

**Framing Equality: The Politics of Race, Class, Gender in the US, Germany,
and the Expanding European Union**

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The European Union is an unprecedented effort to reshape political relations within as well as across national boundaries. By setting out the *acquis communautaire*, a common set of principles of governance, as the guideline for membership, the EU formulates a certain ideal for a modern, democratic member state. Strikingly, these principles include a significant emphasis on more egalitarian gender relations. This paper explores the notions of gender relations expressed in modern nation-states, using a comparative look at how two modern nation-states, Germany and the United States, define the specific principles of equity in two contrasting ways, and applies this comparative schema to analyze the framework of EU gender relations.

While there are clearly other types, such as the secular social democracy of Sweden (see Hobson and Hellgren in this volume) or the communitarian liberalism of Japan, the contrast between the ways that gender has been understood and women incorporated into the polity in Germany and the United States may be especially illuminating. The German model is more typical of most (but not all) member states of the EU in that social democratic principles are more significant than those of classical liberalism and class relations have played an important role in shaping both feminist movements and state policy. The United States is a helpful model to understand because

it embraces a relatively pure form of liberalism as a political standard and has historically struggled with accommodation of racial and ethnic differences within its understanding of citizenship, an issue that is new but pressing in Europe.

This paper suggests that the EU's own approach to gender equity can be understood as a mixture of these principles as well as of innovative ideas brought in from global feminist mobilizations (Hobson 2003; Verloo, 2005). After exploring the implications of these two models in their own contexts, the paper addresses their specific integration in EU policy models. The conclusion considers the potential problems for women and genuine hope for transformative change in gender relations that the enormous political project of constructing the EU may bring.

The EU expansion to 25 nations – the widening of its scope -- and the more extensive involvement of the EU in matters of daily importance to individual citizens – the deepening of its reach -- has made what was already a large and difficult political matter of European integration even more challenging. Both the widening and the deepening of the competences of the EU have taken it away from the original intent of its founders, as a narrow economic compact among nation-states, and have created something new. This new EU is not a nation or a state. Still, the treaties on which it rests have given it authority as a government to decide and regulate a wide range of matters in this new quasi-entity called “Europe.” It is highly problematic to equate the EU with “Europe” since there are non-member states (such as Switzerland) that are certainly core parts of whatever one imagines Europe to be, and other states that are being considered for membership (e.g. Turkey, see Aldikacti Marshall in this volume) where the definition of being “European” is contested. Nonetheless, the attention paid to “Europe” as a whole

increasingly is focused on the EU as such, whether as a “partner” entity in international relations or as a new transnational type of entity whose practices are important for changing citizenship expectations and identities across both sides of the old East/West boundary of the political imaginary. It is this latter “imagined community” that I consider the “new Europe” being produced in and through the existence and expansion of the EU.

This new Europe is shaped already by the Treaty of Amsterdam that makes equal treatment of women and men a goal. Despite the member states’ failure to so far embrace a common constitution, one which affirms gender equity as a fundamental right, this treaty continues to emphasize the principle of state responsibility for making women citizens on the same basis as men. Specific clauses affirm women’s equal rights and commit the EU to resist and reject gender discrimination (Cichowski 2002; Walby 2004). These clauses would not be there without women’s active lobbying, and their enforcement and elaboration in specific instances -- sexual harassment and gender mainstreaming policies, goals for women’s employment and the provision of childcare, anti-discrimination law – also demand an engaged and active women’s rights policy community (Cichowski 2002; Stratigaki, 2004; Zippel, 2006; Morgan, 2006). Whether the EU will in fact contribute to the fuller realization of gender equity in practice is still very much a work in progress.

But the meaning of gender equity is itself a contested ideal. Historically, as well as today, feminist mobilizations have drawn upon sometimes conflicting discourses of sameness and difference, equality and autonomy, rights and needs, parity of

representation in decision-making and particular accommodation in policy outcomes to shape their political claims.

The shape of such feminist claims-making is formed historically by the opportunities and obstacles with which women have contended in trying to become fully empowered citizens in democratic states (Hobson 2003). These particular structures of opportunity are not merely given by institutional features of states such as party dominance, centralization and state capacity, or welfare regime type, although all of these play important roles. Rather, these institutional features are themselves constructed in the same long-term historical development that has formed gender relations in a particular state in a specific way (Offen 2000; Gerhard 2001). Gender is thus not a side issue brought into the gender-neutral mechanisms of state action, but gender relations are part of the making of democracies from their beginnings and are today part of the construction of the EU as a new system for making European citizens.

Understanding how gender is incorporated in political thought and principles of democratic action as well as in the formal institutions of states, draws analytic attention to how political norms function. The normative quality of politics is expressed in how issues and entities are framed. In this approach to the political process, framing means the process of saying what a political problem is, whose needs are to be addressed and what kinds of solutions are imaginable (Stone 2002, Snow and Benford 1988). Such frames are closely related to the organizational structures and interests that become institutionalized (Ferree 2003). Politics is done with words, but they are not *mere* words.

Framing is an *interactive* process by which actors with agendas encounter specific discursive opportunities in the form of institutionalized texts (Ferree, Gamson, Gerhards

and Rucht 2002). Framing has elements of both agency and structure, and is both enabling and constraining. Active “frame-work” – what feminists, unions, politicians and others actually do to give meaning to an issue – combines with the more passive sense of a “framework” as the institutionalized scaffolding of language imbedded in court decisions and other key texts that produces the effective meaning of a concept such as gender.

Comparative analysis reveals much about how the institutional structure of policy language and the on-going struggles of particular groups to define issues combine to create different meanings for concepts in different contexts (Ferree, 2003). Such path dependent frames both limit and empower political actors, making different strategies more or less feasible. The concept “gender” has different connotations in how citizenship is understood in the US than in Europe, and these differences also change the feasibility of certain types of politics, as the following analysis attempts to show.

Although I focus on differences, there are important commonalities between the US model of gender and the European one, and important differences within Europe as well. As a legacy of 19th and 20th century feminist mobilizations, gender equality has effectively become part of what defines any country or policy as “modern.” This is an important gain. Moreover, in both Europe and the US, the management practices of transnational corporations, international treaties and UN declarations all help to institutionalize new discourses about what is fair, efficient, productive, and reasonable. But they do so against a background of national differences and local struggles in which feminists and others are actively framing concepts such as “gender mainstreaming,” “affirmative action,” “women’s rights,” “equality” and “diversity.” Mieke Verloo (2005)

is directing an important study (MAGEEQ) of such framing in six selected EU member states; see also comparisons of paired states such as Hobson (2003). In this context, both the frameworks in place institutionally and the active framing work of movements matter.

The US framework of gendered citizenship

The United States is well-known as a polity institutionalized along lines of liberal individualism. The claims of classical political liberalism – individualism, self-determination, independence – were institutionalized in the founding documents of the US, which also allowed racist slavery and the domination and virtual extermination of native peoples. For American feminists, organizing a movement to claim women’s rights as citizens has always demanded some choices about how to relate to the political struggle over racialized citizenship, since American nation-building has depended in critical ways on the social construction of “race” as an essentialized form of group difference. The institutionalized practice of importing slaves, the territorial expansion of the United States, which brought in new groups of people already living in these places, and the voluntary immigration of ethnically diverse individuals were all means of expanding the nation. But the definition of who became an American, and on what basis, has always been a process of inclusion on racially unequal terms (Glenn, 2002). Rather than a nation-state built on the imagined homogeneity of its people and the defense of its borders against the “other” as typical of Europe, the racial order of the US has relied on the inclusion but also the subordination of multiple “others” (Collins, 2001). The legality of subordination revolves around the legitimacy of claims to political rights. Since

discourses that justify and challenge racialized differences in status in terms of the prevailing liberal discourse of rights form the master frame for American politics, thinking about race has always offered American feminists an analogy for understanding their own inclusion and subordination.

Consider four different ways the race analogy enters into American thinking about gender and citizenship. First, there is the narrowly political struggle over who within the nation is actually a citizen with rights rather than a political subject and dependent. Women and members of racialized groups are framed as similar in that they are constructed as dependents, and thus not fully rights-bearing individuals (Fraser and Gordon, 1994). Second, because the Declaration of Independence claims that it is “self-evident” and “natural” in how people are “endowed by their Creator” that they should have rights, American movements struggle with the idea of “nature” and “natural difference” as justifications for inequality. Were it not for their “difference,” construed as biological, women and racialized minorities could have equal rights, and so equality and difference are placed in opposition: to claim equality is to deny difference and vice versa (Gamson, 1995; Vogel, 1993).

Third, difference and subordination become packaged together as defining a “natural” hierarchy of merit in the relations of production. Both women and racial minorities are framed as “disadvantaged” by their group membership, and as less able to achieve in what is framed as an inherently fair and yet hierarchical system of competitive capitalism. Thus, affirmative action is understood as an intervention to help those less able to help themselves, and readily extended to other forms of physical or mental “disability” (Bacchi, 1996).

Finally, of course, American women and members of racialized groups have worked together for their rights and have been joint beneficiaries of equal rights politics, from the Civil Rights Act of 1964 to various executive orders promoting the increase of “underrepresented groups” in science, sports and education in general, to court decisions that make gender increasingly a “suspect classification” like race (Lens 2003). Compared to other countries, American anti-discrimination law is strong, broad and enforceable.

The American model has limits, of course. These are most obvious when one compares the apparently self-evident similarity of gender and race in US political discourses to how gender is framed in Germany.

The German model of gendered citizenship

Germany is like many EU member states in that the discursive institutional context for understanding gender has been shaped more by class struggle than by racial privilege. Germany’s liberal revolution failed in 1848 and the bourgeois individual as a politically empowered citizen never became central to German political thought. Instead, the conflict between capital and labor in Germany made it the home of the world’s strongest socialist party at the end of the 19th century, the center of socialist internationalism that took hold by the beginning of the 20th century, and offered even Christian conservatives a practical justification for the welfare state as a means of moderating political tensions and economic inequalities. This also left an important mark on gender relations in German conceptions of citizenship and democracy (Allen, 1991; Gerhard, 2001).

Although in comparison with much of Europe, Germany was more often subjected to authoritarian governments, beginning with the repression of socialism and of all political associations of women in the Prussian state under Chancellor Otto von Bismark at the turn of the previous century, it is similar in that the struggle against social injustice was historically tied to the struggle against political repression and authoritarianism. From the latter part of the 19th century forward, gender was framed as “like class” in demanding voice for the disenfranchised as well as making economic support for the “socially vulnerable” a shared premise for all political actors from left to right of the political spectrum.

Second, unlike class, race in Germany was defined as being about who could belong to the nation and enjoy any rights of citizenship. In this it was similar to other countries in Europe that were defining state boundaries in ethnic terms, as a single “nation” or people. Jewish “otherness” also implied an exclusion from citizenship until, in shocking fashion, Germany under Hitler took exclusion of the “other” to the extreme of genocide. Since “race” means the Holocaust, not subordination within the nation, the ability to see gender as in any way “like race” is limited (Balibar and Wallerstein, 1991; Lutz, 2006).

Third, in the aftermath of World War II, each of the resultant two German states took class politics in different directions. Yet in each newly defined nation-state, class and its relationship to gender was a core part of the political arrangements deliberately being constructed. The ideal worker, the “natural” family and good work-family politics were defined in Cold War terms as opposing images of ideal state-citizenship relations in East and West (Ferree 1995b). The “social market economy” of the West and a

breadwinner-housewife marriage were institutionalized via active state policies (Moeller 1993). The GDR economy and the mother-centered family were both directed through active politics, too (Ferree 1993). This institutionalization of an active welfare state that is intended to align state-family-market relations with an international political order shaped by the Cold War characterizes all European countries after WWII. It is a core aspect of modern gender relations, albeit one that is currently in a state of change (Jenson and Saint-Martin 2004).

Within this framework of political development, the analogy that worked for gender in Germany was class. Drawing on socialist theory, the working class was framed as a social collectivity defined by its relation to production, not by the biological characteristics of individual members, and it won entitlement to have the state respond to needs expressed by a political party on its behalf. Inequalities among citizens were defined from the 19th century on as socio-economic, rather than racialized as biological. Women's status was defined by their relation to the system of reproduction rather than production. Thus the framing of women as mothers was as a *social relation* rather than as a difference among individuals.

In the West German Basic Law of 1949, for example, the principle that women and men are politically equal was explicitly affirmed (in Paragraph 2, Article 3) but this was consistently interpreted as allowing unequal pay, gender-exclusive opportunities and family authority based on a supposedly functional difference between men and women. Both the left and the right attacked what they perceived as the "equal rights" version of feminism and agreed that as mothers, women were entitled to the active protection and

support of the state, just as workers and employers are also entitled to be treated as groups for the purposes of state-led social policy (Moeller 1993).

In the German model, citizens are framed as members of the nation in the context of a socio-economic relation based on gender. Therefore the way the active state draws a line between the “public” matters of production and the “private” relations of family and reproduction is critiqued by feminists as core to the subordination of women (Gerhard 2001). Bringing the private relations of families into the public realm of state intervention – whether in confronting violence or supporting mothers – is critical to European gender politics, which is built on the analogy of class politics as a mobilization to make the state responsible for its citizens, rather than leaving them to the mercy of “private” enterprise. The instrumental uses of gender by the state to protect male power are contrasted with feminist, emancipatory ones. But neither type of gender politics is seen as separate from how the state works to address profoundly *social* relations, which both class and gender are understood to be.

Comparing frameworks between the US and Europe

To sum up, the “framework” for gender institutionalized in the US is not only liberal in its core premises, it privileges a metaphor of gender being “like race.” Seen as a form of second-class citizenship, both gender and race subordinations are effectively challenged by framing that denies the extent and natural basis of any difference from the normative (white male) citizen. A transformative politics of gender is thus one that undercuts the importance of group membership for politics and attempts to help disadvantaged individuals achieve their (presumably biologically given) full potential.

Such a model works very poorly in Germany. Since the racial “other” has been outside the system of citizenship rather than in a specific subordinated position within it, the analogy of gender with race is not particularly helpful to German feminists, or most other Europeans either.¹ However, this absence of resonance may change as the pressure for redefining citizenship in multi-ethnic terms becomes more pressing in Europe (Snow and Corigall-Brown, 2005).

By contrast, seeing gender as “like class” is extremely fruitful in Germany, and in most European states with traditions of social democracy. The gender-class analogy is most problematic in the post-socialist states of Eastern Europe for the same reasons, where socialism as a principle was heavily discredited by its association with repressive authoritarianism and the analogy often functions to create guilt-by-association for feminist policy making.² Organizing women to be a group “for themselves” as well as “in themselves” in the given relations of production and reproduction is a logical strategy that raises little concern about essentializing natural difference, since “women” are like “workers” in being understood as positions in social relations, not so much types of persons. Making claims for social entitlements for mothers, and for women’s power and self-determination in the relations of reproduction, means a struggle to direct state policy to meet the needs women collectively define.

Such an analysis is not particularly useful to feminists in the United States because class differences are accepted as legitimate expressions of innate merit and individual effort. The already weak American welfare state is generally enjoined from acting to undermine what is seen as a functional hierarchical principle of competition. However, the argument that gender is “like race” in distorting the market by producing

discrimination that interferes with honest competition and a true hierarchy of merit resonates powerfully in this framework.

Especially in Western Europe, feminists can use the class analogy to buttress claims for political power on the basis of “parity” in representation. Because the member states of the EU were originally neither democratic nor liberal, political demands for representation have always demanded struggle, and socialist parties were the loudest and leading voice reference. Leaders of socialist parties claimed the right to speak on behalf of all oppressed people. However, the institutionalized left, in challenging state authoritarianism, typically did not open a space for multiple independent critiques but too often defined a single dimension of opposition and sometimes represented it in authoritarian ways. But the unity of the working class as a framework for voicing political opposition also successfully constructed group unity and interest representation as a political demand rather than an appeal to biological similarity. Since the typical European framework for claims of social inequality is class conflict, women’s mobilization as a group, when perceived as “like class,” offers a model of group mobilization that legitimates it, especially in the democratic west, as the logical consequence of a shared social position and a prerequisite for re-shaping the state.

This framework also imposes institutional challenges for feminists. Group needs can be spoken of as legitimate political demands, but class-based mobilizations are far better institutionalized than those of gender and tend to drive organizing into a single left-right dimension. Parties of the left define themselves as able to speak and act for women. The use and misuse of women’s organizations, when women were “instrumentalized” to achieve the party’s goals, made “autonomy” an important issue for feminists in Germany

in the 1960s and in the post-socialist 1990s (Ferree 1987, 1996). Nonetheless, the quality of relationships with the left, with institutionalized political parties and with labor unions remain key issues for feminist mobilization, while these are more marginal issues in US gender politics.³

In sum, the framework of US gender discourse institutionalizes liberal principles and the active framing work of feminists draws an effective policy analogy between women and racial minorities, while EU countries have typically institutionalized a framework for social and political citizenship that affirms class as a model for understanding and addressing social inequalities. European feminists have seized upon this discourse to legitimate their claims to group-based rights. By taking race as a metaphor for gender, American feminists have created a powerful politics of anti-discrimination, and have largely succeeded in institutionalizing this model in law. It makes sense, not only morally but legally, to talk about gender as “like race,” to combine “race and gender” issues, and to construct race-gender political alliances.

However, the framework institutionalized for understanding social inequality in Europe has been historically defined by class, and is only now coming to terms with including racial-ethnic diversity and combating the problems of “second-class” citizenship (see chapter by Hobson/Hellgren in this volume). When they have been able to take class as a legitimate metaphor for gender subordination, European feminists have challenged the boundaries of public and private and brought the inequalities of “private” families under the challenging scrutiny once reserved for the inequalities produced by “private” enterprise. “Social inclusion,” formerly understood solely as a matter of addressing economic marginalization, is re-framed as also implying some means to

mitigate the costs of motherhood (Morgan, 2006). European feminists have thus created a powerful politics of critique, advocacy and representation.

By seeing gender as “like class,” the active role of the state in regulating and reshaping family relations is defined as a legitimate intervention against inequality. The social organization of reproduction in childcare leaves and subsidies, abortion and contraception laws, and affirmative action policies directed at mothers have been increasingly institutionalized.

As this comparison shows, both race-based and class-based gender politics work, but in different ways. The race-based gender politics of the US works against confounding the characteristics of individuals with those of the group and uses state power to allow women more freedom to make “unexpected,” counter-stereotypical choices whether in the market or the family. The class-based gender politics of Germany works against social hierarchies and uses state power to insure that women’s conformity to gender-based expectations in balancing work and family does not generate too much inequality in outcomes.

Because the race analogy challenges stereotypes about women and men as different and addresses barriers to individual opportunity, US women have been able to achieve a considerable amount of success in areas in which individual competition matters. In Germany, anti-discrimination law is notably weak and even more weakly enforced; it has little legitimacy even among feminists as a strategy, does little for addressing gender inequality among women who make the most “expected” choices, and can easily be attacked as only useful to the women who want to be “like men.”

However, in Germany, where the framework of the welfare state situates women as a special group with distinctive interests, feminists have used the analogy with class to claim legitimate representation for women in politics (Stetson and Mazur 1995). Thus there are women charged with representing women's affairs in every city, town and state government (Ferree 1995a). Ministries for women that are supposed to represent women's political interests exist at the state and federal level, and women hold 46% of all ministerial-level positions and are now coming close to half of all elected members of parliament. Germany's most recent federal chancellor, the top political position, is a conservative woman. (Ferree 2006)

Throughout Western Europe, with the class analogy for gender relations, "gender democracy" is seen as a new parallel to "social democracy" and parity of political representation is a legitimate concept (Freedman 2004; Lovecy 2000). Lacking this group-centered discourse, the US falls well behind most European countries in its share of women in elected office. In the 2004 US Congress, women are just under 15% of the representatives (15% and 14% respectively in the Senate and House) and women hold only 25% of statewide executive roles. Political roles are understood as solely individual achievements, and the obstacles to women winning the financial and organizational support for top offices are still formidable.

Because both liberal and social democratic frameworks for gender have already been challenged and modified by feminists – not only in this current wave of mobilization, but from the earliest stages of democratic state formation – the institutional politics of gender today present embedded opportunities on which activists can continue to build as well as obstacles that still need to be addressed in each system. Full

citizenship for women remains a goal rather than an achievement in either case, but the available tools for the necessary activist frame-work also differ.

The hybrid EU political model of gender

The European Union offers a still-developing field of political action for feminist framing work. Formed initially as a mere common market, the EU began from classical liberal principles of competition and a limited role for the state. Yet the initial member states of the EU embraced the goal of a “social market economy” that would apply social democratic principles of regulating private enterprise to ensure the common good and actively reduce inequality. Pushed and pulled between such frameworks, the EU is potentially open to US-style liberal antidiscrimination politics that would invoke a race analogy as well as to more typically European class-style gender politics that privilege women’s self-representation in politics, foster active support for balancing work and family, and legitimate targeting benefits to mothers no less than to “workers” on the basis of their social needs.

The EU’s own gender politics have already shown signs of accommodating both approaches. Feminist activists working within the framework of the EU have increasingly taken a dual-action approach (Zippel 2006). The hybridity of the EU as a novel form of governance, linking both national and transnational decision-makers, may be especially suitable to a politics of gender that defines citizenship simultaneously in more than one framework. Yet the hybridity of the EU model does not only represent an opportunity for progress but also a range of possible new obstacles for women who wish to claim full citizenship rights.

Social actors engaged in these definition struggles include social movements, interest groups, states and parties, media. When talking about gender at the EU level, however, the actors who are privileged are those of the European Commission and its diverse executive offices, the European Women’s Lobby as a commission-funded umbrella organization of national European women’s organizations, the member states who enter into or reject treaties, and the European Court of Justice, which decides on the applicability of EU law and mediates conflicts between national law and EU mandates (Cichowski 2002). The framing of gender emerging at the EU level as articulated by these various actors reflects the hybridity of the frameworks available to them, but also serves to challenge old frameworks and begin to institutionalize new ones. Table 1 presents a summary of this hybrid model.

[put Table 1 about here]

In this table, the two primary dimensions are the non-gender-specific institutional *framework* for policy-making (either predominantly liberal or social democratic principles) and the gender-specific analogy made with either race or class in the *framework* done by engaged social actors. In each cell, the emphasized aspects of gender relations are summarized and the terms that can be used discursively to most effect are in each case highlighted. The positive and negative interactions between the institutionalized frame for equality and the active framing of gender in analogy to race or class can thus be examined more closely. I highlight first the “concordant” cells in the upper left (liberal/race) and lower right (socialist/class) and then the discrepant ones in the lower left (liberal/class) and upper right (socialist/race).

In the top-left cell, in liberal market-led structures that define the EU's formal competences, the race metaphor provides a supportive opportunity structure for talking about "diversity" as a goal. In this context it is both efficient and appropriate to extend the language of rights to encompass respect for "individual differences" – which is what race and gender are conceptualized as being – and thus to dismantle group stereotypes and strive for an open process. Thus it is not surprising that there is a great deal of talk in EU circles about diversity, including borrowing the idea of "managing diversity" from the US, as Alison Woodward (2004) has shown. Her many pictures illustrate forcefully how widely the image of gender and race "diversity" is institutionalized in EU materials.

This language and imagery redefines gender equality as something good for both individual citizens and for the corporate bottom line, but it says little about social justice. Adaptation to a "changing workforce" and to "global competition" makes "valuing diversity" a tool for increasing corporate profitability by better fitting competition into actual market conditions, rather than a matter of citizenship and rights (Edelman, Fuller and Mara-Dritta, 2001).

The second productive and powerful framing draws on the synergy between the social democratic framework of member states and the discourses of class for framing women's special needs for both protection and representation, as depicted in the lower right-hand cell of Table 1. As positions in production and reproduction, gender and class constitute formative social relations that entitle women and the working class to claim particular rights. Institutionalizing rules for gender parity within legislatures, commissions and courts can be legitimated as part of how women claim their own voice in the EU system. Unlike the classic social democratic parties as representatives of

workers' special interests, women are expected to represent themselves within the various mass parties as well as autonomously as a group in relation to EU administrative decision-making.

The European Commission's funding for the European Women's Lobby (EWL) reflects the definition of women as a group with special collective interests whose representation as such lends legitimacy the EU system as a whole (Cichowki 2002). The EWL is made up of quite mainstream groups with modest and often stereotypical goals, but is accorded policy influence in "representing women" (Williams 2003). Additionally, the resonance of the class analogy with the institutional politics of gender at the member-state level provides useful tool at the EU-level, since EU-level gender equity advocates can use their gains at the national level to pressure the EU decision-makers to respond to women's claims, as well as vice-versa (Zippel 2004).

Such political effectiveness in pushing particular policies "on behalf of women" may be diluted, many feminists fear, if gender mainstreaming places the authority for deciding what is in the interests of women in the hands of bureaucrats insensitive to the ramifications of gender in women's lives (Verloo 2005). Yet a very considerable advantage to gender mainstreaming is that by treating not just persons but policies and objects as gendered, every issue can be considered for its impact on both women and men (Roth 2004). The institutionalization of "gender training" as part of the mainstreaming process can also be thought of as institutional-level consciousness-raising about the implications of gender. Developing gender mainstreaming in a way that respects the feminist knowledge base about gender relations in designing programs preserves the transformative mission of feminist advocacy politics. Although encouraging the diffusion

of responsibility of working for gender equity throughout the state is no simple task, the EU's official endorsement of gender mainstreaming is a rhetoric that opens a door for party and pressure group activity within the system.

Invoking a class analogy is also productive for women political activists within the EU because it unsettles the identification of systems of oppression with defense of the interests of the presumably male industrial worker. Not only are such workers an ever smaller share of the labor force, but the use of class-and-gender claims has expanded domain of concern from the shop-floor to a broader range of family, community and social issues. The classic "social inclusion" language of social democracy is being more often extended to "new risk groups" like single mothers, poorly educated minority women and part-time workers (Jenson and Saint-Martin 2004). New issues are also being promoted as economic in nature. For example, networks formed around specific issues such as sexual harassment and domestic violence are successfully framing these issues as costs to employers in the loss of women's productivity and thus warranting EU interventions (Walby 2004). Women have emerged within the EU as self-representing political actors to an unprecedented degree, and while there is still a considerable distance to go to achieve parity or truly mainstream attention to gender equity in policy making, the strides taken in just a few decades are impressive.

Turning now to the discrepant cells, the framing of gender as "like class" will have less positive resonance in relation to the EU's own liberal framework, as the lower-left cell of Table 1 indicates. Institutionally framing economic competition and individual merit as the principles that must underlie women's position, once all discrimination is cleared away, leaves no place to acknowledge children except as a "choice" and makes

the disadvantages childrearing brings seem individual consequences of a personal decision, rather than structural features of a system. Since liberal political principles accept the legitimacy of market-based hierarchies among individuals and groups on the grounds of differences in achievement, the language of competition and merit tends to make workplace inequalities seem to follow “naturally” from the gender division of labor outside the workplace and so “fair” (Verloo 2003). Since the goal of EU politics is to support the market and its supposed efficiency, interventions in gender systems that are framed as not about enhancing competition are seen as illegitimately bringing in “less qualified” people as workers or students. Because this is a “market-led” model, all “private” inequalities of gender like those of class, remain silent forces, difficult to name critically and thus largely outside the bounds of “public” or state-led remediation.

The discrepant combination of talking about gender in relation to and by analogy with race in a social-democratic discursive framework is depicted in the upper-right cell of Table 1. Insofar as the EU attempts to deal ethnic diversity at all, it does so in encouraging open borders and social equality for its citizens, but allows this state-led policy framework to exclude from concern those who are positioned outside the borders of the “community” and without attention to the processes of racialization that create “second-class citizens” within the EU (Knocke 2000, Agustin 2004). Because the EU member states have long construed race and ethnicity as being a “secondary contradiction” and divisive element, the discussion of group loyalties and of socio-economic differences by ethnic or religious membership have been intentionally suppressed. In such a context, calling attention to “race” unleashes unspoken

animosities; political parties that make it an issue are, with reason, seen as frightening. To talk in racial terms is to talk about exclusion.

Such racialized language is available for gender politics when it allows the speaker to highlight “the other,” the “non-European,” as the well-spring of patriarchy. In this discourse, the way to eradicate patriarchal institutions is to forbid them legally and thus “exclude” them from the domain of citizenship. Many EU member states have attempted to do just this by focusing on wearing a headscarf as a distinctive symbol of “private,” religiously based patriarchy and then excluding the veiled women from various citizen rights in employment, education, or politics. By attempting to drive patriarchal relations of “the other” out of the public sphere, these policies make their own patriarchal practices invisible, defining “European women” as simultaneously “white,” “liberated” and “privileged” in contrast to the other (Agustin 2004).

Tying race and gender together, by framing those “outside” the EU as less “modern” and thus less equal in their gender relations than those “inside” Europe, leads to absurdities such as the denigration of the newer members of the EU from Central and Eastern Europe as inherently more “backward” and less “modern” in their gender relations than the older member states, as Eva Fodor (2005) has tellingly demonstrated in her comparison of the language applied to “Eastern” and “Western” European issues for women in UN and EU documents. By objective measures of education, employment, and family power women in the accession states experience more gender equity than their West European counterparts, but the framing device of “backwardness” allows the discussions of the status of women to revolve not around women’s real social position but

the perceived level of “Europeanness” – variable levels of EU citizenship among the member states.

Conclusions

The implications of this analysis for the prospects for gender equality in the hybrid model of the EU suggest caution but not cynicism. As in the US, the market orientation of the EU creates a productive synergy between liberalism and use of the race analogy, encouraging not merely the de-politicizing language of “diversity,” but a raft of strong anti-discrimination measures embedded in law and embraced by “private” industry. Activists using anti-discrimination laws and policies can bring in authentically competitive mechanisms to institutions like universities that have operated like exclusionary old-boys clubs. Formal tests and open searches could be good for women candidates, who have shown in systems like the US that they can indeed compete with men. Women activists have also used the heritage of social democracy effectively to pressure EU governance structures to strive for “parity” of representation in electoral and party politics as well as for “gender mainstreaming” and interest group representation in administrative decision-making. Feminist advocacy networks at the EU level have been empowered, even as grassroots service projects in member states have faced ever more severe budget cuts.

The challenge is to resist the threats to women’s equality and autonomy posed on the one hand, by the class-based language of competition and merit as “explaining” away the costs of unpaid carework socially assigned to women and on the other hand, the race-based language of exclusion and “othering” that makes patriarchy in Europe someone else’s problem. For example, migrant groups and women’s groups can cooperate to

support new associations of migrant women making classic claims for social inclusion (Williams 2003). The use of gender relations as an indication of modernity can even be framed as a challenge from new, post-socialist member states to the “old” members finally to modernize their gender relations (Roth 2004).

While the hybridity of the EU structure offers a potentially valuable “ping-pong effect” between national and transnational actors (Zippel 2004), the complexity of the new discursive space thus opened up includes significant dangers as well. Women, especially mothers, can appear in the more neo-liberal discourse of the EU as “uncompetitive” and as less valuable. The scaling back of the welfare state that the EU has encouraged in the name of market efficiency poses a great danger to social inclusion as a policy goal. Because women are disproportionately poor and dependent on state assistance, especially as mothers, this turn toward a neo-liberal institutional framework will jeopardize their actual well-being as well as making it harder to frame effective opposition to such policies.

Women’s strong representation in political parties and government offices is a tremendous political resource, but it does not overcome the limits of party discipline nor necessarily give women equal voice with men in shaping the agenda of the party as a whole. Moreover, the bureaucratic, top-down decision-making that characterizes EU policy-making lessens the role of electoral accountability and competition for women voters. Gender mainstreaming could become an administrative fig-leaf over the absence of actual policy pressure for gender equity (Verloo, 2005).

However, the hybridity that the EU represents in relation to gender, race and class has possibilities. A liberal and narrowly economic definition of citizenship does not exist

in hegemonic position, as in the US, but is being integrated with the social and democratic aspirations of the European states that are its members. This could present new opportunities for gender politics. The terrain of the EU could be as promising as its potential suggests or as dangerous as the sum of its risks.

As the EU both widens in scope and deepens in its reach into more and more areas of policy, the actual outcomes for women may well depend on the vigor and effectiveness with which organized efforts to frame gender equity issues develop. Because the EU still has the status of an experiment in the making, the energetic use of effective frames by feminist advocacy networks may well turn out to be the key factor explaining whether the more optimistic or the more pessimistic scenario prevails.

Table 1

**The Interactions of Institutional Frameworks and Activist Framing
Shaping EU Gender Politics**

	Institutionalized Framework for Political Decision-making	
Active Framing of Gender Politics:	Liberal framework	Social democratic framework
Ideas and terms privileged by analogy with race	Individual difference and rights, group stereotypes block individual choice, distort markets, focus on changing private industry “diversity” “diversity management”	Secondary (and divisive) group differences, redistribution-led politics for all citizens, but only for citizens “social inclusion” “borders/exclusion”
Ideas and terms privileged by analogy to class	Market-based hierarchy based on achievement, production-led politics fosters winners and losers inside the system “competition” “merit”	Party-based representation, autonomous voice of group represents needs electorally and in administrative office, focus on changing government practices “parity” “gender mainstreaming”

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Endnotes

¹ Despite recent changes not only in Germany but throughout Europe more readily to offer immigrants citizenship, an institutionalized “second-class citizenship” by racial/ethnic origins that characterizes the US is not (yet) a part of the European experience.

² The complexity this introduces into feminist organizing in unified Germany, trying to develop appeals to both sides of the German experience, is something I have dealt with in other papers. See for example, Ferree 1993 and 1995b.

³ Insofar as feminism has become identified with the Democratic Party in the US, this is likely to change. But such partisan alignment is relatively recent in the US, and the Democratic Party is still far from being a “left” party in European terms.