence, state-building, and economic development have had distinctive gender implications and outcomes. Earlier in this century, nationalist ideologies sometimes offered a window of political opportunity for the advancement of women and their incorporation into the national project. Indeed, in the early 20th century, nationalism and feminism were compatible, shared the same objectives, and were allied. Many national leaders of the colonial world embraced nationalism and socialism as paths to modernity. Jayawardena (1986) has documented the parallel movements for national liberation or identity-formation and for women's emancipation in south, east, and west Asia.¹ During the period of decolonization, political rights, including voting rights, were granted to women and men alike. More recently, however, some nationalist projects and most fundamentalist movements have drawn on and reinforced concepts of male-female differences. They have constructed men as breadwinners and economic providers, and women as housewives and mothers who are the symbols of culture and tradition and the carriers of the collective "honor." The movements or the new states have formulated rights and obligations in ways that strengthen the masculinity of the public sphere and the femininity of the private sphere. In so doing, their policies and discourses ironically and unintentionally recall the early Western model of exclusivity and male privilege.

At the same time, women's struggles in various parts of the "modernizing" world for equality, autonomy, and empowerment — struggles that originated in the early 20th century but have taken a global and more ambitious turn in the late 20th century — have been directed at laws, policies, and cultural understandings that exclude women or privilege men. Women's social movements in Africa, Asia, and Latin America have sought the elaboration or extension of civil, political, and social rights for women.² These have taken place often in a national context often far less congenial than that in the early part of the century, but in a new global context that provides opportunities, support, and legitimation for the advancement of women. At the same time, women's social movements and non-governmental organizations operating across national boundaries are help-

ing to create a “global civil society” and concepts of “global citizenship” (Smith, Chatfield, and Pagnucco, 1997; Lister, 1997).

In brief, nationalism, identity and citizenship have reflected the social relationships of gender (as well as class and ethnicity), while women’s activism at the national and global levels has sought changes in the structure of those social relationships and in the meaning of citizenship.

Whereas the literature on citizenship — including gender and citizenship — has emerged mainly in connection with developments in Europe, the “Third World” has figured prominently in the scholarship on nationalism and revolution. Another body of literature, on fundamentalism — including fundamentalism and women’s rights — has emerged mainly in connection with the Middle East and North Africa (MENA). In the 1990s, however, scholars began to turn their attention to issues of civil society (Kandil, 1995; *Middle East Journal*, 1993). This new attention is due partly to the perceived failures of nationalism and socialism and partly to international pressures, but it also reflects real developments “on the ground.” With moves towards political and economic liberalization since the late 1980s, non-governmental organizations and human rights organizations have spread throughout the MENA region. For example, in Egypt, sociology professor Saad eddin Ibrahim publishes the magazine *Civil Society*, that is dedicated to promoting democratization and human rights. Among Iranian expatriates, as well as liberals within Iran, discussions of *jameh-e madani* (civil society) dominate many conferences and seminars.

The issue of women’s rights lies at the heart of each of these issues, and at the intersection of them all. In many ways, the Middle East and North Africa offers a particularly rich terrain for exploration of the ways in which national-identity formation and citizenship intersect, are gendered, contested, and subject to change. In this paper, gender refers to a structural relationship of inequality between women and men based on perceived sex differences, which is manifested in the economy, the polity, and in cultural production.³ National identity-formation is the process of construction of shared meanings regarding the nation-state, the national culture and heritage, and members of the community. In this process, notions of the Ideal Society are often linked to notions of the Ideal Woman (Papanek, 1994). Citizenship refers to a legal status as well as to a practice. I adopt T. H. Marshall’s definition of citizenship as “full membership in the national community,” encompassing civil, political, and social rights and responsibilities (Marshall, 1952). Feminists have pointed out that citizenship, certainly for women, concerns social standing, political participation, and national membership (Narayan, 1997). Empirically, women’s citizenship is reflected in their legal status, in access to employment and income, in the extent of their participation in formal politics, and in the formation of women’s organizations.

Much has been written about the problematical nature of women’s citizenship rights in Middle Eastern societies. It results partly from the absence or underdevelopment of democratic institutions in the region. But it is a function of

the discrepancy between constitutions that award equal rights to men and women and family laws derived from the Sharia (Islamic canon law) that undermine this equality. In other cases (e.g., Turkey and Tunisia), constitutional guarantees of equality are at odds with civil codes that define women as wards of men and their families. And in a few Arab Gulf countries — Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, and the United Arab Emirates — women have yet to receive political rights. Women’s second-class citizenship has long been institutionalized, but as this paper will show, it is being challenged by women’s organizations throughout the region. In general, they are challenging women’s location in the private domain and men’s control of the public domain. In particular, they are calling for the modernization of family laws, the criminalization of domestic violence, greater access to employment and participation in decision-making, and women’s right to retain their own nationality and to pass it on to their children. They are also pointing out that existing family laws are at odds with the universal standards of equality and nondiscrimination embodied in international instruments such as the Convention on the Elimination of All Forms of Discrimination Against Women. These gender-based demands for civil, political, and social rights would not only extend existing rights to women but also, and more profoundly, broaden the political agenda and redefine citizenship in the Middle East and North Africa. Lister (1997:35) has pointed out that “citizenship rights are not static but are always open to reinterpretation and renegotiation.” The veracity of this statement is vividly demonstrated by recent political processes in the Middle East, and by the demands of the women’s organizations.

The paper is organized in three parts. In the first part, we examine several instances of “national identity politics” and their implications for women and gender relations.⁴ In the second part, we highlight contemporary struggles around women’s citizenship in various countries. And in the third and final part, we reflect on the larger theoretical and political implications of the experiences in the Middle East and North Africa. These include the importance of a gender perspective in discussions of nationalism, identity, and citizenship, and the central role of “modernizing women” in the process of democratization and the construction of civil societies in the Middle East.⁵

National Identity Politics and Women

Current feminist scholarship on gender conceptualizes it as the social, cultural, and ideological construction of male and female roles, relations, and rights on the basis of perceived sex differences. Gender is also conceptualized as a system of social relations and ideologies that influences other social relations, institutions, and processes. Lorber (1994:1) defines gender as “an institution that establishes patterns of expectations for individuals, orders the social processes of everyday life, is built into the major social organizations of society, such as the economy, ideology, the family, and politics, and is also an entity in and of itself.” Yuval-Davis (1997) argues that the influence of gender relations may be seen in national reproduction (biological, social, symbolic), national culture and national citizenship,

and national conflicts and wars.

In an early formulation, Yuval-Davis and Anthias (1989) noted that women's roles in the biological reproduction of members of nations and ethnic groups, and the socialization of the young, impart upon them the assignment of transmitters of culture and signifiers of ethnic/national differences. This can be magnified during certain historical or social processes. Women may become the sign or marker of political goals and of cultural identity during processes of revolution and state-building, and when power is being contested or reproduced (Moghadam, 1997). Representations of women assume political significance, and certain images of women define and demarcate political groups, cultural projects, or ethnic communities. Women's behavior and appearance — and the range of their activities — come to be defined by, and frequently are subject to, the political or cultural objectives of movements, states, and leaderships (Moghadam, 1994b:2). For example, in the history of many Muslim countries, the unveiled modern woman has signified modernity, progress, and development, while the veiled domesticated woman has symbolized the search for authenticity, cultural revival, and reproduction of the group.

In my previous work, I have identified two types of revolutions, national-liberation movements, and state-building projects from a gender perspective: the emancipatory and the patriarchal (Moghadam, 1993, ch. 3; 1997). In the emancipatory model, national liberation and the emancipation of women are of a piece, and women's equality is equated with national development and progress. In the patriarchal model, all that is associated with the colonizer is rejected; religion, culture, and traditions are exalted; and the construction or restoration of the rights of men, or their empowerment, is predicated upon the domestication of women. In the first model, men and women are constructed as equal in rights and obligations. In the second model, men and women are constructed as different in their rights and obligations.⁶

Below we consider the cases of Turkey, Democratic Yemen, and Saur Revolutionary-period Afghanistan (exemplifying the emancipatory model), and the cases of Algeria and Iran (exemplifying the patriarchal model). As we shall see, discourses about national identity, as well as constructions of rights and obligations of men and women in constitutions, family codes, and labor laws, reflect and reinforce egalitarian or patriarchal understandings of gender.⁷

The Tanzimat Reforms and the Kemalist Revolution in Turkey

The wide-ranging reforms known as the Tanzimat (re-organization) began in 1839 under the rule of Abdul Majid and inaugurated Turkey's shift from a theocratic sultanate to a modern state. The security of the subject's life, honor, and property, and fair and public trials, were guaranteed, and a new penal code was formulated. The legal principle of equality of all persons of all religions was considered a bold move for the time (Lewis, 1965:105). The tax structure was reformed, and a new provincial administration based on the centralized French system was inaugurated. Primary and secondary state schools were established alongside religious schools and, in 1847, the creation of a Ministry of

Education effectively took away the clergy's power of sole jurisdiction over education. The reforms continued during the sultanate of Abdul Aziz and included the introduction of a new civil code in 1876 which, however, was based on the Sharia. In 1871 the American College for Girls was started, although for the first two decades it was restricted to Christians. The first Muslim girl to complete her studies there was Halide Edip, a future leader (Jayawardena 1986:29). But the trend had started, and many women educated in this manner were to make their mark as novelists and writers on women's emancipation.

Toward the end of the nineteenth century, opposition to the sultan was manifested in the Young Turks movement, officially called the Committee of Union and Progress. One of the principal tenets of the Young Turks was the need for modernization; they were also unabashedly for Westernization. Closely linked to the need for modernization through Westernization was the emancipation of women. Jayawardena reminds us that the process of Europeanization was not solely ideological: it also involved the forging of economic links with the capitalist countries of Europe. Around this time, the writer and sociologist Ziya Gokalp, who is often referred to as the theoretician of Turkish nationalism and who was strongly influenced by the Comtean and Durkheimian tradition in French sociology, advocated equality in marriage and divorce and succession rights for women (Abedan Unat, 1981:9).

World War I hastened the break-up of the Ottoman Empire and the emergence of a new group from among the Young Turks who advocated the building of a modern Turkish national state that was republican, secular, and non-imperialist. Mustafa Kemal, an army captain, set up a revolutionary government in Ankara in 1920; he then oversaw a peace treaty with the British and the establishment of the Turkish Republic in 1923, with himself as President as well as leader of the Republican Peoples Party. The Kemalist reforms were the most far-reaching in both intent and effect. Ataturk, as Kemal came to be known, furthered the process of Europeanization through economic development, separation of religion from state affairs, an attack on tradition, Latinization of the alphabet, promotion of European dress, adoption of the Western calendar, and the replacement of Islamic family law by a secular civil code. The influence of the French Enlightenment and anti-clericalism is clear in these reforms. By 1926 the *Sharia* was abolished, and the civil and penal codes were thoroughly secularized. While Gokalp urged the Turks to "Belong to the Turkish nation, the Muslim religion, and European civilization" (Keyder, 1979:9; see also Kandiyoti, 1989:141), Ataturk distanced himself from Islam.

Influenced by the legacy of the French Revolution and the European Enlightenment, Turkish reformers granted Turkish women the right to vote in 1934, many years before French women received the vote. Indeed, a central element of the conceptualization of Turkish nationalism, progress, and civilization was, as Gokalp put it, "Turkish feminism" (quoted in Kandiyoti, 1989:142). Not only Ataturk and Gokalp, but Kemalist feminists such as the nationalist fighter and writer Halide Edip, and Ataturk's adoptive daughter

Afet Inan, author of *The Emancipation of the Turkish Woman*, played major roles in creating images of the new Turkish woman. According to Kandiyoti, the new Turkish woman was a self-sacrificing “comrade-woman” who shared in the struggles of her male peers. She was depicted in the literature as an asexual sister-in-arms whose public activities never cast any doubt on her virtue and chastity. Turkish national identity was “deemed to have a practically built-in sexual egalitarianist component” (Kandiyoti, 1989:142). In this sense the image of the emancipated Turkish woman was in line with the “true” identity of the collectivity — the new Turkish nation.

Why was the question of women’s rights so central to the self-definition of the Turkish reformers? It appears that Mustafa Kemal had been highly impressed by the courage and militancy of Turkish women during the Balkan wars and World War I. Turkish women had taken up new avenues of public employment as nurses on the war front and had worked in ammunition, food, and textile factories as well as in banks, hospitals, and the administrative services. Political events led them to become involved in militant activities. The occupation of various parts of Turkey by European troops in 1919 aroused protests in which women joined, and women in Anatolia were part of Kemal’s army which launched a war against the invaders. In his speeches in later years, Kemal constantly referred to the role played by Anatolian women in the nationalist struggle. In a speech at Izmir in 1923, for example, he said:

A civilization where one sex is supreme can be condemned, there and then, as crippled. A people which has decided to go forward and progress must realize this as quickly as possible. The failures in our past are due to the fact that we remained passive to the fate of women (quoted in Jayawardena, 1986:36).

Our enemies are claiming that Turkey cannot be considered as a civilized nation because this country consists of two separate parts: men and women. Can we close our eyes to one portion of a group, while advancing the other, and still bring progress to the whole group? The road of progress must be trodden by both sexes together, marching arm in arm (quoted in Kili, 1991:7).

This sentiment has parallels with one shared by a number of Turkish writers who stressed the harmful individual and national effects of the subordination of women. Various stories and essays depicted individual women who suffered from subjugation, children who suffered because of their mother’s ignorance, and households that suffered because women could not manage money properly. The solution to these individual and household problems was education for women. Other writings depicted women who descended into abject poverty when their husbands or fathers died. The solution to that particular problem was work for women. Other stories showed how society and progress suffered when women were kept illiterate and subordinated to men (see Dogramaci, 1984).

Surely, in answer to Kandiyoti’s (1989) question, which is also the title of her essay, “Women and the Turkish State: Political Actors or Symbolic Pawns?,” one may conclude that, to the Turkish reformers, the women of Turkey were both participants in the nationalist and political struggles

and symbols of the new Turkey. As Suna Kili (1991) argues, the Kemalists’ hatred and suspicion of, and experiences with, the traditional order became the source of the processes leading to the initiation of the Turkish Enlightenment. Women’s rights and women’s emancipation were integral parts of Turkey’s modernization plan.

However, Turkey’s secular civil code cast women as subordinates of their husbands, a sign of the incomplete nature of Kemalism, according to many contemporary Turkish feminists. Moreover, the vast majority of Turkish women never enjoyed their rights to education and gainful employment. As rural residents and unpaid family workers on small farms, these women have only partial education, limited legal literacy, and no participation in formal politics. Disillusionment with state authoritarianism, the persistence of patriarchy, and women’s second-class citizenship led to the rise of feminist activism in the 1980s and 1990s.

Socialism and Women’s Rights in the People’s Democratic Republic of Yemen

In November 1967, after five years of guerrilla fighting, the National Liberation Front came to power and terminated 128 years of British colonial rule in South Yemen. The People’s Democratic Republic of Yemen (PDRY) was born, and soon came to be known as the Cuba of the Middle East. In June 1969, the revolutionary government deemed it necessary to attempt to “destroy the old state apparatus”, create a unified, state-administered legal system, and effect rapid social transformation (Molyneux, 1989:195). Tribal segmentation and the local autonomy of ruling sheikhs, sultans, and emirs had resulted in a country devoid of a unified national economy, political structure, and legal system. The PDRY deemed such a social order to be an obstacle to economic development and social reform. The party also viewed the active participation of women necessary to accomplish these goals. Kin control over women and the practice of seclusion thus had to be transformed. In this context, the Constitution of 1970 outlined the government’s policies toward women, and a new Family Law was proposed in 1971 and passed in 1974. Both the political stance and the legal reforms were inspired by the Soviet Union and other socialist experiments.

The National Liberation Front of Yemen described itself as “the vanguard of the Yemen working class,” and its official doctrine was inspired by the writings of Marx, Engels, and Lenin. Article seven of the Constitution, which described the political basis of the revolution as an “alliance between the working class, peasants, intelligentsia and petty-bourgeoisies,” went on to add that “soldiers, women, and students are regarded as part of this alliance by virtue of their membership in the productive forces of the people”. The Constitution recognized women as both “mothers” and “producers” and, therefore, part of the “working people.” In giving all citizens the right to work and in regarding work as an obligation in the case of all able-bodied citizens; the Constitution called upon women not yet involved in “productive work” to become involved (quoted in Molyneux, 1989:203).

Although the traditional heading for a document in the Islamic world is “In the Name of God,” the PDRY Family

Law began “In the Name of the People.” According to the preamble of the Family Law, the “traditional” or “feudal” family is “incompatible with the principles and programme of the National Democratic Revolution ... because its old relationships prevent it from playing a positive role in the building up of society.” The law began by denouncing “the vicious state of affairs which prevails in the family,” and proclaimed that “marriage is a contract between a man and a woman who are equal in rights and duties, and is based on mutual understanding and respect” (quoted in Molyneux, 1989: 205). The Family Law established the principle of free-choice marriage, raised the minimum legal age of marriage to sixteen for girls and eighteen for boys, abolished polygamy except in exceptional circumstances such as barrenness or incurable disease, reduced the dower (*mahr*), stipulated that both spouses must bear the cost of supporting the family’s economy, ended unilateral divorce, and increased divorced women’s rights to custody of their children. Indeed, there was a rise in the number of divorces initiated by women immediately after the law was adopted. In 1978, a new civil law awarded the house to a divorced wife with children from the marriage. According to the Family Law, “marriage is a contract between a man and a woman, equal in rights and responsibilities, based on mutual understanding and respect; its purpose is the creation of the cohesive family which is considered to be the foundation stone of the society” (Boxberger, 1998: 130). The General Union of Yemeni Women became especially active in the literacy campaign and in the campaign to gain support for the Family Law.

Both the new constitution and the family law defined women in new ways. As Molyneux (1989: 211) has noted, women were interpellated as workers, national subjects, and political subjects — in order to help construct the new order. The rearticulation of gender was an integral part of the restructuring of state and society. Gender redefinition was both a reflection of the new regimes political agenda and the means by which the new state could establish its authority and carry out its revolution.

The Yemeni revolutionaries encouraged women’s entry into the political realm, and women were given the vote in 1970 when universal suffrage was implemented. A special effort was made to ensure that some women candidates stood for election in the first national poll of 1977. Women were also drawn into political activity through organizations such as the Women’s Union, the Yemeni Socialist Party, and neighborhood associations. At that time, the Women’s Union had a membership of 14,296, which included 915 women workers employed in factories and workshops, 528 agricultural workers and members of co-ops and state farms, 253 employees of various government agencies, students from secondary schools and universities, and housewives (Molyneux, 1987).

In practice, not all women were able to enter public life. Notwithstanding some socioeconomic development and expansion of state authority, the PDRY government could not implement its vision of a literate and productive society and emancipated women citizens. South Yemen remained poor, and among many families there was still a cultural

stigma attached to women performing income-generating activities outside the home. A women’s conference held in April 1984, a decade after the Family Law had been passed, concluded that there were problems with the implementation of the law. Disagreements within the party and pressures from surrounding countries forced a change in the PDRY. In 1990 the PDRY merged with its northern half, the Republic of Yemen, which was politically and culturally conservative as well as tribal dominated. A retreat from full citizenship rights for women was inevitable. Upon unification, the PDRY Family Law was abolished, principles of Sharia became the legal standard for family law, and women judges appointed by the PDRY were removed from the bench (Boxberger, 1998).

Among other things, the case of the PDRY illustrates the reversibility of laws and policies without the backing of a social movement. And yet, women’s activity as candidates, voters, and monitors in the 1997 elections, in which two women from Aden won parliamentary seats, suggests a continuing struggle to redefine women’s citizenship in the new Yemen.

The Saur Revolution and Women’s Rights in the Democratic Republic of Afghanistan

In April 1978, the People’s Democratic Party of Afghanistan (PDPA) seized power, in what came to be called the Saur (April) Revolution, and established the Democratic Republic of Afghanistan (DRA). Soon afterwards, the PDPA introduced rapid reforms to change the political and social structure of Afghan society, including patterns of land tenure and gender relations, in what was one of the poorest and least developed countries in the world. The government of President Noor Mohammad Taraki targeted the structures and relations of “tribal-feudalism,” enacted legislation to raise women’s status through changes in family law — including practices and customs related to marriage — and initiated policies to encourage female education and employment. As in other modernizing and socialist experiments, the “woman question” constituted an essential part of the political project. The Afghan leadership was motivated by a modernizing outlook and socialist ideology that linked Afghan backwardness to feudalism, widespread female illiteracy, and the exchange of girls. The leadership resolved that women’s rights to education, employment, mobility, and choice of spouse would be a major objective of the “national democratic revolution.” The model of revolution and of women’s emancipation was Soviet Russia, and the Afghan Revolution was considered to belong to the family of revolutions that also included Vietnam, Cuba, Algeria, the PDRY, and Ethiopia.

Governmental decrees on land redistribution and the cancellation of peasants’ debts and mortgages were in part measures to wrest power from traditionalist leaders. In addition, the government promulgated Decree No. 7, which was designed to fundamentally change practices associated with marriage, including household indebtedness through excessive marriage expenditures, extremely high dowers, and the monetary exchange of girls. It was further intended to ensure women’s equal rights with men. The first two articles in Decree No. 7 forbade the exchange of a woman

in marriage for cash or kind and other payments customarily due from a bridegroom on festive occasions; the third article established an upper limit of 300 afghanis (the equivalent then of US \$10) on the *mahr*. The legislation aimed to change marriage customs so as to give young women and men independence from their marriage guardians. Articles four to six of the decree set the ages of first engagement and marriage at sixteen for women and eighteen for men. The decree further stipulated that no one, including widows, could be compelled to marry against her will (referring to the customary control of a married woman by her husband and his agnates, who retained residual rights to her in the case of her widowhood). The decree also stipulated that no one could be prevented from marrying if she or he so desired. In a speech on November 4, 1978 President Taraki declared that through the issuance of Decrees Nos. 6 and 7, "the hard-working peasants were freed from bonds of oppressors and money-lenders," and that the decrees ended "the sale of girls for good as hereafter nobody would be entitled to sell any girl or woman in this country" (quoted in Tapper, 1984:292).

Along with the promulgation of Decree No. 7, the DRA embarked upon an aggressive literacy campaign. This was led by the Democratic Organization of Afghan Women (DOAW), whose objectives were to educate women, bring them out of seclusion, and initiate social programs. Throughout the countryside, PDPA cadre established literacy classes for village men, women, and children; by August 1979, the government had established 600 new schools. The DRA's rationale for pursuing the rural literacy campaign with some zeal was that all previous reformers had made literacy a matter of choice; male guardians had chosen not to allow their wives, sisters, or daughters to be educated. As a result, 96 percent of all Afghan women were illiterate. It was therefore decided that literacy would no longer remain the choice of men, but would rather be the law.

The DRA was attempting to implement what reformers and revolutionaries had done in Turkey, Soviet Central Asia (see Massell, 1974), and South Yemen, as well as to carry out what earlier Afghan reformers and modernizers had tried to do in the early 20th century but had failed (see Gregorian, 1969). However, DRA attempts to change marriage laws, expand literacy, and educate rural girls met with strong opposition by rural vested interests. Decrees 6 (on land reform) and 7 (on marriage) deeply angered rural tribesmen and the traditional power structure. In the summer of 1978, refugees from Afghanistan began pouring into Pakistan, giving as their major reason the forceful implementation of the literacy program among women. There was also universal resistance to the new marriage regulations which, coupled with compulsory education for girls, raised the threat of women refusing to obey and submit to family authority. An Islamist opposition organized and conducted several armed actions against the government in the spring of 1979. By December 1979, the situation had deteriorated to such an extent that the Soviet Army intervened. A long civil war ensued during which the Islamist forces were assisted by the United States, Pakistan, Saudi

Arabia, the Islamic Republic of Iran, and China.

In 1980, the PDPA slowed down its reform program and announced its intention to eliminate illiteracy in the cities within seven years and in the province within ten. The DRA was not able to centralize power or impose its will through an extensive administrative and military apparatus. Nor did twelve years of civil war and a hostile international climate provide conditions propitious for progressive social change. In 1987, the Democratic Republic of Afghanistan was renamed the Republic of Afghanistan, and the liberation of women took a back seat to national reconciliation. In 1990, the PDPA changed its name to the National Party, or *Hizb-e Watan*. Similarly, constitutional changes were made; clauses that expressed the equality of men and women were eliminated, and Muslim family law was reinstated. In 1992 the whole experiment collapsed, and the Mujahideen set up an Islamic regime. Their very first act was to make veiling compulsory.

The Rabbani regime, however, was unable to engage in state-building, due to the collapse of the Mujahideen alliance and the onset of internecine warfare and lawlessness. In 1996, Rabbani and his allies were overthrown by a new opposition group, the Taleban, whose practices and policies give new meaning to male privilege and female exclusion. Although citizenship rights do not exist in what is essentially a pre-modern communal society, the new codes and policies legislate an exaggerated concept of male-female differences in which politics and warfare are completely masculinized, while the invisible Afghan woman, confined to her home or engulfed in her *burqa*, symbolizes national identity, cultural authenticity, and religious purity.

National Liberation, Identity, and Women's Rights in Algeria

The French assumed control of Algeria in June 1830. In contrast to colonial policy in Tunisia after 1882 and in Morocco after 1919, an attempt was made in Algeria to dismantle Islam, its economic infrastructure, and its cultural network of lodges and schools. By the turn of the century, there were upwards of one-half million French-speaking settlers in Algeria. By 1930, European competition ruined most of the old artisan class. Small shopkeepers such as grocers and spice merchants survived, but other small shopkeepers suffered severely from the competition of the *petit colons*. Industrialization in Algeria was given a low priority by Paris during the inter-war period. Local development and employment generation were severely hampered, and there was considerable unemployment and male migration. Fierce economic competition, cultural disrespect, and residential segregation characterized the Algerian situation. In this context, many Algerians regarded Islam and Muslim family law as sanctuaries from French cultural imperialism (Knauss, 1987:49). To many Algerian men, the unveiled woman represented a capitulation to the European and his culture; she was a person who had opened herself up to the prurient stares of foreigners and who was vulnerable to rape. The popular reaction to the *mission civilisatrice* was a return to the land and to religion, the foundations of the old community. Islam was transformed, the patriarchal family expanded in importance, and the protec-

tion and seclusion of women were viewed by Algerians as increasingly necessary.

When the *Front de Liberation Nationale* (FLN) was formed, there was no provision for women to enjoy any political or military responsibilities. Nonetheless, military exigencies soon forced the officers of the *Armée de Liberation Nationale* (ALN) to use some women combatants. Nearly 10,000 women participated in the Algerian revolution; the overwhelming majority were nurses, cooks, and laundresses (Knauss, 1987:75). Many women played an indispensable role as couriers, however, and because the French rarely searched them, women often carried bombs. One emancipatory development during the national liberation struggle was the admittance of unmarried women into the ranks of the FLN and ALN, and the emergence by default of voluntary unions (marriages without family arrangements) presided over by an FLN officer. Alya Baffoun (1982: 234) notes that, during this “rather exceptional period of struggle for national liberation,” for example, the marriage of Djamila Bouhired to an “infidel” non-Muslim foreigner was easily accepted, and he was assimilated into her community.

After independence, the September 1962 Constitution guaranteed equality between the sexes and granted women the right to vote. The Constitution also made Islam the official state religion. Ten women were elected deputies of the new National Assembly and one of them, Fatima Khemisti, drafted the only significant legislation to affect the status of women. This legislation was passed by the National Assembly after independence (Knauss, 1987:98). In this optimistic time, when heroines of the revolution were being hailed throughout the country, the Union Nationale des Femme Algeriennes (UNFA) was formed. Indeed, one consequence of the Algerian Revolution, and of women’s role in it, was the emergence of the *Moudjahidates* model of Algerian womanhood. The heroic Algerian woman fighter was an inspiration to the 1960s and 1970s generation of Algerians, particularly Algerian university women (see Bouatta and Cherifati-Merabtine, 1994).

But another, more patriarchal, tendency was also at work during and after the Algerian Revolution. One expression of this was pressure on women fighters during the liberation struggle to marry and thus prevent spurious talk about their behavior. Moreover, despite the incredible sacrifices of Algerian women, and although women militants “acceded to the ranks of subjects of history,” the Algerian revolution tended to be cast in terms of male exploits, while heroic female feats received comparatively minimal attention (Bouatta, 1994). In a display of authoritarianism following independence, President Ben Bella banned all political parties; the Federation of the FLN in France, which had advocated a secular state, was dissolved, and the new FLN general secretary, Mohammed Khider, purged the radicals — who had insisted on the right of workers to strike — from the union’s leadership. Of women, Khider proclaimed: The way of life of European women is incompatible with our traditions and our culture...We can only live by the Islamic morality. European women have no other preoccupations than the twist and Hollywood stars,

and don’t even know the name of the president of their republic” (quoted in Knauss, 1987:99). In contrast to the political and cultural atmosphere of the national liberation struggle, patriarchal values became hegemonic in independent Algeria. In this context, the marriage of another Algerian heroine, Dalila, to a foreigner was deemed unacceptable. Baffoun (1982:234) reports that Dalila’s brother abducted and confined her “with the approving and silent consent of the enlightened elite and the politically powerful.”

Thus, notwithstanding the participation of nearly 10,000 women in the Algerian revolution, their future status was already shaped by “the imperative needs of the male revolutionaries to restore Arabic as the primary language, Islam as the religion of the state, Algeria as a fully free and independent nation, and themselves as sovereigns of the family” (Knauss, 1987.xiii). In referring to women and their social roles, the FLN organ *El Moudjahid* opposed the term “emancipation” (identified with the French colonizers and hence, considered alien) and preferred that of “Muslim Woman” (presented as the ideal for Algerian women and which supposedly encapsulated dignity, advancement, and cultural integrity). Cherifati-Merabtine (1994: 48) recognizes the danger in this formulation, but states that “in this context [it] had a political rather than a religious meaning”.

Algerian marriage rates soared in the 1960s. By 1967, ten percent of Algerian girls were married by the age of fifteen, and 73 percent of women were married by the age of twenty. The crude fertility rate was 6.5 per woman. The Boumedienne government’s policy on demographic growth was predicated on the assumption that a large population is necessary for national power. The state, therefore, opposed all forms of birth control unless the mother had already produced at least four children. By the end of the Boumedienne years in 1979, 97.5 percent of Algerian women were without paid work. The UNFA, meanwhile, which had been launched as a national women’s organization, was incorporated as the women’s auxiliary of the FLN, and therefore made devoid of feminist objectives. In the 1970s and the 1980s although female candidates were elected to provincial and local assemblies and a few were appointed to ministerial and sub-ministerial positions but the Algerian political class was overwhelmingly male and women remained greatly under-represented in political decision-making positions.⁸ The small Algerian professional class included women in such occupations as doctor, nurse, teacher, university professor, and — significantly — judge. But the vast majority of Algerian women were homemakers, did not take part in gainful employment, and had no access to economic resources or income. By 1990 Algerian women aged 15-65 comprised only 8 percent of the labor force. This figure is not only minute by international standards, but it is also small even by regional standards.

State-sponsored education in Algeria, however, created a generation of Algerian women who became a restive force for progressive social change. These are the women who loudly and visibly challenged the conservative Family Code in the early 1980s, who confronted the Islamist fundamentalist movement and terrorism in the 1990s, and who

have made demands on the state for legal, political, and social changes.

Revolution, Islamization, and Women in Iran

In 1978 and 1979, scores of women participated in the Iranian Revolution against the Shah, and the massive participation of women was vital to the success of the insurrection. Like other social groups, their reasons for opposing the Shah were varied, but they included economic deprivation, political repression, and identification with Islamism. The large street demonstrations were marked by huge contingents of women wearing the veil to symbolize their opposition to Pahlavi bourgeois or Westernized decadence. Many women who wore the veil as a protest symbol, however, did not expect *hijab* (veiling) to become mandatory. Thus, when the first calls were made in February 1979 to enforce *hijab*, and when Ayatollah Khomeini was quoted as saying that he preferred to see women in modest Islamic dress, many women were alarmed. Spirited protests and sit-ins were led by middle-class leftist and liberal women, most of them members of political organizations or recently-formed women's organizations. Limited support for women's protests came from the main political groups. As a result of women's protests, the ruling on *hijab* was rescinded – but only temporarily. With the defeat of the Left and the Liberals in 1980, and their elimination from the political terrain in 1981, the Islamists were able to reinstitute compulsory veiling and to strictly enforce it.

The idea that women had “lost honor during the rule of Mohammad Reza Pahlavi and especially during the 1960s and 1970s, was widespread. Anti-Shah oppositionists decried the overly made-up “bourgeois dolls” of the Pahlavi era such as television announcers, singers, and upper-class professional women. As in Algeria, the Islamists in Iran felt that “genuine Iranian cultural identity” had been distorted by *gharbzadegi* or Westernization. The unveiled, publicly visible woman was viewed as both a reflection of Western attacks on indigenous culture and as the medium by which the attacks were effected. The growing number of educated and employed women disturbed men who regarded the modern woman as a manifestation of Westernization and imperialist culture as well as a threat to their own manhood (Tohidi, 1988). In response to the rising tide of modern women, Islamists projected the image of the noble, militant, and selfless Fatemeh — daughter of the Prophet Mohammad, earlier popularized by the late radical Islamic sociologist Ali Shariati — as the most appropriate model for the new Iranian womanhood.

During the 1979-80 period, the then quite dynamic women's movement, bifurcated to include pro-Khomeini and anti-Khomeini women. Even Islamist women held different perspectives on women's rights issues, including the veil. For example, many women wore the veil to guard against men who harassed women in Western dress. But the legal imposition of *hijab* was not about protecting women, and it was certainly not part of any struggle against male sexism: it was about negating female sexuality and thereby protecting men. More profoundly, compulsory veiling signaled the (re)definition of gender rules, and the veiled woman symbolized the moral and cultural transformation of

society. This ulterior purpose of veiling women to advance a moral revolution contrived to protect men is spelled out in the booklet *On the Islamic Hijab* by a leading Iranian cleric, Murteza Mutahhari, who was assassinated in May 1979. The preface, written by the International Relations Department of the Islamic Propagation Organization, argues that Western society:

looks at women merely through the windows of sexual passion and regards woman as a little being who just satisfies sexual desires...Therefore, such a way of thinking results in nothing other than the woman becoming a propaganda and commercial commodity in all aspects of Western life, ranging from those in the mass media to streets and shops (Mutahhari, 1987:5).

Mutahhari (1987:21-22) himself wrote:

If a boy and a girl study in a separate environment or in an environment where the girl covers her body and wears no make-up, do they not study better?...Will men work better in an environment where the streets, offices, factories, etc., are continuously filled with women who are wearing make-up and are not fully dressed, or in an environment where these scenes do not exist?

The truth is that the disgraceful lack of *hijab* in Iran before the Revolution...is a product of the corrupt western capitalist societies. It is one of the results of the worship of money and the pursuance of sexual fulfillment that is prevalent amongst western capitalists.

The idea that women had lost their modesty and men had lost their honor during the Pahlavi era was widespread. Such attitudes motivated the early legislation pertaining to women. The 1979 Constitution spelled out the place of “Woman” in the ideal Islamic society which the new leadership was trying to establish in Iran: within the family, through the “precious foundation of motherhood,” and in rearing committed Muslims. Motherhood and domesticity were described as socially valuable, and the age of consent was lowered to the onset of puberty. Legislation was enacted to alter gender relations and make them as different as possible from gender norms in the West. In particular, the Islamic Republic emphasized the distinctiveness of male and female roles, a preference for the privatization of female roles, the desirability of sex segregation in public places, and the necessity of modesty in dress and demeanor and in media images. And yet Iran's Islamists were aware of modern civic roles; public activity by women was never barred and they retained the vote. The Introduction to the Constitution mentions women's “active and massive presence in all stages of this great struggle,” and states that men and women are equal before the law. This stated equality, however, is belied by their differential treatment before the law, particularly in the area of personal status or family law.

That gender was inscribed in Iran's national identity politics is vividly captured in the following passage from an editorial in the women's magazine *Zan-e Rouz*:

Colonialism was fully aware of the sensitive and vital role of woman in the formation of the individual and of human society. They considered her the best tool for subjugation of the nation...In the underdeveloped countries...women serve as the unconscious accomplices of the powers-that-be in the destruction of indigenous culture. So long as indigenous culture persists in the personality and thought of people in a society, it is not easy to find a political, military, economic or social

presence in society...And woman is the best means of destroying the indigenous culture to the benefit of imperialists. In Islamic countries...Islamic belief and culture provide people of these societies with faith and ideals...Woman in these societies is armed with a shield that protects her against the conspiracies aimed at her humanity, honor and chastity. This shield verily is her veil. For this reason, in societies like ours, the most immediate and urgent task was seen to be her unveiling, that is, disarming woman in the face of all calamities against her personality and chastity. ... It is here that we realize the glory and depth of Iran's Islamic Revolution. This revolution transformed everyone, all personalities, all relations and all values. *Woman was transformed in this society so that a revolution could occur* (quoted in Najmabadi, 1994:370, emphasis added).

In the late 1980s, some of the more discriminatory of the laws that were passed after the revolution were contested by "Islamic feminists" and were modified or overturned (see Moghadam, 1993, 1999). These women have also been keen to exercise their political rights and to run for office and serve in the parliament; and they have called for greater custody rights for women and for the right of women to serve as judges. In a sense, they wish to realize the Marshallian definition of citizenship as "full participation in the national community." Secular feminists in Iran, however, including several lawyers, argue that the Constitution, family law, and penal code are still highly biased against women, and that "the community" systematically privileges men.

Summary

These various examples from the Middle East demonstrate the gendered nature of nationalism, identity-formation, state-building, and concepts of rights. But should not be inferred from the above case-studies that gendered nationalism and adverse outcomes for women are unique to the region. The processes seem to be universal:

"State elites have discovered that promoting male domination contributes to the maintenance of social order in a period of state formation...[L]eaders of new states share a set of problems: how to eliminate rival sources of power and at the same time provide material resources for the state and allegiance to the state. A common solution involves offering a bargain to (some) men: in return for ceding control over political power and social resources to the state, they gain increased control over their families. Not only does this solution promote male domination, but it also establishes or strengthens a distinction between public and private spheres, and subordinates the private sphere to the public." (Everett, Staudt and Charlton, 1989: 180).

Nonetheless, many of the feminist scholars who have theorized the place of gender in national processes (e.g., Yuval-Davis, Kandiyoti, Najmabadi, Moghadam), have developed their arguments partly as a result of their observations of or experiences in specific national or nationalist projects in the Middle East. These feminists and others are now grappling with the meaning of feminist activism in the Middle East, and its implications for gender relations, for citizenship, for the public/private divide, and for the relationships among state, civil society, and family. In the section below, I consider how women are responding to their "place" in constructions of the nation and of the rights of citizens. I will show the extent of women's political rights

and participation, and discuss the call for greater civil and social rights in an effort to extend women's citizenship.

Contemporary Struggles for Women's Citizenship

Citizenship has been a key term in many feminist political struggles, from women's suffrage to current debates around the welfare state and immigrants' rights in Europe and North America. As Narayan (1997) points out, many current struggles by women for "dignity, political participation, and nationality" have strong connections to citizenship. In the Middle East and North Africa, the struggle for civil, political, and social rights is led by women's organizations, which are comprised of highly educated women with employment experience and international connections (see data in Tables 1 and 2). The fact that these organizations exist at all is a sign of women's increasing access to the public sphere and of the gradual process of democratization in the region. What is noteworthy is that they are working to change the nature of that public sphere, to enhance the rights of women in the private sphere, and to advance democratization.

The 1990s have seen the proliferation of women's organizations — some explicitly feminist — in the region. These include service organizations, worker-based organizations, professional associations, women-in-development NGOs, research centers and women's studies institutes, and human rights/women's rights organizations. North Africa is home to many active women's rights groups. These include la Commission Femmes de la Ligue Tunisienne des Droits de l'Homme and l'Association Tunisienne des Femmes Démocrates; Morocco's l'Organisation Marocaine pour les Droits des Femmes, l'Association Démocratique des Femmes du Maroc, and l'Union de l'Action Féminine (many of whose members have been involved with the publication *8 Mars*). These and other North African feminist groups, including Algerian feminist groups, formed the Collectif 95 Maghreb Egalité, which was the major organizer behind the "Muslim Women's Parliament" at the NGO Forum that preceded the Beijing Conference in September 1995.⁹ Among its many activities, the Collectif has formulated an alternative "egalitarian family code". Social rights are also on the agenda. In Morocco in 1995, a roundtable on the Rights of Workers was organized by the Democratic League of Women's Rights, and a committee structure was subsequently formed, consisting of 12 participating organizations. The objective was the revision of the labor code to take into account women's conditions, to include domestic workers in the definition of wage-workers and the delineation of rights and benefits, to set the minimum work age at 15, and to provide workers on maternity leave with full salary and a job-back guarantee.

These and other women's organizations were represented at an important meeting of the region's non-governmental women's organizations, which took place in early November 1994 in Amman, Jordan. The two-week deliberations resulted in a document entitled "Work Program for the Non-Government Organizations in the Arab Region".¹⁰ The document identifies women's conditions in Arab countries as follows: (1) Women suffer a lack of employment rights and undue burdens caused by economic

crisis and structural adjustment policies. (2) The absence of democracy and civil rights harms women especially. (3) There is inequality between men and women in authority and decision-making. (4) Women suffer from violence, including "honor crimes." The solutions offered are comprehensive. The document calls for the immediate ratification and implementation of the Convention on the Elimination of All Forms of Discrimination against Women, and a revision of all national laws that discriminate against women. It calls for legal literacy and free legal services for women, and the promotion

of women judges. It calls for “revision and modernization of the legislation related to women’s status in the family”, and the insertion of the rights of the wife in the marriage contract. And it calls for “the amendment of nationality laws so that children can join their mothers and enjoy their nationalities” [versus being automatically tagged with their father’s nationality] (pp. 25-26).

This document and other literature from various women’s groups in the region lead me to conclude that in the 1990s women’s struggle for citizenship in countries of the Middle East and North Africa revolves around four key issues: the modernization of family laws, the criminalization of domestic violence, nationality rights for women, and equality of opportunity for women in employment and greater representation of women in formal political structures. Several characteristics make this struggle distinctive. First, it is a struggle for political, civil, and social rights in a part of the world where there is a conspicuous discrepancy between women’s rights in constitutions (which usually declare men and women as equals) and in family codes or in personal status codes (which delineate different rights and obligations for men and for women). Second, the women’s movement for full citizenship is occurring against the backdrop of Islamism and its patriarchal agenda. Third, prospects for women’s citizenship vary across the region; depending on the relative strength or weakness of the state and central authorities compared with tribal or communal forces. And fourth, in a handful of cases (in the Gulf region), women’s political rights have yet to be addressed, concepts of civil rights hardly exist, and “social rights” are handouts (albeit generous ones) from oil-rich governments rather than entitlements accrued to tax-paying and gainfully employed citizens.

In newly-emerging states such as Palestine, given the existence of a tradition of women’s activism and of a conducive political opportunity structure in the late 1980s, the struggle to insert principles of women’s rights and gender equality in the basic laws has, nonetheless, proven to be more difficult than previously imagined. This is largely due to the rise of an Islamism movement, itself the result of frustration and anger over the non-resolution of the conflict with Israel. Here, as in some other historical cases, the re-masculinization of disempowered males seems to be incumbent upon the domestication of women and their relegation to the private sphere. Citizenship rights are severely circumscribed in those sheikhdoms in the Gulf that lack electoral institutions and are still ruled by royal families. Bahrain, Oman, Qatar and Saudi Arabia have no type of elected national assembly. Kuwait and the United Arab Emirates do have small (50 and 40 members, respectively) national assemblies, but women are not allowed to vote or run for office. The lack of rights accorded to contract workers is well known.

But even in countries where women do have the right to stand as candidates, few make it to national office. As Table 1 and 2 show, in 1996 five of the region’s 14 countries had women in their cabinets. Jordan, Syria, Egypt and Algeria each had two female ministers. There was one woman member of the Palestinian National Authority. No Arab or

Iranian woman has ever been prime minister of her country. Turkey has had a female prime minister, but like Iran and the Arab countries, the percentage of women representatives in the national assembly is tiny: between one and ten percent. It is precisely this state of affairs that the women’s organizations are seeking to change.

In the sections below, we survey the politico-legal status of women and the demands of the women’s organizations in key countries of the region.

Egypt

In Egypt, women were granted citizenship and full political rights in the 1956 constitution. The 1957 elections witnessed the participation of women for the first time, and Rawya ‘Atiya was elected as the first woman parliamentarian in the Arab world. The Nasserist regime, which espoused a socialist ideology, tried to encourage women’s participation in all administrative and political positions. However, “the culture of the one-party system did not promote an acceptance of political plurality. Therefore, when the multi-party system was reintroduced in 1976 under Sadat, political participation rates for women were low, as they were for society in general” (Abu-Zayd, 1998: 44). Moreover, “the social and economic environment in the country has worked against women exercising their political rights. Values encouraging the participation of women in public affairs have coexisted with more reactionary values, and the conflict between the two has varied over time” (Abu-Zayd, 1998: 43). Since the early 1980s the conflict has become more intense due partly to the ascendancy of Islamists and partly to the neoliberal economic policy agenda including the reduction of state subsidies intended to address the economic crisis which has, in turn, intensified the burden on household budgets and reinforced conservative views and practices.

Nevertheless, Egypt is home to numerous women’s organizations. These include professional associations such as the Women Writers’ Association, Women in Film, the Medical Women’s Association, and the Women Scientists’ Society. In June 1995, the women’s chapter of the Egyptian Association for Industry and Environment led a national workshop on “the role of women in protection of environment and natural resource conservation.” Feminist groups include the New Woman Research and Study Center (which produces research to help create, by its own definition “a powerful Egyptian women’s movement”); Noor, which promotes Arab women’s writings by, inter alia, publishing good quality, low-cost paperback editions, and the Reproductive Rights Group. The Legal Research and Resource Center for Human Rights publishes a monthly journal “People’s Rights”, and a quarterly women’s issues “People’s Rights: Women’s Rights.” The Association for Development and Enhancement of Women (ADEW) prioritizes income-generating projects for low-income women and women heading households alone. Feminist groups have organized and protested violence against women within the family. The New Woman Research Center believes that women’s reproductive rights, as well as women’s social and political citizenship, are central to basic human rights (Al-torki, 1998).

Given Egypt's conservative cultural environment, the feminist organizations are small and largely ineffective, unable to influence policy and legislation and uninvited to do so by official bodies. However, in a society where a man charged with raping a young woman traditionally escaped punishment by offering to marry the victim, the April 1999 law that criminalizes rape may be regarded as an advance.

Lebanon

In Lebanon, where women have had the right to vote and stand for election since 1957, the first woman MP was only elected in 1992, following the long civil war. In 1996, only three of Lebanon's 128 parliamentary seats, or 2.3 percent, were occupied by women. Parliamentarians Maha al-Khuri and Bahaya al-Hariri have the following assessment: "We have not been able to create any women's solidarity body; we have not reached a ministerial position; and we haven't succeeded in eradicating discrimination between women and men in personal status legislation. This despite the fact that we have been successful in other professions, but not in politics" (Abu-Zayd, 1998: 49). In fact, organizations such as the Lebanese Women's Council, the League of Lebanese Women's Rights, and the Lebanese Association of Women Lawyers have identified unification and modernization of the country's numerous sect-based family laws as a major goal. In Lebanon, personal status laws are governed by religious tribunals, thus making Lebanese women unequal not only to men but also vis-a-vis each other. Since 1959, non-Muslim women are entitled to the same inheritance as male heirs, while to this day, most Muslim women receive only half of it. In addition, polygamous marriages are permitted within Muslim communities while they are prohibited by Christian courts. And while Muslims may divorce, some Christian sects prohibit divorce. Such distinctions have led women's groups to call for the adoption of a civil marriage law.

Pressure from women's rights groups has led to the repeal of two discriminatory laws: the commercial law which stipulated that wives had to secure their husband's permission to engage in any business venture, a permission that could be withdrawn at will; and the Law of Obligations and Contracts, which prohibited women from acting as witnesses in real-estate matters (Shehadeh, 1998: 502). Other problems remain. One important issue is the right of nationality. While a foreign woman married to a Lebanese man is granted Lebanese citizenship after a period of one year and at her request, a Lebanese woman married to a foreigner is prohibited from giving Lebanese citizenship to her husband and children even if they were born and are living in Lebanon (Shehadeh, 1998: 512). Other forms of legal discrimination are found in the penal code (with respect to "honor crimes" and to adultery) and in employment policies (which gives women lesser rights in pensions). Lebanese scholars and activists point out that "The Lebanese constitution stipulates that all Lebanese are equal before the law and enjoy the same civil and political rights and share the same duties and obligations, including the right to public employment according to merit, without any discrimination, yet we find the law discriminating between the sexes in several areas" (Shehadeh, 1998: 512).

Jordan

Jordanian women won the right to vote and run for office in 1974. Yet in the country's 1989 national elections, all 12 female parliamentary candidates lost because of lack of financial backing. During the second legislative elections in 1993, only two women ran for parliament, and one, Tujan al-Faysal, won a seat in the lower house. (Two women were appointed to the upper house.) Her platform was based on human rights and democracy, and she ran as an independent. "Faysal's independent political discourse provoked the religious and conservative trends within parliament, but her passionate belief in democracy and human rights and her knowledge of Islam earned her respect among some sections of the public and enmity from the ruling establishment. As an MP, she played a key role in revealing corruption and irregularities" (Abu-Zayd, 1998). She ran again in the legislative elections of November 1997, as did Emily Naffa, but neither woman won.

Had they won, they would have implemented the top ten issues that had been identified by women at a series of meetings across the country: (1) Amending the law to give more protection to women against polygamy and divorce without proper reason, to increase compensation and alimony for divorcees, and to improve the regulations of child custody in favor of women. (2) Amending the health insurance law to include all citizens, and to achieve equal rules and regulations for men and women; a special insurance system to be created for mothers and children in case the father is not insured. (3) A new child protection law to protect women from homelessness, begging, child labor and drug trading. (4) Amending the nationality law so that Jordanian women can pass on their nationality to their non-Jordanian husbands and children. (5) A new law to protect women from emotional and physical abuse by their spouses. (6) Establishing a quota for women in parliament and diplomatic posts, and introducing a mechanism to ensure that women reach decision-making positions in the government. (7) Making school curricula more relevant to current social issues, and teaching school children how to deal with social problems. (8) Modifying the election law to make it more fair, especially those pertaining to electoral districts, minimum voting age, registration fees for candidates, and the one person, one vote system. (9) Granting women their own passport without needing the approval of a male guardian. (10) Achieving equal rights of men and women to hold professional positions according to qualifications and seniority (Khouri, 1997).

Despite — or because of — their low level of participation and representation in formal politics, Jordanian women have been involved in non-governmental and extra-parliamentary activities pertaining to women's rights. These include the formation of women's organizations and the occasional protest against women's legal status or social conditions. In November 1998, more than 250 women marched through Amman in a demonstration against domestic violence. Critical voices against "honor killings" have been raised for some time. The precipitating factor in the women's march was the arrest of a man for the killing of his 17-year-old daughter who had eloped with a boy-

friend. Women's groups demanded that perpetrators of domestic violence, including honor killings, receive tough sentences.¹¹ Another issue of importance to Jordanian women activists concerns the Nationality Law and the right to travel. At present, a Jordanian woman may not obtain a passport without the written consent of her husband or nearest male relative. If she is married to a non-Jordanian, her children cannot claim Jordanian citizenship, even if they are born and always reside in Jordan. Jordanian feminists seek removal of Jordan's reservations to CEDAW, which focus on these and related issues.

Palestine

If the 1980s were distinguished by the rise of grassroots women's committees tied to various political parties and organizations during the Intifada, the 1990s saw the rise of a women's centers movement that has been described as "nongrassroots [and] nonpartisan" (Kawar, 1998: 237). Under the Palestine National Authority, the women's centers movement is composed of "well-educated, politically sophisticated, and feminist women. They are academic and professional women who gained visibility during the intifada, speakers and researchers on the conditions of Palestinian women under the Israeli occupation. The women in this leadership group are either independent in their party orientation, or are partisans with a strong interest in women's autonomous action and empowerment." (Kawar, 1998: 237). The three best-known ones are the Women's Affairs Technical Committee, the Women's Center for Legal Aid and Counseling, and the Feminist Studies Center. The central strategic goal of the women's centers movement is women's empowerment through political education and the realization of women's rights. Activities are primarily educational: conducting research and creating data banks on women, publishing a women's magazine, holding training workshops, and providing forums on such topics as democracy, women's rights, and women's leadership. There are also women's centers that specialize in legal counseling for women or in social and psychological counseling.

Among the most politically active of these centers is the Women's Affairs Technical Committee, which is headquartered in Ramallah and is the major Palestinian women's lobbying group.¹² The WATC is known, among other things, for its proposal for a gender quota for seats in the Palestinian Legislative Council. However, this idea did not receive PNA support; only the People's Party (the former Communist Party) supported the idea (Kawar, 1998: 238). In 1995-96 the WATC successfully lobbied against several PNA regulations that discriminated against women. They succeeded in abolishing a law requiring female drivers to be accompanied by a male guardian. The Interior Ministry, following regulations in some of the Arab countries, had required that a male guardian sign for females who applied for a Palestinian passport. The WATC led the fight with letters to the PNA head, Arafat, and the Interior Ministry, with street demonstrations, petitions, and letters to the newspapers.

The Declaration of Principles on Palestinian Women's Rights invokes the PNC's Declaration of Independence, along with the Universal Declaration of Human Rights and

the Convention on the Elimination of All Forms of Discrimination against Women. It reads:

We the women of Palestine, from all social categories and the various faiths, including workers, farmers, housewives, students, professionals, and politicians promulgate our determination to proceed without struggle to abolish all forms of discrimination and inequality against women that have been imposed by the different forms of colonialism on our land, ending with the Israeli Occupation, and which were reinforced by the conglomeration of customs and traditions prejudiced against women and embodied in a number of existing laws and in legislation.

It then calls for the affirmation that "women's legal rights is in all respects a cornerstone for building a democratic Palestinian society." The document demands equality in the following areas: political rights (particularly the right to run for and hold office); civil rights (particularly to grant women the right to acquire, preserve, or change their nationality, including freedom from imposition of a husband's nationality, and their right to give citizenship to husbands and children; economic, social and cultural rights (including employment-related rights and equal opportunities).

The most important legal issue with profound gender implications is the Palestinian Basic Law, and those clauses that address sources of the law. It is of course ironic that the movement that once called for a democratic and secular Palestine should forward a constitutional statement that "Islam is the official religion of Palestine". An early draft in December 1993 made no mention at all of women's rights. Later drafts issued after strong protests guaranteed women equal rights in "public life", implicitly ceding the sphere of "private life" to Islamic family law. The women's centers have lobbied the legislature for more commitment to gender equality in the articles of the Basic Law; legal experts, including the well-known lawyer Asma Khader, have debated what a new Palestinian personal status law should look like. In these efforts they are receiving important international support and the regional office of UNIFEM has assisted them in strategic planning. Of all the political parties in Palestine, however, only the People's Party came out in favor of social insurance for all women (counting housewives as workers) and for changing social status laws to be consistent with the UN convention on women's rights (Connell, 1998).

What is the future Palestinian state to look like? Some Palestinian feminists seem to have resigned themselves to the inevitability of religious law. At the same time, they are adamant about the modernization of personal status and family law. In April 1998, the Women's Center for Legal Aid and Counseling, impatient at the slow pace of legal reform, convened the "Palestinian Model Parliament: Women and Legislation", a two-day forum. Its proceedings, which were broadcast live on Palestinian television, were denounced by Islamists. The 88 female and male "deputies" voted to remove sex discrimination from the territory's existing legislation; they placed a total ban on polygamy and raised the age of consent to 18 for both males and females. These mock amendments were then forwarded to the Palestinian Legislative Council as recommendations to be incorporated into the Basic Law when the real parliament even-

tually votes on it.¹³

Turkey

In Turkey, women entered the political scene in the 1980s with demands for redefining their civil rights, and helped move forward the process of democratization. The issues raised focused first on domestic violence and amending the inequalitarian clauses of the Civil Code, and later included the rights of prisoners and of victims of the war in the southeast, and the promotion of women's parliamentary participation. Feminists began organizing consciousness-raising groups and petition drives at a time when, several years after the 1980 military coup d'état, it was illegal to organize in any form. Because the left and right had been crushed by the coup, the feminist initiatives were deemed politically insignificant. In fact, feminist activism had broad political implications (Arat, 1994). According to Yesim Arat (1998): "It was not merely women's voices which were new on the public scene, but also demands made for individual rights." With regard to the right of women to be free from domestic violence and harassment in public places, Turkish feminists argued that violence toward women's bodies should be treated under a separate section of the criminal code as "sexual assault." Feminists also began a petition drive to rid the Civil Code of clauses designating the husband as the head of the family and the guardian of the wife. The petition was presented to Parliament in 1991.¹⁴

Scholars of Turkey's women's movement tend to distinguish the Kemalist, Feminist, and Islamist women's organizations and agendas. Kemalists perceive women as citizens and productive members of society; they advocate women's political participation in political, social and economic life "as secular and nationalist agents" (Esim and Cindoglu, 1998: 9). The feminist organizations emphasize domestic violence, women's empowerment, and consciousness-raising (ibid.: 13). Islamist women's groups "perceive women mainly in the context of their families as wives and mothers", offer social services to religious women, and argue for the right to observe *hejab* in public. Although the Islamist and Kemalist women's organizations are larger and well-financed, "the issues [the feminists] raise are slowly finding a place in the social consciousness of the Turkish political spectrum" (ibid.: 18).

In more recent years feminists have warned against the rise of an Islamist political elite and have marched in defense of secularism and in protest of fundamentalism. One such march and rally took place in February 1997 by 15,000 women and was named "women's walk against the Shariat". According to Arat, the women used slogans such as "no to Shariat," "protest fundamentalism like a woman," and "we are women, we are strong, we are against the Shariat." They also protested against Tansu Ciller, Turkey's (and the Middle East's) first female prime minister, because of her alliance with the Islamic Refah Party and because of her illicit undertakings and misleading promises. As Arat has argued, Turkish feminist activism "contribute[s] to a liberal, secular, democratizing polity" and to a discourse of universal rights (Arat, 1997: 109).

North Africa: Morocco and Tunisia

In Morocco, formal politics has been the exclusive domain of men, and the country's Code du Statut Personnel is based on the conservative Maleki school of Islamic law. And yet the women's movement has become very vocal and visible since 1990, and the new left-wing government which was formed in March 1998 appointed four women to cabinet posts. The women's movement addresses the state on such diverse political questions as family law, civil rights in the constitution, violence against women, and discrimination in recruitment of women graduates for public institutions (Naciri, 1998). Under pressure from the women's movement, Morocco ratified the UN convention on women's rights in 1993 with, however, important reservations that women's groups are seeking to have overturned. The reservations were made with regard to Article 9 (nationality), Article 16 (equality in marriage and divorce), and Article 29 (national sovereignty in settling disputes). Along with Tunisian and Algerian feminists, Moroccan feminists have been active in the Collectif 95 (now 2000) Maghreb Egalité. In the alternative, egalitarian Code formulated by the Collectif, various articles undermine the foundations of male authority and supremacy, and women's exclusion from economic and political power. Rather audaciously, they also challenge head-on religious precepts and cultural practices. These include demands for equal status in regard to inheritance; the right of Muslim women to marry non-Muslim men; and the abolition of the duty of obedience to the husband as well as abolition of responsibility of the husband for the wife (Naciri, 1998). In Morocco in late 1997, the obligation of women to obtain marital authorization in order to go into business was abolished, as was the obligation for married women to obtain marital authorization before receiving a passport.

Tunisia's Code du Statut Personnel, adopted in 1956 under the modernist Bourguiba government, reformed marriage, divorce, custody, and to some extent inheritance. By banning polygamy and repudiation, it reduced the power of husbands. As such, Tunisia's family law has been far in advance of that of Morocco. And yet Tunisian feminists, like their counterparts in Morocco, are calling for a more expanded definition of rights. As a result of their efforts, amendments to the family code were passed in July 1993. The obligation that a wife should obey her husband was dropped. An innovation was the creation of a National Fund to guarantee alimony and child support to divorced women. "If the former husband fails to provide either alimony or child support, the fund will provide the woman with the equivalent sum of money within two weeks of receipt of a legitimate petition on her behalf. The fund will then attempt to recover the money from the delinquent father" (Charrad, 1997: 308). Charrad argues that the reforms of the 1990s reflect a new development in Tunisian society: the rise of women's agency. This is partly related to the rise of Islamic fundamentalism in the region, which has resulted in an alliance between the political elite and the feminist groups in opposition to the fundamentalist movement.

Such an alliance is manifestly evident in Algeria, where the struggle for women's citizenship is also the most devel-

oped.

Algeria

In Algeria, the women's movement arguably launched the democratization movement when, in the early 1980s, small groups of women professionals and of *Moudjahidates* (women veterans of the war of liberation) gathered in front of the National Assembly building. They protested against the secret formulation of a new family code which cast women as minors and legalized polygyny. Just two months after Boumedienne's death, the Ministry of Justice announced the creation of a commission to draft a Family Code. On March 8, 1979, some 200 university women convened an open meeting at the industrial workers' union headquarters in Algiers to demand the disclosure of the identity of the members of the commission and to express their concerns and demands (Knauss, 1987:130). In January 1981 the government of Chadli Bendjedid abruptly prohibited Algerian women from leaving the country without guardian permission. This was followed by the introduction of the draft Family Code, which many women saw as an attempt to placate a growing Islamist tendency by institutionalizing second-class citizenship for women. On January 21, 1982, the group of women professionals and *moudjahidates* issued a six-point demand calling for: monogamy, the unconditional right of women to seek employment, the equal division of family property, the same age of majority for women and men, identical conditions of divorce for men and women, and effective protection of abandoned children (Bouatta, 1995).

The debate over the family code forced the government to withdraw its proposal but an even more conservative revision was presented in 1984 and quickly passed by the National Assembly before much debate resurfaced.¹⁵ The women's cycles of protest continued. Feminists point out that the Family Code contravenes the equality clauses of the Constitution, the Labor Code, and international conventions to which Algeria is a signatory (Cherifati-Merabtime, 1994). According to one observer: "The unpublished literature produced by the various women's associations at that time very much is about human rights as citizen rights: the right to participate in all affairs of the society, to make decisions in the private and the public realms. The ideals of equal citizenry, free individual expression, allegiance to a national society are to be realized in a modern republic. Before the women's protests, these issues were blurred within the populist social contract of Algerian socialism" (Cheriet, 1997: 15).

The Bendjedid government was pursuing market reforms in addition to its adoption of a conservative family law. Austerity measures combined with political frustration led to the riots of October 1988. The riots, in turn, ushered in a brief period of political liberalization which saw the increasing popularity of the Algerian Islamist movement (later called the Islamic Salvation Front or *Front Islamique du Salut* [FIS]). Algerian feminists were alarmed by statements emanating from Islamist leaders such as Ali Belhadj, who declared that "the natural place for a woman is at home" and that "the woman is the reproducer of men. She does not produce material goods, but this essential thing

that is a Muslim."¹⁶ Feminists groups were opposed to the electoral reforms that legalized religious-based parties such as the FIS, a legalization that actually contravened the constitution. The leadership of the FIS proceeded to issue statements condemning the anti-fundamentalist women as "one of the greatest dangers threatening the destiny of Algeria" and branding them "the avante-garde of colonialism and cultural aggression" (Bennoune, 1995: 197)

The period 1989-1994 also saw the formation of several feminist organizations: l'Association Indépendante pour le Triomphe des Droits de la Femme (Triomphe); l'Association pour l'Emancipation des Femmes (Emancipation); l'Association pour le Defense et Promotion des Femmes (Defense et Promotion), Cri de Femmes, Voix des Femmes, El Aurassia, and Rassemblement Algérien des Femmes Démocratiques. Their objectives include, the abolition of the Family Code, full citizenship for women, enactment of civil laws guaranteeing equality between men and women in areas such as employment and marriage and divorce, abolition of polygamy and unilateral male divorce, and equality in division of marital property. Since 1991 many of the feminists in these organizations have advanced the slogan "No dialogue with the fundamentalists."¹⁷ These and other organizations have participated in a variety of national and international independent initiatives on violence against women, including a March 1994 tribunal in Algeria "to judge symbolically the responsible Islamists and the former president of the Algeria Republic for their crimes against humanity." All the women's groups build coalitions to organize street demonstrations in Algeria to defend democracy and the citizenship of women.¹⁸

Like other feminists in the Middle East and North Africa, Algerian feminists are products of the country's social development: they are urban employed women, mostly with higher education. As Bouatta (1995: 15) explains:

The founding members of the women's movement are, in their majority, influenced by the ideology of the Left. They all come from socialist parties. They are mostly academics, students, workers, and union representatives. They convey a message of an emancipatory project based on the equality of the sexes, employment and education, which are considered as the main criteria of women's promotion and socialization. They matured under the shadow of the one-party system in its socialist phase. They are women of the post-independence who were fortunate to have access to education and training. They do not consider the day of liberation as very distant. They identify with the *moudjahidates* whom they see as the first to have cracked the patriarchal system.

Notwithstanding the disruptive nature of Algeria's economic and political crisis, it seems to have given new life to the incipient civil society. In 1989, the legalization of political parties resulted in a large number of independent interest groups emerging as political parties, "attesting to the pervasive nature of associational life in Algerian political culture" (Entelis and Arone, 1995:211). The government has had to tolerate, respond to, and interact with non-governmental organizations. This conciliatory stance of the state, and the cracks in the unity of the political elite, have favored the proliferation of non-governmental organizations. Layachi describes how interaction between the state and elements of the nascent civil society intensified after

1993, and he lists those non-government organizations, professional associations and parties that were represented in meetings with the High State Council.¹⁹ Missing from the list is the array of women's organizations that emerged in Algeria during the 1980s and 1990s. According to Bouatta, there were 20 women's associations in the first national meeting of the women in late 1989 and by 1993 perhaps as many as twenty-four.

Not only is the new women's movement a defining feature of contemporary Algeria, but Algerian feminists are seeking to become more visible and more prominent in the established political structures. Indeed, the most interesting outcome of the 1997 municipal and parliamentary elections was the election of 11 women to the National Assembly, among them several well-known activists. Among them are Louisa Hanoun, leader of the Workers Party, Khalida Messaoudi, an organizer of the 1980s protests and now of the Rally for Culture and Democracy, and Dalia Taleb of the Socialist Forces Front. As an Algerian sociologist and feminist has written, "women are entering the scene as active subjects in the construction of a new citizenship" (Cherifati-Merabtine, 1994).

Reflections on the Middle Eastern Experience

Historically and in the contemporary period, concepts and processes of nationalism, national identity, and citizenship have been infused with gender (that is, understandings of femininity and masculinity); they have included some and excluded others (whether by sex, class, religion, race, ethnicity, or national origin), and they have led to the organization of the public and private spheres in ways that privilege men and subordinate women. We have seen that in the Middle East, the relationship between national identity politics and women's rights has been unpredictable and uneasy. In some cases, nationalism and women's rights are equated; in other cases, national identity politics seeks to recuperate "traditional" norms, including the public/private division. In all cases, the "woman question" comes to the fore because women and gender relations are key to national reproduction, national culture, national citizenship, and national conflicts and wars (Yuval-Davis, 1997). In nearly all cases, the state, citizen, and public sphere have been cast as male and although the family is the province of women, its "headship" is legally male.

In T. H. Marshall's famous formulation, the 18th century was the century of civil rights, the nineteenth century that of political rights, and the twentieth century the era of social rights. As feminists have pointed out, the evolution of rights has been different for women and for members of excluded racial and ethnic groups. In the Middle East, as in many developing and post-colonial countries, the trajectory has not been the same as in Western countries, and much of the struggle over citizenship has unfolded in the twentieth century and the process continues. In some cases, an evolution with distinct stages can be identified. In others civil, political, and social rights are being collapsed into a single demand for democratization and participation. In all cases, women are at the center of the struggle to define and extend citizenship in ways that include improvements in their own social standing, political participation, and national mem-

bership.

An emerging trend evident in particular in Algeria, Morocco, and Tunisia, is that feminists (and intellectuals) are seen as ramparts against the danger of fundamentalism. Statements by government officials that are reported by the media, and some newspaper editorials, have referred to the feminists' strong opposition to fundamentalism as constituting a major bulwark against the success of Islamists. Such representations of women — in which women are depicted as citizens and political actors and not only as wives and mothers — may herald a significant shift in gender relations.

A reading of the literature produced by women's organizations and by women's human rights activists suggests that some gaps remain in the conceptualization of rights and obligations and some tensions need to be resolved. Among them are class issues (including the social rights of working men and women, and of the poor), the status and rights of immigrants and of contract workers, and the rights of religious and ethnic minorities to what Narayan calls "dignity, political participation, and nationality". This latter issue is important, given the systematic discrimination that non-Muslims experience, and their status as marginal members of the national community. The relationship between the state and citizens, and their respective rights and obligations also require elaboration. It is true, as many feminists argue (e.g., Lister, 1997), that the empowerment or full citizenship of women is an inseparable part of the formation of civil society (*pace* Pateman). But it is also true that the emergence of civil society is contingent upon the existence of a state that enforces universal legal norms and guarantees protection of civil and human rights regardless of gender, race, ethnicity, class, and religion. Through their insistence on the rights of women-as-individuals, the feminist organizations are forcing a reconsideration of the role of the state vis-a-vis its citizens. But this role and relationship needs to be more explicitly addressed.

Perhaps the most difficult tension is that between a national identity based on Islamic civilization and culture, and the call for civil and political rights that may be construed as unduly inspired by Western traditions. In a country like Lebanon, where communal traditions hold sway and the state is weak, changing the legal framework would be difficult, even though many feminists are in favor of civil codes that supercede sectarian authority. In a country like Iran, where the state is strong, legal changes may be more feasible, but there is still a powerful official ideology that invalidates "Western" concepts and practices. Nationalism and Islamism remain the major discursive frameworks. Among the countries of the region, Tunisia seems to be crafting a national identity and legal framework that reflect its own Arab-Islamic heritage as well as social and gender rights as understood internationally. Charrad (1997: 303) notes that "most Tunisian feminists consider themselves Muslims and locate themselves in the framework of an enlightened Islamic tradition. Taking a secular position, a few argue for universal entitlement to individual rights, regardless of religion. Generally, however, feminists speak for a tolerant and open Islam, as opposed to one that is mili-

tant and dogmatic." In Tunisia and elsewhere, the women's organizations need to develop a framework for recognizing identities and elaborating equal rights for all, in a way that draws on history, cultural understandings, and global standards.²⁰

In the meantime, the "modernizing women" of the Middle East are challenging popular understandings and legal codes regarding the public sphere and the private sphere; they are demanding more access to the public sphere, full and equal participation in the national community, and full and equal rights in the family. This has broad social and political implications. Al-Azmeh (1993: 36) notes that the struggle for citizenship will complete the transition from communal to civil society, but that, like all historical processes, it is highly conflictual. In Middle Eastern countries, agents of this conflictual historical process include Islamist movements, intransigent or colluding states, and women's organizations. Women's struggles in the Middle East — whether around the modernization of family laws, or in the fight against fundamentalism, or around the demands for greater employment opportunities, political participation, or nationality rights — are the central motor of the drive for citizenship.

Notes

Prepared for the Conference on "Challenging the Nation State: Perspectives on Identity and Citizenship," Ben Gurion University of the Negev, January 10-12, 1999.

¹ The specific cases are Turkey, Egypt, Iran, Afghanistan, India, Sri Lanka, Indonesia, the Philippines, China, Vietnam, Korea, and Japan.

² They have also sought to inscribe women's personal and social rights into definitions and understandings of human rights.

³ Put in another way, gender relations are embedded in the public/private divide, and in the organization of the state, civil society, and family.

⁴ I am using the concept of "national identity politics" to refer to movements and political processes organized around national, ethnic, or religious identity. For an elaboration, see Moghadam (1994).

⁵ I first used the term "modernizing women" in the dual sense of women first as the objects, and more recently as the subjects, of modernity and economic development. See Moghadam (1993).

⁶ In my previous work, I have located the origins of these two models in the French Revolution (signifying patriarchal outcomes for women) and the Bolshevik Revolution (signifying the emancipatory model).

⁷ This material is based on Chapter 3 of my book, *Modernizing Women*. Full references may be found there.

⁸ In 1987, women were only 3.3 percent of those at the ministerial level of government, and 0.0 percent at the sub-ministerial level. At the national assembly they constituted only 2 percent. These figures increased in 1994 but were still low: 7 percent of parliamentarians, 7.7 percent of those at the sub-ministerial level of government, and 3.6 percent of ministerial level positions. See *The World's Women 1995: Trends and Statistics*, Table 14, p. 17.

⁹ My observations at the NGO Forum in Huairou and discussions with participants. See also their documents: *Women in the Maghreb: Change and Resistance; One Hundred Measures and Provisions for a Maghrebian Egalitarian Codification of the Personal Statute and Family Law* [sic].

¹⁰ I attended the expert-group meeting and high-level meeting that followed the NGO conference at the invitation of ESCWA, and was able to obtain a copy of the (unedited) NGO document in English translation.

¹¹ See AP, "Jordanian Women Protest Abuse," Thursday, November 26, 1998, via Internet.

¹² Kamal led the WATC until she was named general director for women's affairs in the Ministry of Planning and International Cooperation, though she remains active in it.

¹³ See *The Economist*, April 4, 1998.

¹⁴ The petition languished there, the victim of political battles and chang-

ing governments. However, it is a measure of the influence that feminist groups have in Turkey when in June 1997 they forced the Ciller-Erbakan coalition government to withdraw a candidate to head Turkey's Ministry of Women and Family Affairs. Ludicrously, this candidate was not only a man, but a polygamous man with two wives. In a formal complaint to President Demirel, the head of the Women Jurists' Association said that "the government is mocking women." ("Candidate with 2 Wives Won't Take Turkey's Ministry of Women Post," *Chicago Tribune*, June 15, 1997).

¹⁵ In the revised code, Algerian women were to be given in marriage by a *wali* (guardian). Provisions for divorce initiated by women were sharply curtailed, as were the restrictions on polygyny; fathers became the sole guardians of children, and women were given an unequal share in inheritance. The only positive aspect of the new family code was that the minimum marriage age was increased for both women and men (to 18 and 21, respectively).

¹⁶ Cited in Mahl [pseudonym], "Women on the Edge of Time," *New Internationalist*, No. 270, via Internet.

¹⁷ Mahl (op. cit.). See also *Women, Law & Development International Bulletin*, January 1998, p. 4.

¹⁸ *Women, Law and Development International Bulletin*, January 1998, p. 4.

¹⁹ Azzedine Layachi, "Algeria: Reinstating the State or Instating Civil Society?" In I. William Zartman (ed.), *Collapsed States: The Disintegration and Restoration of Legitimate Authority* (Boulder, CO: Lynne Rienner Publishers, 1995).

²⁰ The experience of South Africa, which produced a remarkably gender-egalitarian Bill of Rights in 1993, may be relevant. It provides for equal protection for women and men under the law; equal rights within the family; equal rights for women and men in all areas of public and private life; gender rights designed to prevent discrimination on the grounds of gender, single parenthood, legitimacy of birth, or sexual orientation; affirmative action that recognizes race, class, and gender distinctions; support for social and economic rights that, if enforced, would dramatically improve the subordinate socio-economic status of the majority of black women. See Kadalie (1995).

References

- Abu-Zayd, Gehan. 1998. "In Search of Political Power: Women in Parliament in Egypt, Jordan, and Lebanon." in Azza Karam (ed.), *Women in Parliament: Beyond Numbers* (Stockholm: International Institute for Democracy and Electoral Assistance), pp. 43-54.
- Al-Azmeh, Aziz. 1993. *Islam and Modernities*. London: Verso.
- Altorki, Soraya. 1998. "Feminist Groups in Contemporary Egypt." *The Middle East Women's Studies Review* (Winter), p. 15.
- Applewhite, Harriet, and Darline G. Levy (eds.). 1990. *Women and Politics in the Age of the Democratic Revolution* (Ann Arbor: University of Michigan Press).
- Arat, Yesim. 1998. "Democracy and Women in Turkey: In Defense of Liberalism." (Mimeo: Dept. of Political Science and International Relations, Bogazici University, Istanbul).
- . 1997. "The Project of Modernity and Women in Turkey." in S. Bozdogan and R. Kasaba (eds.), *Rethinking Modernity and National Identity in Turkey* (Seattle: University of Washington Press), pp. 95-112.
- . 1994. "Toward a Democratic Society: the Women's Movement in Turkey in the 1980s." *Women's Studies International Forum*, 17: pp. 241-248.
- Bennoune, Karima. 1995. "S.O.S. Algeria: Women's Human Rights Under Siege." In Mahnaz Afkhami (ed.), *Faith and Freedom: Women's Human Rights* (Syracuse University Press.)
- Bouatta, Cherifa. 1995. "Evolution of the Women's Movement in Contemporary Algeria: Organization, Objectives, and Prospects." Helsinki: UNU/WIDER Working Paper No. 124 (February).
- Boxberger, Linda. 1998. "From Two States to One: Women's Lives in the Transformation of Yemen." In Herbert Bodman and Nayereh Tohidi (eds.), *Women in Muslim Societies: Diversity Within Unity* (Boulder, CO: Lynne Rienner Publishers).
- Charrad, M.M. 1997. "Policy Shifts: State, Islam, and Gender in Tunisia, 1930s-1990s." *Social Politics*, vol. 4, no. 2 (Summer): pp. 284-319.
- Cheriet, Bouthaina. 1997. "Fundamentalism and Women's Rights: Lessons from the City of Women." in Mahnaz Afkhami and Erika Friedl

- (eds.), *Muslim Women and the Politics of Participation: Implementing the Beijing Platform* (Syracuse). pp. 2-17.
- Cherifati-Merabtine. 1994. "Algeria at a Crossroads: National Liberation, Islamization, and Women." in V. M. Moghadam (ed.), *Gender and National Identity* (London: Zed), pp. 40-62.
- Connell, Dan. 1998. "Strategies for Change: Women and Political Parties in Palestine." (Mimeo).
- Esim, Simel and Dilek Cindoglu. 1998. "Women's Organizations in 1990s Turkey: Predicaments and Prospects." Paper presented at the annual meetings of the American Sociological Association, San Francisco, CA (August).
- Everett, Jana, K. Staudt and Sue Ellen Charlton, "Conclusion". In Charlton, Everett and Staudt (eds.), 1989. *Women, State, and Development* (New York).
- Jayawardena, Kumari. 1986. *Feminism and Nationalism in the Third World* (London: Zed).
- Kandiyoti, Deniz. 1997a. "Beyond Beijing: Obstacles and Prospects for the Middle East." in Mahnaz Afkhami and Erika Friedl (eds.), *Muslim Women and the Politics of Participation* (Syracuse University Press), pp. 3-10.
- _____. 1997b. "Identity and its Discontents: Women and the Nation". in *Dossier 20*. Grabels, France: Women Living Under Muslim Laws, pp. 7-23 [reprinted from *Millennium: Journal of International Studies*, 20, 3 (1991), pp. 429-43].
- Kadalie, Rhoda. 1995. "Constitutional Equality: The Implications for Women in South Africa." *Social Politics*, 2, 2 (Summer): pp. 208-224.
- Kandil, Amany. 1995. *Civil Society in the Arab World* (Washington, DC: Civicus).
- Kawar, Amal. 1998. "Palestinian Women's Activism after Oslo." in Suha Sabbagh (ed.), *Palestinian Women of Gaza and the West Bank* (Bloomington: Indiana University Press), pp. 233-244.
- Khoury, Rami. 1997. "A Kick in the Pants: Women Call for Democracy." *The Jordan Times*, reprinted in Women's International Net Magazine (December), via Internet.
- Knauss, Peter. 1987. *The Persistence of Patriarchy: Class, Gender, Ideology in Twentieth Century Algeria* (Boulder, CO: Praeger).
- Kruks, Sonia, Rayna Rapp and Marilyn Young (eds.), 1989. *Promissory Notes: Women in the Transition to Socialism* (New York: Monthly Review Press).
- Layachi, Azzedinne. 1995. "Algeria: Reinstating the State or Instating Civil Society?" In I. William Zartman (ed.), *Collapsed States: The Disintegration and Restoration of Legitimate Authority* (Boulder, CO: Lynne Rienner Publishers).
- Lister, Ruth. 1997. *Citizenship: Feminist Perspectives* (London: Macmillan).
- Lorber, Judith. 1994. *Paradoxes of Gender* (New Haven, CT: Yale University Press).
- Marshall, T. H. 1952. *Citizenship and Social Class* (Cambridge University Press).
- Middle East Journal*. 1993. Special issue on civil society in the Middle East. 47, 2 (Spring) (Washington, DC: The Middle East Institute).
- Moghadam, Valentine M. 1993. *Modernizing Women: Gender and Social Change in the Middle East* (Boulder, CO: Lynne Rienner Publishers).
- _____. 1994a. "Introduction: Women and Identity Politics in Theoretical and Comparative Perspective." in Moghadam (ed.), *Identity Politics: Cultural Reassertions and Feminisms in International Perspective* (Boulder, CO: Westview Press), pp. 3-26.
- _____. 1994b. "Introduction and Overview: Gender Dynamics of Nationalism, Revolution, and Islamization." in Moghadam (ed.), *Gender and National Identity: Women and Politics in Muslim Societies* (London: Zed Books), pp. 1-17.
- _____. 1997. "Gender and Revolutions". in John Foran (ed.), *Theorizing Revolutions* (London and New York: Routledge), pp. 137-164.
- _____. 1999. "Revolution, Religion, and Gender Politics: Iran and Afghanistan Compared." *Journal of Women's History*, 10, 4 (Winter): pp. 172-195.
- Naciri, Rabea. 1998. "The Women's Movement and Political Discourse in Morocco." Geneva: UNRISD Occasional Paper No. 8 (March).
- Narayan, Uma. 1997. "Towards a Feminist Vision of Citizenship: Rethinking the Implications of Dignity, Political Participation, and Nationality." in May Lyndon Shanley and Uma Narayan (eds.), *Reconstructing Political Theory: Feminist Perspectives* (London: Polity Press), pp. 48-67.
- Papanek, Hanna. 1994. "The Ideal Woman and the Ideal Society: Control and Autonomy in the Construction of Identity." in Moghadam (ed.), *Identity Politics and Women: Cultural Reassertions and Feminisms in International Perspective* (Westview Press), pp. 42-76.
- Pateman, Carol. 1988. *The Sexual Contract* (Stanford: Stanford University Press).
- Reynolds, Sian (ed.), 1987. *Women, State and Revolution: Essays on Power and Gender in Europe Since 1789* (Amherst: University of Massachusetts Press).
- Shehadeh, Lamia Rustum. 1998. "The Legal Status of Married Women in Lebanon." *International Journal of Middle East Studies*, 30, 4 (November): pp. 501-519.
- Smith, Jackie, Charles Chatfield and Ron Pagnucco (eds.), 1997. *Transnational Social Movements and Global Politics: Solidarity Beyond the State* (Syracuse: Syracuse University Press).
- Yuval-Davis, Nira. 1997. *Gender and Nation* (Thousand Oaks: Sage).
- Yuval-Davis, Nira and Floya Anthias (eds.), 1989. *Woman-Nation-State* (London: Macmillan).