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**NAVIGATING WOMEN'S ACTIVISM IN MOROCCO AND
TÜRKİYE: GLOBAL AND TRANSNATIONAL ENGAGEMENT
(1975-2004)**

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GLOBAL AND TRANSNATIONAL ENGAGEMENT (1975-2004) ADI**

2025

TAAHHÜTNAME

Bu tezin Manisa Celal Bayar Üniversitesi Lisansüstü Eğitim Enstitüsü Siyaset Bilimi ve Uluslar Arası ilişkiler Ana Bilim Dalında akademik ve etik kurallara uygun olarak yazıldığını ve kullanılan tüm literatür bilgilerinin referans gösterilerek tezde yer aldığını, tamamen kendi çalışmam olduğunu, her alıntıya kaynak gösterdiğimi, tezin yazımında akademik ve etik kurallara aykırı herhangi bir yapay zeka ve program kullanmadığımı beyan ederim.

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ABSTRACT

M.A. Thesis

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The principal objective of this thesis is to comparatively examine women's activism, policy advocacy, and legal reform in Morocco and Türkiye from 1975 to 2004, a period deeply influenced by the United Nations (UN) Decade for Women and the increasing engagement of both countries with global feminist frameworks. The central research question explores how global and transnational feminist engagements, particularly those initiated by the United Nations Decade for Women, shaped strategies, outcomes, and challenges in women's movements and legal reforms in both countries. By drawing on the dual frameworks of legal pluralism and transnational feminism, the study analyzes how international norms were received, adapted, and negotiated within distinct national and local contexts. The analysis is based on both primary official reports and secondary academic sources and employs a comparative, qualitative methodology to trace similarities and differences in policy outcomes, advocacy strategies, and the ongoing challenges of legal implementation. The findings indicate that, while both countries achieved significant legal reforms through women's activism and global engagement, the full realization of women's rights remains hindered by persistent social, political, and legal obstacles, including the complexities of legal pluralism and the gap between statutory change and lived realities. The thesis concludes that future progress requires more inclusive and locally attuned advocacy, as well as further research that centers grassroots and marginalized voices.

Keywords: Morocco, Türkiye, Women's Activism, Women's Rights, CEDAW, Family Law Reform

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ÖZET

Yüksek Lisans Tezi

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Bu tezin temel amacı, 1975–2004 döneminde Fas ve Türkiye’de kadın aktivizmi, politika savunuculuğu ve hukuki reform süreçlerini karşılaştırmalı olarak incelemektir. Bu dönem, Birleşmiş Milletler (BM) Kadın On Yılı’nın etkisi ve her iki ülkenin küresel feminist çerçevelerle artan etkileşimi bağlamında ele alınmaktadır. Çalışmanın temel araştırma sorusu, özellikle BM Kadın On Yılı çerçevesinde gelişen küresel ve ulusötesi feminist etkileşimlerin, her iki ülkede kadın hareketleri ve hukuki reform süreçleri üzerindeki etkilerini analiz etmektedir. Hukuki çoğulculuk ve ulusötesi feminizm kuramsal çerçevelerine dayanan çalışma, uluslararası normların farklı ulusal ve yerel bağlamlarda nasıl benimsendiğini ve dönüştürüldüğünü incelemektedir. Analiz, birincil resmi raporlar ve ikincil akademik kaynaklara dayalı karşılaştırmalı ve nitel bir yöntemle yürütülmüştür. Bulgular, her iki ülkede de kadın aktivizmi ve küresel etkileşimler yoluyla önemli hukuki reformlar yapıldığını ortaya koymaktadır. Ancak toplumsal, siyasal ve hukuki engeller, özellikle hukuki çoğulculuk ve yasalar ile gündelik pratikler arasındaki mesafe, kadın haklarının tam anlamıyla kullanımını sınırlandırmaktadır. Tez, gelecekte anlamlı bir ilerlemenin, daha kapsayıcı ve yerel dinamiklere duyarlı savunuculuk biçimlerinin geliştirilmesi ve sesi yeterince duyulmayan kadın deneyimlerini merkeze alan araştırmaların arttırılmasına bağlı olduğunun altını çizmektedir.

Anahtar Kelimeler: Fas, Türkiye, Kadın Aktivizmi, Kadın Hakları, CEDAW, Aile Hukuku Reformu

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LIST OF ABBREVIATIONS

ADFM	Association Démocratique des Femmes du Maroc
AKP	Adalet ve Kalkınma Partisi (Justice and Development Party)
CEDAW	Convention on the Elimination of All Forms of Discrimination Against Women
CSW	Commission on the Status of Women
ECOSOC	Economic and Social Council
EU	European Union
FAO	Food and Agriculture Organization
GA	General Assembly
ILO	International Labor Organization
INSTRAW	United Nations International Research and Training Institute for the Advancement of Women
IPU	Inter-Parliamentary Union
MENA	Middle East and North Africa
NGOs	Non-Governmental Organizations
TKB	Türk Kadınlar Birliği
UAF	Union de l'Action Feministe
UN	United Nations
UNDP	United Nations Development Programme
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNIFEM	United Nations Development Fund for Women
USAID US	Agency For International Development
WHO	United Nations Commission on the Status of Women

TABLE OF CONTENTS

ABSTRACT	ii
ÖZET.....	iii
ACKNOWLEDGMENTS	iv
LIST OF ABBREVIATIONS	v
TABLE OF CONTENTS.....	vi
1. INTRODUCTION.....	1
1.1. Studies on Women’s Activism, Policy Advocacy and Legal Reform in Morocco	5
1.2. Studies in Turkish Women’s Activism, Advocacy and Legal Reform	7
1.3. Gaps in Existing Research and Justification for Comparative Study.....	11
1.4. Theoretical Framework	12
1.5. Sources, Methodology and Organization of the Thesis	18
2. THE UNITED NATIONS AND THE EMERGENCE OF GLOBAL GENDER NORMS.....	21
2.1. The Origins of United Nations	21
2.2. The Yalta Conference and San Francisco Conferences (1945).....	22
2.3. The Preparatory Commission and First Session	24
2.4. The Structure and Organs of the United Nations	25
2.5. United Nations and Women (Pre-1975).....	28
2.6. International Women’s Year and The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).....	30
2.7. Mexico City Conference, 1975 and the Declaration of the Decade (1976-1985).....	32
2.8. The Creation of UN Bodies and Institutional Support.....	33
2.9. Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW).....	34
2.10. The Copenhagen Conference (1980).....	36
2.11. The Nairobi Conference (1985)	38
2.12. The Beijing Platform for Action (1995).....	40
3. MOROCCAN WOMEN’S ACTIVISM, GLOBAL FEMINIST ENGAGEMENT AND OUTCOMES (1975–2004).....	43
3.1. Socio-Political Landscape from Post-Colonial Period to (1975).....	43

3.2. Early Moroccan Feminist Movements and the Influence of the UN Decade for Women (1975–1985).....	45
3.3. Moroccan Feminist Movements’ Participation in Global Feminist Networks	47
3.4. Role of International Organizations (UN Agencies and NGOs) in Supporting Moroccan Feminist Movements	50
3.5. Policy Advocacy and Legal Reform Outcomes (1975–2004).....	52
3.6. Limitations of Policy and Legal Advocacy in Morocco (1975–2004).....	55
3.7. Local Resistance and Challenges in Implementing Reforms	57
4. TURKISH WOMEN’S ACTIVISM, GLOBAL FEMINIST ENGAGEMENT AND OUTCOMES (1975–2004)	59
4.1. Socio-Political Changes from the Late Republican Era to (1975)	59
4.2. Turkish Feminist Movements and Responses to Global Initiatives During the UN Decade for Women (1976-1985).....	60
4.3. Role of International Organizations (UN Agencies and NGOs) in Supporting Turkish Feminist Movements.....	64
4.4. Legal Reform Outcomes (1975–2004).....	66
4.5. Challenges in Feminist Legal and Policy Reform in Türkiye	68
4.6. Societal and Political Backlashes Against Feminist Activism.....	71
5. A COMPARATIVE DISCUSSION OF MOROCCAN AND TURKISH WOMEN’S ACTIVISM	73
5.1. Comparative Summary of Findings	73
5.2. Similarities and Differences in Policy and Legal Outcomes.....	75
5.3. Assessment and Further Implications	77
5.4. Limitations of the Research and Suggestions for Further Studies	80
6. CONCLUSION.....	81
REFERENCES.....	85

1. INTRODUCTION

The period from the mid-1970s through 2004 marked a critical era for women's activism in Muslim-majority societies, as transnational feminist agendas and local reform movements intersected to reshape gender norms, policy advocacy, and family law. In both Morocco and Türkiye, the United Nations Decade for Women (1975–1985) catalyzed the formation of new feminist networks and provided opportunities for engagement with international frameworks such as the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and the Beijing Platform for Action, laying the groundwork for significant legal and policy reforms in both countries. Despite the apparent convergence in global engagement, the trajectory and effectiveness of women's movements in both countries reveal key differences rooted in legal traditions, political structures, and the negotiation of global and local norms and similarities in society resistance to change and gender equality discourse. This thesis seeks to comparatively analyze how global and transnational feminist engagements, particularly those initiated during the United Nations Decade for Women, shaped women's activism and legal reforms in both countries up to 2004. Specifically, it addresses the following research question: How did global and transnational feminist engagements initiated during the UN Decade for Women influence policy advocacy and legal reforms within women's activism in Morocco and Türkiye up to 2004? Subsidiary questions focus on the mechanisms of engagement, similarities and differences in policy outcomes, and the ongoing challenges of implementation.

The theoretical framework for this study draws on Legal Pluralism and Transnational Feminism. The concept of classical legal pluralism initially emerged from studies of colonial societies, where imperial powers imposed centralized, codified legal systems upon communities governed by customary and religious law (Merry, 1988). This “classical” understanding is evident in Morocco, where Islamic principles continue to govern family law through the *Mudawana* (Family Code), while secular, French-derived civil codes regulate other legal domains. While this classical understanding of legal pluralism clearly applies to Morocco, a different form of pluralism can also be observed in non-colonial and industrial societies. Sally Engle Merry (1988) introduced a redefinition of the concept, arguing that plural normative

orders are not limited to colonial situations but exist in virtually all societies (p. 873). She explains that even where a centralized legal system is dominant and formally uniform, other systems of social regulation continue to operate “in its shadows” (p.874), and influence how law functions in practice. In this new legal pluralism, attention shifts from separate systems of state and folk law to the interaction between official and unofficial forms of ordering within the same social field. This aligns with what Yeşim Arat (2010), Feride Acar & Gülbanu Altunok (2013), and Deniz Kandiyoti (1988) portray in their work as the premise that social life is regulated by patriarchal norms, religious traditions, and customs, often operating outside or alongside formal state legal institutions, which shows how formal equality before the law coexists with informal moral and customary orders that continue to govern family relations and women’s rights. Transnational feminism complements this by highlighting the relational, negotiated nature of feminist activism across borders and the crucial role of cross-border alliances, international funding, and global norm circulation in enabling local reforms. Both theories help make sense how local activists have strategically adapted international frameworks, such as CEDAW and the Beijing Platform, while negotiating the constraints and opportunities provided by their national contexts.

This research adopts a comparative, qualitative methodology based on primary official reports and secondary academic sources, synthesizing leading scholarship on women’s movements, gender-equality reforms, and international engagement in both countries. The selection of Morocco and Türkiye is driven by the analytical value of comparing two Muslim-majority societies that pursued legal and social reform under very different historical, political and legal configurations. Both countries engaged with global gender-equality frameworks emerging in the mid-1970s and both undertook major gender-equality related reforms by 2004, yet their trajectories took different directions. Morocco represents a post-colonial hybrid monarchy in which Islamic jurisprudence retained formal authority over family law, whereas Türkiye embodies a post-ottoman secular republican model that abolished Islamic family law in 1926 but continued to grapple with deeply rooted patriarchal norms in practice. These structural contrasts, paired with shared pressures from transnational feminist agendas, make the two cases highly productive for examining how global feminist norms were negotiated, adapted, and contested across different political and legal landscapes. The comparison also reveals a significant temporal asymmetry in their

engagement with international feminist actors. Türkiye's involvement in transnational women's networks predates the United Nations Decade for Women; early Republican organizations participated in the International Woman Suffrage Alliance congress in Istanbul in 1935 and later reconnected to European networks through the International Council of Women in the 1950s (Libal, 2008). Morocco, by contrast, entered the transnational feminist arena much later during the United Nations decade for Women. Prior to 1975, women's activism in Morocco was state led largely embedded in independence struggle, national building and union movements (Brand, 1998). Its substantive engagement with international gender frameworks, CEDAW, the UN Decade for Women, Nairobi 1985, and later Beijing, emerged primarily in the late 1970s and 1980s (Brand, 1998). This asymmetry provides an analytically rich entry point for understanding how different historical starting points shape the adoption and domestication of global gender norms.

The time frame of 1975 to 2004 is chosen deliberately. The year 1975 marks the beginning of the UN International Women's Year and the launch of the UN Decade for Women, which dramatically expanded the institutionalization of global feminist norms and created new channels through which activists in both countries articulated their demands. Although Turkish women's organizations had engaged internationally prior to this period, the Decade provided a formalized global arena that reshaped and reinforced both states' commitments and feminist strategies. The end point of 2004 corresponds to the most consequential legal reforms in both countries: the revised Mudawana in Morocco and the civil and penal code reforms in Türkiye. After 2004, new dynamics, particularly European Union accession conditionality in Türkiye (the process through which the European Union requires candidate states to adopt specific political, legal, and human-rights reforms, including gender-equality provisions, as conditions for accession negotiations) and post-Mudawana political shifts in Morocco, introduce analytically distinct pressures that fall outside the scope of this study. Focusing on 1975–2004 allows for a coherent comparative analysis grounded in United Nations-led transnational women's movement initiatives. The need for sufficient time is repeatedly emphasized in law- and policy-focused scholarship, as the implementation of reforms, especially those addressing deeply embedded social issues such as gender equality, is understood to be a prolonged, iterative process. Translating legal change into lived reality requires not only the formal adoption of new rules but

sustained oversight, monitoring, and reinforcement across several years. For instance, major legal-equality bodies emphasize that adopting gender-equality laws are only the first stage; as Akhmetova et al. (2020) show in a cross-national study of legal reform for women's economic empowerment, without sustained enforcement and monitoring the impact remains limited. The Council of Europe's practical guide on gender-mainstreaming in public and private law reform (2021) and UN Women's handbook on gender-responsive law-making (2021) both highlight the need for implementation, oversight and evaluation over time. Accordingly, in this thesis, the analysis of legal reform is confined to the measures adopted during the defined period of 1975–2004, with particular focus on the major reforms enacted in Morocco (2004) and in Türkiye (2001–2004). To evaluate whether these reforms translated into changes in lived realities and shifts in gender inequality, it is necessary to examine the earliest authoritative assessments of their implementation. These assessments are provided not immediately after the reforms, but several years later through the first available CEDAW Concluding Observations about the implementation evaluation; 2008 for Morocco (CEDAW/C/MAR/CO/4) regarding the Mudawana reform and 2010 for Türkiye (CEDAW/C/TUR/CO/6) regarding both reforms (2001–2004). Accordingly, the implementation window of 2004–2010 is adopted in this thesis to capture the initial post-reform outcomes as documented by the CEDAW committee, without extending the analysis into subsequent political periods or later reform cycles.

Key findings reveal that while both countries achieved notable legal reforms, including the Mudawana overhaul (2004) in Morocco and civil and penal code reforms in Türkiye (2001–2004), the realization of women's rights remains incomplete. In both cases, legal pluralism, whether *de jure* that manifests in societal traditional orders or *de facto* like in the case of Morocco, continues to produce barriers to effective implementation, particularly in rural and conservative regions. Activists and scholars alike stress that legal change is only the starting point; real progress depends on the transformation of attitudes, education, and grassroots advocacy, a lesson encapsulated in the words echoed by grassroots leaders such as Leila from Jussūr as noted by Zakia Salime (2011) in her work. Moreover, the findings suggest that sustained engagement with transnational feminist networks has amplified the advocacy capacity of local actors, offering both policy models and international legitimacy, but has also necessitated ongoing adaptation and localization of global norms. Differences persist

that Morocco's reforms were closely tied to Islamic legal frameworks and royal authority, while Türkiye's secular legal tradition and societal traditional ordering and customs shaped both opportunities and setbacks in the implementation of gender policy.

The implications of this study reach beyond the specific cases of Morocco and Türkiye. They point to the necessity of inclusive, locally attuned advocacy that bridges the gap between statutory change and lived experience. They also call for further research that goes beyond national and elite actors to include the voices and agency of rural realities, minority, and grassroots, as well as going through the more recent developments post 2004.

1.1. Studies on Women's Activism, Policy Advocacy and Legal Reform in Morocco

The evolution of Moroccan feminist movements is illuminated by a rich body of scholarship highlighting the interplay of local traditions, linguistic and regional diversity, and global influences. Fatima Sadiqi (2006, 2008, 2014, 2016) stands out for her analysis of the movement's roots at the intersection of secular, Islamic, and Berber identities. She emphasizes both the historical agency of Berber women and the chronic marginalization of rural and illiterate women in mainstream feminist projects, calling for a more inclusive "larger-than-Islam framework." Moha Ennaji (2010, 2016) develops this theme by examining how gender, language, and identity politics intersect to create new forms of activism, noting the diversification of Feminist movements since the 1990s and their increasing professionalization. Amy Y. Evrard (2014) contributes a nuanced critique, demonstrating the diversity of actors, motivations, and pragmatic strategies within the so-called "women's rights movement." Evrard urges researchers to look beyond the label "feminist," acknowledging a flexible coalition that includes secular, religious, urban, and rural women. Zakia Salime (2011) challenges simple binaries, showing how Moroccan feminist and Islamist movements often engage in "boundary work"—borrowing tactics and rhetoric from one another, and strategically navigating contested terms like "feminism." Salime's work, together with Sadiqi and Ennaji, highlights the ongoing negotiation between urban and rural, elite and grassroots perspectives, and underscores the persistent challenge of representing all Moroccan women. Mounira Charrad (2001) offers a comparative North African perspective, situating Moroccan feminism within state-building

processes and kin-based social structures. She draws attention to how kin-based solidarities and state, tribe alliances shaped Morocco's adoption of a conservative family law after independence. Finally, Katja Žvan Elliott (2014; 2015) critically assess the ongoing gap between legal reform and the realities faced by ordinary women highlighting the inadequate fulfillment of obligations to international human rights standards, and the state's role in shaping women's. While Bohdana Dimitrovova (2010) explores the dynamics of civil society-state relationship relative to women's rights during 1990's.

The relationship between Islamic tradition and feminist activism forms another central theme in Moroccan scholarship. Zakia Salime (2011) and Fatima Sadiqi (2014) both documents how secular and Islamic feminists in Morocco have strategically drawn on Islamic language and references to broaden support and counter accusations of Westernization. Their research illustrates the adaptability of Moroccan feminist discourse, particularly during landmark campaigns such as the 2004 Mudawana revision, where broad coalitions of secular and Islamic feminists united for reform. However, this discursive flexibility also carries risks. Osire Glacier (2013) argues that when gender reforms are framed primarily through religious discourse, they risk reinforcing existing patriarchal structures unless anchored in genuine commitments to universal human rights and citizenship. Taken together, these scholars highlight the dynamic negotiation between religious and secular paradigms, and the necessity of contextually grounded strategies that challenge gender hierarchies without reinforcing new forms of exclusion. Women's NGOs and associations stand at the center of a substantial body of scholarship, which emphasizes their pivotal role in driving both legal and social change. Ennaji (2016) notes that women's NGOs in Morocco expanded significantly in the 1990s and 2000s, becoming more structured and active in filling state-generated gaps through education, legal support, and social services, while also pushing for gender reforms and political participation. Valentine M. Moghadam (2014) offers a typology of women's NGOs in the Middle East and North Africa including Morocco and raises concerns about "NGO-ization," where priorities may shift in response to donor agendas, sometimes at the expense of grassroots engagement. Amy Evrard (2014) documents the creative strategies NGOs use to navigate restrictive environments and public skepticism, emphasizing their success in weaving together local and transnational resources.

According to Sadiqi (2008, 2014), and Evrard (2014), key legal reforms, most notably the 2004 Mudawana, were made possible by coordinated campaigns involving local NGOs, grassroots organizations, international actors, and monarchy. Yet, as Katja Žvan Elliott (2015) and Yasmine Berriane (2015) caution, legal achievements on paper do not always translate into substantive gains, especially for rural or marginalized women. They point to the persistence of patriarchal institutions and the reproduction of elite power structures, raising questions about the transformative potential of NGO-led initiatives. Across the literature, scholars agree that Moroccan NGOs have driven public debate and democratized the public sphere but warn of the need for ongoing vigilance and deeper grassroots mobilization to ensure that legal and policy changes translate into real, lived improvements for all Moroccan women.

1.2. Studies in Turkish Women's Activism, Advocacy and Legal Reform

The historiography of Turkish women's activism has long been structured by what Şirin Tekeli (1992) famously called the “waves metaphor.” This framework distinguishes a “first wave,” beginning in the late-nineteenth-century Ottoman era and concluding in 1935 with the forced dissolution of the Turkish Women's Union (Türk Kadınlar Birliği ‘TKB’) under the single-party regime, and a “second wave” emerging only after the 1980 military coup. While Tekeli's work was foundational—especially in identifying “state feminism” and the “myth of equality” (Tekeli, 1992, p. 140) promoted by the Kemalist regime—the waves metaphor has come under increasing criticism in recent years. Scholars such as Adak & Çağatay (2023) argue that this narrative homogenizes diverse forms of women's activism, privileging urban, well-educated, middle-class women. As a result, forms of activism that politicized gender alongside class, nation, ethnicity, and religion have been marginalized or erased. The metaphor also imposes a false sense of rupture or “discontinuity,” overlooking women's ability to adapt and survive under different political circumstances, particularly during the so-called silent years from 1935 to the 1980s.

In the historiography of women's activism in Türkiye, the publication of Serpil Çakır's *Osmanlı Kadın Hareketi (Ottoman Women's Movement)* in 1994, was fundamental. By relying on a close reading of the women's journal *Kadınlar Dünyası* (1913-1921), Serpil Çakır demonstrates that an autonomous Ottoman women's movement existed well before the establishment of the Republic and that Ottoman women actively pursued their own struggles for education, employment, legal

equality, and participation in public life. In doing so, she challenges the historical narrative that women's rights were simply granted from above in the early Republican era. Her work demonstrates that Ottoman women were not passive figures who received modernization reforms as a benevolent gift, and instead positions them as active, demanding, and politically engaged actors. This work played a crucial role in establishing the late Ottoman women's movement as the 'first wave' within feminist historiography. Serpil Çakır's work, together with a substantial body of subsequent scholarship that was produced after (Demirdirek, 1993; Zihnioğlu, 2003; Toprak, 2015; Adak, 2020) demonstrates that many agendas commonly attributed to the "second wave" such as employment rights, equal access to education, participation to political life, legal equality and childcare support along with early critiques of unpaid domestic labor, were discussed by women much earlier. As reviews on Turkish women's history demonstrate (Sirman, 1989; Öztürkmen, 2013; Çağatay & Adak, 2023) Turkish feminism is characterized by plural trajectories, strategies, and sites of contestation across different eras and actors. While the "wave" metaphor has commonly been used to narrate the history of feminist movements, recent intervention by Çağatay and Adak (2023) demonstrate that its explanatory power remains rather limited. Late Ottoman and early Republican women's activism in Turkey were largely articulated by urban, educated, and secular women. However, over time, particularly since the late 1990s, the movement has expanded through the inclusion of various actors and agendas, including Muslim Feminists, Kurdish women and other marginalized groups addressing intersecting forms of inequality.

Another central thread in the scholarship is the relationship between religious politics and gender equality. Yeşim Arat (2010) applies the concept of the "democratic paradox," in which democratization and the expansion of religious freedoms, especially under the Justice and Development Party (AKP) since 2002, have coincided with growing pressures on women's rights and gender equality. Arat details how the state bureaucracy and educational system have propagated patriarchal religious values, with state-appointed cadres promoting traditional gender roles and implicitly discouraging women's full participation in public and economic life. She argues that these developments pose a more significant threat to gender equality than high-profile issues such as the headscarf ban. Arat also underscores the importance of global engagement, particularly through European Union (EU) accession and international

conventions—in legitimizing and sustaining opportunities for women’s rights in Türkiye. Building on this, Deniz Kandiyoti’s work, especially “Bargaining with Patriarchy” (1988) and “Disentangling Religion and Politics: Whither Gender Equality?” (2011), provides a theoretical framework for understanding how gender equality discourse and religious rhetoric are often instrumentalized to serve political agendas. Rather than reinforcing binaries such as “secular” versus “religious,” Kandiyoti (2011) calls for institutional analysis attentive to the “fluid networks of influence” (p. 13) referring to the dynamic networks of actors, institutions, and interests operating across global, national, and local scales that shape struggles for gender equality. She highlights a global trend wherein international donors and development agencies increasingly favor faith-based organizations as partners in gender and development work, especially as states retreat from public service provision. This donor-driven shift, Kandiyoti highlights risks marginalizing or eliminating secular spaces essential for open debate and advocacy around gender equality, potentially empowering actors less committed to universal women’s rights.

Women’s advocacy and the complexities of legal reform in Türkiye have been illuminated by a substantial body of scholarship, which emphasizes both landmark achievements and persistent obstacles to substantive gender equality. Şirin Tekeli (1992) is widely recognized for her foundational work on the development of the Turkish women’s movement, tracing the shift from state-led Kemalist ‘state feminism’ to the emergence of an autonomous feminist movement in the 1980s. Tekeli highlights how feminist activists, primarily young, urban, and professional women, organized independent campaigns, such as the ‘Purple Needle’ protest and mobilizations for the implementation of CEDAW obligations, that challenged not only state neglect but also the limitations of earlier Kemalist reforms. Her analyses trace how feminist critique catalyzed greater attention to women’s issues within mainstream political parties, while also exposing the enduring legacy of state feminism in constructing a “myth of equality.” Yeşim Arat (2010; see also 1994) explores how women’s grassroots mobilization in the 1980s expanded opportunities for advocacy, often in direct opposition to state policies and patriarchal social norms. In her 2010 and 2021 analysis, Arat documents the paradoxical effects of democratization, noting that while legal reforms brought Türkiye closer to international standards, the propagation of patriarchal religious values through state institutions, education, and civil society

undermined women's agency. Her work draws attention to the ongoing tension between state institutions, conservative religious values, and feminist demands, showing how traditional interpretations of gender roles continue to constrain women's freedoms despite legislative advances. The previously mentioned and nuanced historiographical approach which was offered by Sevgi Adak and Selin Çağatay (2023), critiques the dominant "waves metaphor" for obscuring the persistence of activism in the so-called "barren years" (1935–1980). Their research recovers the contributions of Kemalist and socialist women's organizations, showing that demands for legal reform, employment rights, and childcare support were raised well before what later came to be known as the 'second wave.' Adak and Çağatay call for a broader, more inclusive understanding of feminism that recognizes diverse forms of agency, including activism within mixed-gender and state-aligned organizations.

Deniz Kandiyoti (2011; see also 1988 for theoretical context) discusses the significant reforms of the early 2000s, including the 2001 Civil Code and 2004 Penal Code changes. These laws—achieved through sustained efforts of women's movements and professional associations—established formal equality in marriage, eliminated sentence reductions for so-called 'honor crimes,' expanded protections against sexual violence, and recognized forms of marital rape within the Penal Code. Kandiyoti, however, is critical of the instrumentalization of both gender equality discourse and religious rhetoric in the service of political agendas. In her seminal 1988 article, she introduced the influential concept of 'patriarchal bargains,' arguing that Turkish women's strategies for negotiating power and protection are deeply shaped by the constraints of 'classic patriarchy,' and that policy reforms alone cannot dismantle these embedded gender hierarchies. Feride Acar and Gülbanu Altunok (2013) provide further analysis of recent legal reforms, emphasizing the critical role of women's organizations in pushing for the 2004 Penal Code reform, and highlighting new challenges posed by neoliberal and neoconservative policies that reinforce women's caregiver roles while neglecting broader gender equality concerns.

Collectively, the scholarly work of Deniz Kandiyoti and Yeşim Arat , alongside foundational contributions from figures such as Şirin Tekeli, Arzu Öztürkmen (2013) and Sevgi Adak and Selin Çağatay (2023) , provide a nuanced and multi-layered account of women's activism and gender politics in Türkiye and highlights the independent and pluralistic activism that emerged in the 1980s and beyond and

investigate how women's agencies are shaped by, and in turn shapes, the interplay between state, society, and global trends. The scholarship has drawn attention to the rich diversity of women's agency across social, cultural, and ethnic divides, emphasizing the need to incorporate the experiences and strategies of women beyond elite, urban, or secular circles. The combined analyses of these scholars highlight both the achievements and persistent obstacles in advancing gender equality, revealing that women's rights in Türkiye have been shaped by ongoing negotiations within a dynamic nexus of local traditions, state structures, and global influences.

1.3. Gaps in Existing Research and Justification for Comparative Study

Despite a rich and expanding body of scholarship on women's activism, legal reform, and advocacy in both Morocco and Türkiye, several significant gaps persist, especially in relation to comparative and transnational perspectives. Much of the existing literature on Morocco focuses on the development of feminist movements, the evolution of family law, and the role of NGOs, but often addresses international influences only in general terms or through later dynamics such as CEDAW engagement or the 'NGO-ization' of the movement (Evrard, 2014; see also Sadiqi, 2014). Similarly, scholarship on Türkiye has addressed major legal reforms, feminist mobilization, and, through recent historiographical interventions, the interplay between secular and religious currents (Tekeli, 1992; Arat, 2010; Kandiyoti, 2011; Adak & Çağatay, 2023), but often lacks in-depth comparative analysis with North African contexts or systematic accounts of how global feminist agendas, especially those rooted in the United Nations Decade for Women (1975–1985), were engaged by national actors. A recurring gap in both literatures is the limited attention to how international feminist frameworks and initiatives, particularly those introduced during the UN Decade for Women, were received, adapted, or contested by women's movements in Morocco and Türkiye during the late 20th century. While there are valuable studies on the influence of global norms (e.g., CEDAW) and the rise of transnational feminist networks from the 1990s onward, detailed, comparative accounts of the earlier period remain rare. Moreover, most research either focuses on a single country or offers regional overviews that do not provide granular comparative insight.

This thesis does not attempt to fill every gap identified in the literature, especially those requiring extensive primary archival research or in-depth

organizational histories. Instead, it aims to synthesize and critically compare how academic scholarship represents the influence of global and transnational feminist engagements on women's advocacy and legal reform in Morocco and Türkiye during the period 1975–2010. This focused approach hopes to clarify patterns, surface new comparative questions, and provide a groundwork for future research, while also acknowledging the ongoing need for studies that engage directly with primary sources, organizational archives, and oral histories to deepen understanding of transnational feminist dynamics in both contexts.

1.4. Theoretical Framework

Women's rights movements in the Global South have long navigated the complex interplay between local legal norms, religious frameworks, and international human rights agendas. In the context of Morocco and Türkiye, two countries with distinctive socio-political trajectories yet comparable experiences with different angles of legal pluralism and global feminist engagement; understanding this interplay necessitates a theoretical grounding that captures both the tensions and transformative potential of cross-border advocacy. This framework adopts New Legal Pluralism and Transnational Feminism as the primary theoretical lenses to analyze how women's movements in these countries have strategically engaged global frameworks while contending with local sociocultural and legal realities. Legal Pluralism refers to an analytical framework that critically examines how various legal systems, including formal state law, religious law, customary or traditional law, and international legal instruments, coexist and interact within a given society, often producing overlapping and sometimes conflicting norms (Merry, 1988). Rather than viewing law as a unified or neutral structure, legal pluralists emphasize that law is a socially embedded and power-laden institution that reflects and reinforces dominant hierarchies (Merry, 1988). This perspective becomes especially significant in postcolonial, Muslim-majority societies such as Morocco, where legal systems are shaped by a fusion of colonial legacies, Islamic jurisprudence, indigenous customs, and modern nation-state codifications. However, as Merry (1988) points out, that every society is legally plural, regardless of whether it has experienced colonization or not, when the term "legal system" is redefined broadly. Thus, the new legal pluralism is central to reconceptualizing how law operates within society (Merry, 1988). In these contexts, legal reform efforts around gender justice are often sites of intense political

negotiation, as they intersect with questions of national identity, religious authenticity, and international obligations.

As Bano (2017) demonstrates in the context of Muslim communities in secular Western democracies, when legal reforms fail to reflect lived realities, people often rely on informal or religious mechanisms for resolving family and gender-related disputes. This dynamic, where individuals navigate between formal state law and community-based norms, is not limited to minority settings. A similar pattern has appeared historically in Muslim-majority contexts. This applies to the Turkish context, as Merry (1988) notes, although modernization theorists in the 1960s and early 1970s viewed law as a potent tool for transforming societies, subsequent research revealed the limited social impact that legal reforms may create. Drawing on the example of Türkiye, she explains that:

“In contrast to Massell's analysis (1968) of the revolutionary impact of new laws on the status of women in the Islamic societies of Soviet Central Asia, for example, Starr and Pool (1974, p.534) showed that the drastic law re-forms introduced into Turkish society in 1926 that swept away Islamic Ottoman law in favor of the Swiss civil code produced relatively little change in the normative ordering of local villages.” (p. 880).

This implies that much of the Turkish population continued to follow customs at that era. This continues to happen today in rural areas and within religious and conservative groups, where disputes and matters related to women are resolved not by the formal law but by following traditional order. This observation illustrates that even revolutionary legal change does not automatically reshape underlying social norms, a key insight underpinning the present thesis's use of the new legal pluralism coined and redefined by Sally Engle Merry (1988) to explain the partial implementation of gender-related reforms in Türkiye. In Morocco it is much more obvious and easier to observe such interactions, for instance, efforts to reform family law, often governed by religious or customary norms tend to provoke significant resistance, particularly when framed as being influenced by “foreign” or Western ideas (Sadiqi, 2008). The value of the new Legal pluralism lens lies in its ability to reveal how women's rights are not only defined by the content of legal codes but also by the interactions and tensions between different legal regimes and the actors who interpret and enforce them. It draws

attention to the lived experiences of women navigating these systems, often strategically shifting between legal forums depending on which offers greater protection or legitimacy. So, the work of Merry (1988) and Bano (2017) complement each other in demonstrating and understanding how legal pluralism uncovers that gendered power relations operate across formal and informal institutions, and how women both resist and comply with the constraints these institutions impose and where top-down legal reforms have coexisted uneasily with deeply rooted social and religious norms.

In Morocco, the state family law, *Mudawana*, reflects a structure influenced by Islamic jurisprudence (Maliki school), and more recently, international human rights norms. Feminist activists, particularly from organizations such as Association Démocratique des Femmes du Maroc (ADFM) and Union de l'Action Feministe (UAF), have employed the language of international legal instruments like CEDAW to advocate for reforms that both respect cultural specificity and advance gender equality (Sadiqi, 2008). Legal Pluralism allows scholars to interrogate how these activists navigate overlapping and sometimes conflicting legal norms. Rather than framing international norms as external impositions, Moroccan activists have often localized global discourses in part through an Islamic feminist lens, using reinterpretations of *Shari'a* as a strategy to avoid accusations of Westernization while simultaneously advocating progressive reforms (Sadiqi, 2008). Similarly, Türkiye's legal history is marked by strong secular state reforms under Atatürk, which formally established gender equality under civil law. However, legal formalism coexists with deeply embedded patriarchal norms and the institutional propagation of conservative religious values, particularly in rural and conservative regions (Kandiyoti, 2011). Women's organizations have worked within this duality, leveraging both Türkiye's secular civil law and international agreements, and in the 1990s, pious Muslim women activists complemented feminist politics with Islamic values (Diner & Toktaş, 2010). They actively worked to reinterpret religious texts and challenge patriarchal readings of the Qur'an that had historically confined women to the private sphere (Diner & Toktaş, 2010), contributing to broader struggles over gender equality and reform (Acar & Altunok, 2013). In this context, legal pluralism offers a useful lens for understanding how women's activism unfolds within overlapping and sometimes conflicting legal frameworks. It highlights how the state's selective enforcement of different legal

norms, for example, criminal codes versus personal status laws, can simultaneously open opportunities for women's rights initiatives while also reinforcing patriarchal constraints. Scholars such as Kandiyoti (1988) refer to this dynamic as the 'patriarchal bargain,' whereby women develop strategies for securing protection and negotiating power within deeply embedded patriarchal social structures. This perspective aligns with broader critiques in transnational and postcolonial feminist scholarship, which call for moving beyond universalist liberal feminist frameworks and emphasize the importance of local voices and culturally grounded strategies.

This approach is crucial for feminist activists operating in diverse cultural contexts, as they must navigate the complexities of gender norm translation and avoid the simplistic binary of "tradition versus modernity." Drawing on Zwingel's (2012) analysis, transnational feminist scholarship resists the view that international women's rights norms are simply improvements imposed on backward local practices, or that traditions are merely obstacles. Instead, Zwingel argues that both domestic and global norm creation are highly contextualized processes immersed in culture, which undermines dichotomous views of culture-free rights advocates versus tradition-bound societies. Activists, therefore, engage in "norm translation" and "vernacularization", processes that do not simply diffuse global norms in a one-way direction, but rather involve translating international gender norms into culturally understandable and acceptable forms. This allows for the emergence of diverse legal discourses that are both locally rooted and internationally legitimate. As Zwingel (2012) emphasizes, "cross-cultural encounters and transmissions of meaning" (p.124) enable activists to strategically negotiate between local acceptance and international standards, even as they confront the inherent dilemma of rooting new norms in societies where they are meant to challenge prevailing belief systems. Ultimately, the goal is as Zwingel (2012) states is for gender equality norms to be "cross-culturally negotiated rather than imposed," (p. 126) resulting in mixed, context-sensitive outcomes. Zwingel's core argument here is for adopting a transnational perspective that views global norms, like the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), not as an "indisputable international measuring stick," but as instruments whose impact depends on contextualized agency and cultural interpretation.

Therefore, transnational feminism offers a complementary perspective by emphasizing the importance of cross-border networks, institutional alliances, and

ideological solidarities in shaping feminist advocacy; while scholarship on the transnational circulation of norms further illustrates how global ideas are translated and adapted in local contexts (Merry, 2006). Unlike earlier internationalist feminist models, which often centered Euro-American priorities, transnational feminism stresses the relational, negotiated, and contested nature of feminist engagements across national and cultural boundaries (Mohanty, 2003; Grewal & Kaplan, 1994).

The UN Decade for Women (1975–1985) catalyzed the formation of transnational feminist networks by offering institutional spaces such as the Nairobi and Beijing conferences where feminists from the Global South could articulate their own agendas. Both Moroccan and Turkish feminist movements participated actively in these forums. In Morocco, ADFM and allied organizations used transnational platforms to build alliances with international feminist and human rights networks, which later strengthened their domestic campaigns for family law reform (Salime, 2011). These transnational ties also enabled Moroccan activists to gain access to international funding and technical expertise, which proved vital during the campaign for the 2004 Mudawana reform. In Türkiye, women's organizations engaged with the UN Beijing Platform for Action and other international instruments to push for domestic legislative change. Transnational feminist frameworks and international human rights norms helped provide the legitimacy and discursive tools that enabled Turkish activists to frame issues such as gender-based violence, honor crimes, and legal discrimination as universal human rights concerns rather than solely cultural or domestic matters (Arat, 2010). This framing played a crucial role in legitimizing feminist advocacy within national debates and offered activists a broader legal and ethical foundation to press for reforms. By situating their demands within globally recognized human rights discourses, Turkish women's organizations were able to strategically challenge patriarchal norms and press national institutions toward accountability and reform. These dynamics unfolded within a broader political context in which international norms and EU-driven equality agendas interacted with shifting state policies on gender (Acar & Altunok, 2013). Importantly, transnational feminism is not uncritical of globalization. Scholars of transnational feminism emphasize that cross-border networks must avoid reproducing hierarchies and should center local agency (Mohanty, 2003; Grewal & Kaplan, 1994). In both Morocco and Türkiye, feminist actors have critically engaged with Western feminist paradigms, adapting

global discourses to local realities rather than adopting them wholesale. This selective appropriation of global norms is evident in both countries' engagement with CEDAW; while both states ratified the Convention, reservations and implementation strategies reveal the political negotiation involved in integrating global gender norms into national legal and social contexts. Taken together, Legal Pluralism and transnational feminism offer a multidimensional lens through which to analyze women's activism in Morocco and Türkiye from 1975 to 2004. They respectively help capture the legal and institutional terrain upon which women's rights are negotiated, including the interplay between state, religious, legal customs, tradition and international legal regimes. And situates these legal and political negotiations within broader networks of feminist solidarity, funding, and discourse exchange.

Applying this dual framework to the study's focus allows for a deeper understanding of:

- How legal reforms emerged from the interaction between local feminist strategies and global legal norms. In Morocco, this dynamic is evident in the 2004 Mudawana reform, while in Türkiye the revised civil and penal code reforms of 2001–2004 were advanced and consolidated upon an already strong legal foundation established during the Atatürk era, which had long embedded women's rights into the republican state project. How activists localized international norms without simply mimicking Western feminist models.
- How engagement with transnational feminist networks and UN frameworks (CEDAW, Beijing Platform) shaped and strengthened the advocacy, legitimacy, and success of these movements.

Moreover, this integrated approach aligns with the study's aim to analyze how global and transnational feminist engagements, particularly those catalyzed during and after the UN Decade for Women 1975-1985, influenced local advocacy strategies and legal reforms in the two countries till 2004. It also provides the conceptual clarity necessary to avoid overgeneralizations about "Western" versus "non-Western" feminism, instead centering the analysis on feminist agency, negotiation, and local adaptation.

1.5. Sources, Methodology and Organization of the Thesis

This thesis relies on both primary and secondary data. Namely, the United Nations official reports and peer-reviewed journal articles, academic monographs, and edited scholarly volumes to examine the evolution, strategies, and outcomes of women's activism in Morocco and Türkiye between 1975 and 2004. The research takes a comparative approach, analyzing how global and transnational feminist engagements, particularly those initiated during the United Nations Decade for Women, shaped advocacy, legal reform, and policy change in both countries. The analysis is grounded in an extensive review and synthesis of official reports and scholarship by leading figures in the field. For Morocco, the research mostly draws on the works of Fatima Sadiqi, Zakia Salime, Mounira Charrad, Moha Ennaji, Valentine Moghadam, and Osire Glacier, among others. For Türkiye, it engages mainly with scholarship by Şirin Tekeli, Yeşim Arat, Deniz Kandiyoti, Feride Acar, Gülbanu Altunok, and Sevgi Adak, as well as academic contributions to the literature on women's movements, legal pluralism, and transnational feminism.

The thesis adopts a comparative, **qualitative methodology**. By focusing on scholarly interpretations and debates, the thesis aims to capture both the convergences and divergences in the trajectories of women's activism, the influence of global feminist norms, and the specific challenges encountered in implementing legal and policy reform.

Key methodological steps include:

- **Systematic Literature Review:** Identifying and critically engaging with relevant academic works on women's movements, legal reforms, and international engagement in Morocco and Türkiye.
- **Thematic Analysis:** Organizing findings around core themes—such as advocacy strategies, state feminism, legal pluralism, and the impact of transnational feminist networks.
- **Comparative Approach:** Examining each country's context in parallel, while drawing out points of convergence and divergence in their experiences of transnational feminist influence.

- **Contextualization:** Situating the findings within the broader socio-political and legal histories of each country, with special attention to the interplay between local traditions, global norms, and state policy.

Where scholarly interpretations diverge or where the literature reveals gaps, the thesis acknowledges these and situates its analysis accordingly.

Organization of the Thesis

The thesis is structured as follows:

- **1 INTRODUCTION:** Outlines the research aim, questions, scope, justification for the periodization, and theoretical frameworks.
- **2 The United Nations and the Emergence of Global Gender Norms:** Provides background knowledge about the United Nations' origin, the initiation of the decade for women, the international gender equality framework such as The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the decade conferences (1975-1985) and Beijing plan of action (1995).
- **3 Morocco:** Examines the development of women's activism, policy advocacy, and legal reform in Morocco, with particular attention to the interplay of local dynamics, global feminist engagement, and legal pluralism.
- **4 Türkiye:** Analyzes the evolution of women's movements and legal reforms in Türkiye, tracing their strategies for engaging with international feminist frameworks and domestic legal structures.
- **5 Comparative Discussion:** Brings the Moroccan and Turkish cases into direct dialogue, analyzing the similarities and differences in how transnational feminist initiatives shaped policy advocacy and legal outcomes. Summarizes the main findings, discusses their implications for the field, and suggests potential directions for future research. Each chapter is organized thematically and chronologically to allow for both in-depth country-specific analysis and meaningful comparative reflection. The structure is designed to facilitate a critical, nuanced understanding of how women's movements in two different Muslim-majority countries navigated

the opportunities and constraints posed by global feminist engagement between 1975 and 2004.

- **CONCLUSION**



2. THE UNITED NATIONS AND THE EMERGENCE OF GLOBAL GENDER NORMS

2.1. The Origins of United Nations

There is a substantial scholarly literature examining how the United Nations emerged and developed during and after the Second World War (Kennedy, 2007; Schlesinger, 2009; Mazower, 2013; Thakur, 2016). Nonetheless, the following overview draws primarily on the U.S. Department of State's historical account, *The United States and the Founding of the United Nations, August 1941–October 1945* (U.S. Department of State, Office of the Historian, Bureau of Public Affairs, 2005). This official report details the U.S. role in conceptualizing and shaping the post-war international organization, tracing developments from the Atlantic Charter through the Dumbarton Oaks proposals. The impetus to establish the United Nations grew in large part from the inability of its predecessor, the League of Nations, to prevent the outbreak of the Second World War (U.S. Department of State, n.d.). The League failed to stop serious international transgressions in the 1930s, such as Japan's invasion of Manchuria, and was hindered by its requirement that many decisions, including those involving a response to aggression, be decided unanimously. President Franklin D. Roosevelt recognized the inherent weaknesses of the League of Nations and determined that U.S. leadership was essential for the creation of another international organization aimed at preserving peace (U.S. Department of State, Office of the Historian, 2005). Roosevelt felt that, in contrast to the League, the new organization needed the power to enforce key decisions. Planning for the new organization began with the Atlantic Conference in August 1941, the first wartime meeting between British Prime Minister Winston Churchill and President Roosevelt, which took place off the coast of Newfoundland before the United States formally entered the war as a combatant. At this meeting, the United States joined Britain in issuing the joint declaration known as the Atlantic Charter (U.S. Department of State, Office of the Historian, 2005). This pronouncement outlined a vision for a postwar order supported by an effective international organization intended to replace the struggling League of Nations. During the conference, Roosevelt privately suggested the name of the future organization: the United Nations (U.S. Department of State, Office of the Historian, 2005). Shortly after

the United States entered the war, the governments of the United States, the Soviet Union, the United Kingdom, and China formalized the Atlantic Charter proposals in the Declaration of the United Nations in January 1942 (U.S. Department of State, Office of the Historian, 2005). In the Declaration, these four major Allied nations, along with 22 other states, agreed to work together against the Axis powers (Germany, Japan, and Italy). They also committed in principle to the establishment of the United Nations after the war (U.S. Department of State, Office of the Historian, 2005).

The major Allied Powers, the United States, the Soviet Union, the United Kingdom, and China, reiterated their commitment to forming an international organization in the Moscow Declaration of October 30, 1943 (U.S. Department of State, Office of the Historian, 2005). This commitment prompted more concrete international planning for the structure of the new organization. Following this, representatives from these four countries met at Dumbarton Oaks in Washington, DC, from August 21 through October 7, 1944. At the conclusion of this meeting, the four Allied powers issued a statement of Proposals for the Establishment of a General International Organization. These proposals were largely based on a draft charter formulated by the State Department's Subcommittee on International Organization, in consultation with the U.S. (U.S. Department of State, Office of the Historian, 2005). Congress. The Department of State subsequently printed over 200,000 copies of the Dumbarton Oaks proposal and an informative, eight-page guide to the draft United Nations Charter to build public support (U.S. Department of State, Office of the Historian, 2005). The basic framework for the proposed United Nations rested on President Roosevelt's vision that the United States, the Soviet Union, the United Kingdom, and China would provide leadership in the postwar international system. This structure dictated that these four states, with the addition of France, would assume permanent seats in the otherwise rotating membership of the United Nations Security Council (U.S. Department of State, Office of the Historian, 2005).

2.2. The Yalta Conference and San Francisco Conferences (1945)

This section traces the decisive wartime conferences and diplomatic negotiations, from Yalta to San Francisco, that shaped the structure and founding Charter of the United Nations. One of the high-level and pivotal meetings that laid the groundwork for the post–World War II international order was the Yalta Conference, held in February 1945. This meeting underscored the need for cooperation among the

major powers to maintain international peace and security (U.S. Department of State, 2005). Attended by the “Big Three” Allied leaders—Winston Churchill (United Kingdom), Franklin D. Roosevelt (United States), and Joseph Stalin (Soviet Union)—it established the framework for the United Nations, clarified the powers and voting procedures of the Security Council, and set the stage for Allied cooperation in maintaining peace (U.S. Department of State, Office of the Historian, 2005). It resulted in an agreement to establish the United Nations with a Security Council composed of five permanent members—the United States, the United Kingdom, the Soviet Union, France, and China—with veto power (U.S. Department of State, Office of the Historian, 2005). The adoption of this “Yalta formula” meant that decisions on substantive matters required the affirmative votes of seven members, including the concurring votes of all permanent members (with the exception that parties to a dispute may abstain), whereas procedural matters required only a majority vote (U.S. Department of State, Office of the Historian, 2005).

While the initial blueprint came from Dumbarton Oaks, the official establishment and detailed mapping of the structure took place at San Francisco where the Charter was signed (U.S. Department of State, Office of the Historian, 2005). The historic event that finalized the creation of the United Nations, an international organization designed to promote peace, security, and cooperation among nations (April–June 1945). Officially known as the United Nations Conference on International Organization, the purpose of such gathering was to draft and finalize the Charter of the United Nations, and implement the agreements made at earlier meetings, especially the Dumbarton Oaks Conference (1944) and the Yalta Conference (February 1945), to establish a new international organization to maintain peace and security after World War II (U.S. Department of State, Office of the Historian, 2005). The event translated earlier agreements into a concrete Charter, established the UN’s structure and procedures, and set the foundation for postwar international relations (U.S. Department of State, Office of the Historian, 2005). The conference marked a collective commitment by fifty nations to work together to prevent future wars and address global challenges. Key Outcomes of this conference were respectively, the adoption and unanimous approval of the United Nations Charter on June 25, 1945. The Charter established the General Assembly, where all member states have equal representation. The Security Council, with five permanent members (United States,

United Kingdom, Soviet Union, China, and France) having veto power. Added other principal organs such as the Economic and Social Council, International Court of Justice, Trusteeship Council, and Secretariat. The Voting procedures for the Security Council were finalized, including the "Yalta formula" requiring affirmative votes of seven members including all permanent members for substantive decisions (U.S. Department of State, Office of the Historian, 2005). China was honored as the first country to sign the Charter, recognizing its long-standing fight against aggression. The conference invited additional countries to join, including Argentina, Belarusian SSR, Ukraine, and Denmark. Interim arrangements were made for the Preparatory Commission to organize the first sessions of the UN organs (U.S. Department of State, Office of the Historian, 2005). The Charter came into effect on October 24, 1945, marking the official establishment of the United Nations.

2.3. The Preparatory Commission and First Session

According to the Yearbook of the United Nations, 1946–1947, the Preparatory Commission of the United Nations was created following the signing of the UN Charter in June 1945 to lay the administrative and procedural foundations for the Organization's first sessions. Its mandate was to make provisional arrangements for the functioning of the principal organs, the General Assembly, Security Council, Economic and Social Council, Trusteeship Council, and International Court of Justice, and to ensure the orderly transition from the Charter's adoption to the UN's operational start. The Preparatory Commission met in late 1945, most notably at its session from 24 November to 23 December 1945, where several specialized committees on the General Assembly, Security Council, Economic and Social Council, Trusteeship Council, Secretariat arrangements, financial questions, relations with specialized agencies, and the transition from the League of Nations (United Nations, 1947). These committees produced recommendations that shaped the procedures, structure, and operational framework of the United Nations at its inaugural sessions in 1946 (United Nations, 1947). The Commission drafted provisional rules of procedure for the main organs and recommended the establishment of various commissions such as the Commission on Human Rights. It was also recommended that the UN take over certain non-political functions of the League of Nations (United Nations, 1947). The work of the Preparatory Commission was essential in setting the agenda, rules, and organizational framework for the first General Assembly and other UN bodies. Its

recommendations were submitted to the General Assembly and helped ensure that the UN could begin functioning effectively once the Charter came into force on October 24, 1945 (United Nations, 1947). Finally, the Commencement of institutional functioning the UN was marked by the first sessions of General assembly held in 1946. The first part took place from January 10 to February 14, 1946, in London and the second part from October 23 to December 15, 1946, in New York. During the sessions, the new international body was formally organized and its working procedures established. The key officials were elected, including the President of the General Assembly and members of various committees (United Nations, 1947). The General Assembly adopted its provisional rules of procedure and considered recommendations prepared by the Preparatory Commission concerning the functioning of the principal organs (United Nations, 1947). The agenda for the Assembly's work was discussed and decided. In addition to that organizational, procedural, and substantive matters related to the UN's mission were addressed (United Nations, 1947). Therefore, the stage was set for the organization to begin work on important global issues, including postwar reconstruction, peace and security, and humanitarian concerns.

2.4. The Structure and Organs of the United Nations

Building on the agreements reached at Dumbarton Oaks and finalized at San Francisco, the structure of the United Nations was designed to ensure both representation and enforceability in maintaining peace and cooperation. As recorded in The United Nations Yearbook 1946–1947, the Organization's framework consists of six principal organs, each assigned specific functions and responsibilities.

1. The General Assembly
2. The Security Council
3. The International Court of Justice (ICJ)
4. The Secretariat
5. The Trusteeship Council (inactive since 1 November 1994)
6. The Economic and Social Council (ECOSOC)

Each of these organs has specific functions and responsibilities:

The General Assembly (GA) is the United Nations' central deliberative and representative body, comprising all Member States, each with one vote. It has the power to consider and make recommendations on international peace and security, as

well as elect non-permanent members of the Security Council and appoint the Secretary-General upon Security Council nomination (United Nations, 1947). While its resolutions are non-binding, the Assembly can initiate studies, make recommendations, and coordinate international action. It also oversees major administrative functions such as approving the UN budget, electing non-permanent members of the Security Council and other organs, and appointing the Secretary-General upon the Council's recommendation. However, key decisions such as those on peace, budgetary matters, and membership require a two-thirds majority; all others are decided by simple majority (United Nations, 1947). Though lacking enforcement power, the General Assembly remains a vital platform for multilateral diplomacy and global consensus-building.

The Security Council shall consist of eleven members, with five permanent seats for the United States of America, the United Kingdom of Great Britain and Northern Ireland, the Union of Soviet Socialist Republics, the Republic of China, and France (United Nations, 1947). This organ has a primary responsibility for maintaining international peace and security, and all members of the Organization should accept and conduct its decisions. It is meant to be empowered to investigate and recommend procedures to settle disputes and take action to maintain or restore international peace and security, including working with the Military Staff Committee to advise and assist on military requirements and the regulation of armaments, and it is composed of Chiefs of Staff of permanent members or their representatives (United Nations, 1947). The Security Council's decisions on procedural matters require an affirmative vote of seven members, while decisions on other matters require seven affirmative votes, including those of permanent members. Permanent members must concur except when a permanent member is a party to the dispute, in which case it must abstain (cannot veto) (United Nations, 1947).

The International Court of Justice (ICJ) serves as the principal judicial organ of the United Nations and plays a critical role in upholding the rule of international law. Established under the UN Charter and operating on the framework of the former Permanent Court of International Justice, the ICJ is tasked with resolving legal disputes between states and issuing advisory opinions on legal questions referred to by the General Assembly, Security Council, or other UN organs and specialized agencies authorized to do so (United Nations, 1947). Its mandate is to interpret and apply

international law impartially, ensuring legal consistency across the international system. The Court is composed of fifteen independent judges; each elected to nine-year terms by both the General Assembly and the Security Council. Judges are selected without regard to nationality, though no two may represent the same state concurrently (United Nations, 1947). Re-election is permitted, and this careful composition helps safeguard the Court's integrity and independence (United Nations, 1947).

The Secretariat assigned the role of the UN's administrative organ, headed by the Secretary-General, who is elected by the General Assembly upon the recommendation of the Security Council (United Nations, 1947). The Secretary-General serves as the chief administrative officer of the Organization, oversees the day-to-day work of the UN, participates as required in attending meetings of the General Assembly, Security Council, and ECOSOC (United Nations, 1947). Each year, the Secretary-General presents a report on the work of the UN to the General Assembly and may also bring to the Security Council's attention any issue that could threaten international peace and security (United Nations, 1947).

The Trusteeship Council tasked with overseeing the administration of Trust Territories and guiding them toward self-government or independence. Its core responsibilities included reviewing reports submitted by administering authorities, examining petitions from the territories, organizing periodic visits, and issuing recommendations aimed at advancing the political, economic, social, and educational development of the local populations. In addition to its supervisory role, the Council also assisted the General Assembly in matters concerning non-self-governing territories (United Nations, 1947). Having successfully completed its mission, the Trusteeship Council suspended its operations on 1 November 1994, following the independence of the last remaining Trust Territory, Palau (United nation, Trusteeship Council, n.d).

The Economic and Social Council (ECOSOC) works on international economic, social, cultural, educational, and health-related matters. Initially composed of eighteen-member states, elected by the General Assembly for staggered three-year terms, each country holds one vote, with six new members elected annually to maintain continuity (United Nations, 1947). ECOSOC plays a pivotal role in advancing international cooperation by initiating studies, preparing reports, and making policy recommendations to the General Assembly, member states, and specialized agencies.

Among its broad responsibilities are promoting respect for human rights and fundamental freedoms, recommending, initiating studies, and facilitating drafting international conventions, and convening global conferences (United Nations, 1947). The Council also serves a coordinating function, overseeing the work of various UN agencies and commissions, and can assist the Security Council upon request. Its decisions are adopted by a simple majority vote of members present and voting, reflecting their deliberative and consultative nature rather than binding enforcement power (United Nations, 1947).

In addition to these six principal organs, the United Nations works in close cooperation with a network of specialized agencies, as outlined in Article 57 of the UN Charter (United Nations, 1947). These agencies are intergovernmental organizations entrusted with broad international responsibilities in areas such as economic development, social welfare, culture, education, and health. The Charter empowers the UN to establish formal relationships with such bodies and to coordinate their work through institutional mechanisms (United Nations, 1947). The Economic and Social Council (ECOSOC) plays a leading role in this process as it is authorized to enter into agreements with specialized agencies, coordinate their policies through consultation and recommendations, and receive regular reports on their activities (United Nations, 1947). Notable examples of these agencies include the International Labor Organization (ILO), the Food and Agriculture Organization (FAO), and the United Nations Educational, Scientific and Cultural Organization (UNESCO), all of which operate autonomously while maintaining formal links to the UN system (United Nations, 1947).

2.5. United Nations and Women (Pre-1975)

By the time the United Nations was founded in 1945, women's activism had already established a strong global presence, shaped by decades of suffrage campaigns, peace movements, and engagement with the League of Nations (Skard, 2008). Their contributions during the Second World War only sharpened the urgency of their demands for equality. So, when the San Francisco Conference convened that year, women delegates arrived prepared, and they did not hold back. Despite being vastly outnumbered in a male-dominated forum, they pressed for, and secured, explicit recognition of equal rights for men and women in the UN Charter. This outcome was far from inevitable. Women's NGOs, drawing on interwar experience, lobbied

persistently for strong language on gender equality. A small but determined cohort of female delegates, especially from Latin America, figures like Bertha Lutz of Brazil and Minerva Bernardino of the Dominican Republic, fought hard to embed gender-inclusive provisions (Skard, 2008). Resistance came not only from male delegates but also from some women who feared being dismissed as overly militant. Through a mix of strategic alliances and sheer perseverance, they prevailed. The Charter's preamble reaffirmed "the equal rights of men and women," and non-discrimination based on sex became a foundational principle. This hard-won breakthrough laid the groundwork for the UN's broader institutional engagement with women's rights, most notably the creation of the Commission on the Status of Women in 1946 (Skard, 2008).

According to United Nations Commission on the Status of Women (1974), the Economic and Social Council (ECOSOC), was created by the Charter in 1945 to coordinate international economic and social cooperation. From its first session in 1946, ECOSOC played a central role in promoting women's rights: it established the Commission on the Status of Women (CSW), commissioned global surveys of women's legal and social status, and built working relationships with agencies like UNESCO, ILO, and WHO (United Nations Commission on the Status of Women, 1974). Through these actions, ECOSOC positioned itself as the UN's key forum for linking women's rights to broader social and economic progress. Originally conceived as a Sub-Commission under the Commission on Human Rights, the CSW gained full status in June 1946. It now serves as the major intergovernmental body responsible for advancing gender equality across political, economic, civil, social, and educational realms United Nations Commission on the Status of Women (1974). Among its core functions is legislative and policy review: the CSW studies laws, customs, and practices that affect women's status, pinpoints legal and social obstacles, and proposes reforms to remove discrimination. It champions equal access to education and employment, often in collaboration with UN agencies such as UNESCO and the ILO. The Commission also gathers and disseminates data, issuing questionnaires to Member States and producing reports on women's legal status worldwide; and works with other UN bodies, including the Commission on Human Rights, to integrate gender perspectives into broader human rights debates United Nations Commission on the Status of Women (1974). At the same time, it partners with regional and non-governmental organizations to share expertise and promote women's engagement

in building more just societies United Nations Commission on the Status of Women (1974).

When the CSW held its first meeting in 1947 at Lake Success, New York, its membership of fifteen female government representatives signaled its immediate focus. From early on, the CSW maintained close ties with NGOs, inviting those holding consultative status with ECOSOC to observe its proceedings. Between 1947 and 1962, the Commission concentrated on drafting international norms to challenge discriminatory laws and raise awareness about women's rights (United Nations, 2006). To inform policy and legal drafting, the CSW conducted a global survey of women's political and legal status, yielding data that underpinned later human rights instruments (United Women, n.d.). The CSW also spearheaded early international agreements, the 1953 Convention on the Political Rights of Women, and the 1957 and 1962 conventions concerning women's nationality and marital rights (United Nations, 2006). It contributed to the ILO's 1951 Convention on Equal Remuneration, bolstering the principle of equal pay for work of equal value (United Nations, 2006). In the mid-1960s, the Commission began synthesizing these efforts into broader frameworks. In response to a 1967 General Assembly request, it drafted the Declaration on the Elimination of Discrimination against Women, a precursor to the 1979 Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) (United Nations, 2006). Thus, the UN's early actions on women's rights were not limited to creating CSW. In 1946 alone, a unanimous General Assembly resolution called on Member States to grant women equal political rights, voting and office-holding. Concurrently, ECOSOC initiated surveys of women's legal status, urged cooperation with UNESCO and the ILO, and highlighted women's roles in peacebuilding. Together, these foundational steps set both normative principles and institutional mechanisms for global efforts toward gender equality.

2.6. International Women's Year and The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

The 1970s is a crucial turning point for women's rights within the United Nations system. Despite the inclusion of women's equality in the UN Charter in 1945, it was only until the 1970s that women's issues started to be taken seriously in the United Nations system and by Member States broadly speaking (Skard, 2008). This recognition came after decades of persistent advocacy, mobilization, and demands

from women's organizations which pressed the UN to move beyond rhetorical commitments and begin implementing concrete measures toward gender equality (Skard, 2008). In 1972, the 25th anniversary of the Commission on the Status of Women; the UN General Assembly adopted Resolution 3010 (XXVII), officially proclaiming 1975 as International Women's Year (United Nations, 1976, International Women's Year Report). This decision was rooted in both symbolic and strategic considerations, marking twenty-five years since the inaugural session of the Commission on the Status of Women. It underscored the need to reinforce the universal recognition of equality between men and women, both in law and in practice, and to intensify efforts to improve the status of women (United Nations, 1976, International Women's Year Report).

It further called on Member States to take active steps to realize the principles of the 1967 Declaration on the Elimination of Discrimination against Women, a declaration, treaty that expressed commitment but had no legal enforcement (United Nations, 1976, International Women's Year Report). It is a precursor to CEDAW and reflected the growing pressure from women's movements and governments in the 1960s, (Skard,2008; United women, n.d). In addition, the resolution encouraged governments to ratify the ILO's 1951 Equal Remuneration Convention, which was one of the earliest international treaties to explicitly tackle gender inequality in the workplace. It gave legal weight to the principle of equal pay for equal work, which had already been mentioned in the Universal Declaration of Human Rights (UDHR) (1948, Article 23) (United Women, n.d). Finally, the resolution tasked the UN Secretary-General with preparing a program of action for the year, in consultation with Member States, specialized agencies, and relevant NGOs, to be reviewed by the Commission on the Status of Women in 1974 (United Nations, CSW 25th Session, 1974).

The institutional machinery for International Women's Year (UN bodies and mechanisms responsible for creating the global framework and coordinating the year's activities) was set into motion during the Twenty-fifth Session of the Commission on the Status of Women, held from January 14 to February 1, 1974, (United Nation, CSW 25th Session, 1974). The process began with a draft programme submitted by the Secretary-General, which was based on the replies from 29 Governments, five specialized agencies, and twenty-three non-governmental organizations, (United

Nation, CSW 25th Session, 1974). To refine this proposal, the Commission established a Working Group comprising representatives from sixteen countries, which convened over seven meetings to revise and strengthen the document. Chaired by Mrs. Phaes of Greece, the group reviewed numerous amendments and submitted a revised version of the program, which the full Commission approved by consensus on January 31, 1974 (United Nation, CSW 25th Session, 1974). The adopted “Programme for the International Women's Year, 1975” outlined the central themes of equality, development, and peace, and provided a flexible framework for national, regional, and international action. Alongside formalizing the plan of action, the Commission proposed the creation of a voluntary fund to compensate for budgetary shortfalls, inviting contributions from Member States, NGOs, and private donors. It also endorsed the organization of a major international conference to serve as a focal point for the Year, with Colombia offering to host (United Nation, CSW 25th Session, 1974). The proposal for the key international event of the year passed with a vote of twenty-one in favor, three against, and six abstentions. In the meantime, various countries, and specialized agencies, including the ILO, UNESCO, and FAO, reported early preparations and initiatives aligned with the Year's objectives. The program served as a global call to action, urging Member States to establish national commissions, develop long-term strategies, and raise public awareness in pursuit of gender equality (United Nations, CSW 25th Session, 1974).

2.7. Mexico City Conference, 1975 and the Declaration of the Decade (1976-1985)

According to the United Nations, International Women's Year Report, 1976, the institutional preparations culminated in the First World Conference on Women, the declaration of 1975 as International Women's Year marked a significant milestone in the global advancement of women's rights. Building on decades of activism and the foundational work of the Commission on the Status of Women, the year was designed to bring unprecedented international attention to three interlinked goals that we mentioned earlier: gender equality, women's integration in development, and their vital contributions to peace. This vision took shape most visibly at the First World Conference on Women, held in Mexico City from June 19 to July 2, 1975. A total of one hundred thirty-three states participated, along with representatives from one hundred thirteen non-governmental organizations in consultative status with the UN Economic and Social Council. Key outcomes of the gathering included the adoption

of the Declaration of Mexico on the Equality of Women and Their Contribution to Development and Peace and a World Plan of Action outlining concrete steps for implementation (United Nations, 1976, International Women's Year Report). The conference also recommended the proclamation of a UN Decade for Women (1976–1985) and called for increased female representation in decision-making, particularly within UN delegations. It emphasized priorities such as education, health, vocational training, and economic independence for women, while also addressing broader global injustices like colonialism, racism, apartheid, and human rights violations that disproportionately affected women (United Nations, International Women's Year, 1976). The event featured high-level addresses from the UN Secretary-General, the President of Mexico, and the Prime Minister of Sweden, alongside a range of parallel activities including the Seminar on Women and Development and the International Women's Year Tribune. Resolutions were adopted on issues ranging from women's health and family life to political participation and the elimination of forced prostitution. As the first UN-sponsored global gathering focused exclusively on women, the Mexico City Conference laid critical groundwork for future international gender equality initiatives and reinforced the importance of integrating women as equal partners in peace and development (United Nations, 1976, International Women's Year Report).

2.8. The Creation of UN Bodies and Institutional Support

To make the decade operational, several bodies were created. To strengthen institutional support to implement the UN policies following the momentum of the First World Conference on Women (1975), the United Nations established and reinforced several key bodies. The Division for the Advancement of Women (DAW), which had originated in 1946 within the UN Secretariat, was reorganized to service 3323the Commission on the Status of Women (CSW) (United Women, n.d) and assist the monitoring of the decade activities. The United Nations International Research and Training Institute for the Advancement of Women (INSTRAW) was formally established in 1976 by Economic and Social Council resolution 1998 (LX), following General Assembly resolution 3520 (XXX) of 1975, which endorsed recommendations from the World Conference of the International Women's Year held in Mexico City. Designed as the UN's autonomous research and training institute on women's advancement, INSTRAW was mandated to promote research, training, and awareness

on women's issues globally (United Nations, n.d.). In parallel, the United Nations Development Fund for Women (UNIFEM) was established in 1976, later reinforced by GA resolution 39/125, to function as the UN's women's fund and provide financial and technical support for innovative projects promoting women's empowerment (UNIFEM, 2002-2003). Together, these bodies became central players in mainstreaming women's rights into the UN system until they were merged, along with the Office of the Special Adviser on Gender Issues (OSAGI), into the new entity UN Women in 2010 (GA resolution 64/289) (United Women, n.d.).

2.9. Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)

The momentum generated by International Women's Year (1975) and the World Plan of Action did not remain symbolic. It laid the foundation for a more binding international legal framework on women's rights. While the Mexico City Conference and the launch of the UN Decade for Women highlighted goals of equality, development, and peace, governments and women's organizations increasingly recognized that progress required enforceable obligations, not only political declarations. This realization converged in the drafting of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) adopted by the United Nations General Assembly in 1979, represents a landmark in the global advancement of women's rights (United Nations & Inter-Parliamentary Union, 2003). Often described as an international bill of rights for women, the Convention consolidates and codifies a comprehensive range of civil, political, economic, social, and cultural rights into a legally binding framework. Its overarching purpose is to define discrimination against women and to establish enforceable obligations for States to eliminate such discrimination in both law and practice (United Nations & Inter-Parliamentary Union, 2003).

According to **Article 1**, discrimination is defined as "any distinction, exclusion or restriction made on the basis of sex which has the effect or purpose of impairing or nullifying the recognition, enjoyment or exercise by women...of human rights and fundamental freedoms" (United Nations & IPU, 2003, p.12). This broad yet precise definition lays the groundwork for the Convention's expansive legal and policy mandates, which are articulated across six parts comprising thirty articles.

Part I (Articles 1–6) lays the general foundations (United Nations & IPU, 2003, p.12). It obliges States to enshrine the principle of equality within their constitutions and legal systems, to penalize discriminatory practices, and to take proactive steps toward women's advancement. Notably, **Article 4** legitimizes the use of temporary specific measures, commonly referred to as affirmative action, to accelerate gender parity, so long as such measures are discontinued once substantive equality is achieved (United Nations & IPU, 2003, p.12). It also calls for challenging social and cultural norms that perpetuate gender stereotypes and for eradicating human trafficking and exploitation.

Part II (Articles 7–9) focuses on women's rights in the political and public spheres (United Nations & IPU, 2003, p.12). States parties are required to ensure women's full participation in political life, including the right to vote, hold public office, and engage in civil society (United Nations & IPU, 2003, p.12). Women must also be equally represented in international diplomacy and have equal rights in matters of nationality, including the right to retain or acquire nationality independently of their spouse and to transmit nationality to their children.

Part III (Articles 10–14) addresses discrimination in education, employment, health care, and access to economic resources (United Nations & IPU, 2003, p.12). This section underscores the importance of equal curricula, non-stereotypical teaching materials, and the reduction of female student dropout rates. It calls for equal employment opportunities, fair wages, maternity protections, and access to safe working conditions. Health-related provisions emphasize reproductive health services, while **Article 13** affirms women's rights to economic independence, including access to financial credit and participation in cultural and recreational life (United Nations & IPU, 2003, p.12). **Article 14** is especially notable as it remains the only international legal provision focused specifically on rural women, recognizing their unique vulnerabilities and demanding targeted protections (United Nations & IPU, 2003, p.12).

Part IV (Articles 15–16) solidifies women's legal equality in civil and family matters (United Nations & IPU, 2003, p.12). These articles guarantee equal legal capacity, freedom of movement, and rights within marriage and family relations. States are required to legislate minimum age for marriage and to ensure that women can freely choose their spouse and enjoy equal responsibilities during and after marriage.

Part V (Articles 17–22) establishes the Committee on the Elimination of Discrimination against Women, composed of twenty-three independent experts responsible for monitoring implementation (United Nations & IPU, 2003, p.12). States parties must submit an initial report one year after accession and periodic reports every four years (United Nations & IPU, 2003, p.12). The Committee may issue general recommendations and offer interpretations that help clarify state obligations, although it does not have enforcement power in the judicial sense (United Nations & IPU, 2003, p.12). Finally, **Part VI (Articles 23–30)** covers administrative and procedural matters (United Nations & IPU, 2003, p.12). It allows for the coexistence of more progressive national or international provisions, outlines ratification and amendment procedures, and includes a clause for reservations, though not those contraries to the Convention's core objectives (United Nations & IPU, 2003, p.12). It also introduces a dispute resolution mechanism, allowing States to bring conflicts to arbitration or the International Court of Justice, unless they have opted out (United Nations & IPU, 2003, p.12).

In its scope and legal precision, **CEDAW** remains one of the most influential instruments in international human rights law. It not only compels States to eliminate formal and informal barriers to women's equality but also recognizes that achieving substantive equality requires transforming institutions, laws, and social norms. While the Convention's effectiveness depends on national implementation and political will, it provides an essential legal and moral foundation for women's rights advocacy worldwide.

2.10. The Copenhagen Conference (1980)

The Midpoint Milestone of the UN Decade for Women is the Second World Conference of the United Nations Decade for Women, held in Copenhagen, Denmark, from July 14 to 30, 1980, marked the second major international gathering dedicated to women's rights under the auspices of the United Nations. As the midpoint of the UN Decade for Women (1975–1985), the Copenhagen Conference provided a critical opportunity to assess progress made since the 1975 Mexico City Conference and to chart a clearer, more actionable path for the remaining years of the Decade (United Nation, 1980). Attended by delegates from 145 countries, as well as representatives of UN bodies, specialized agencies, and many non-governmental organizations (NGOs),

the conference reflected both the global reach and growing urgency of the gender equality agenda (United Nation, 1980).

The primary objectives of the Copenhagen Conference were twofold, to evaluate progress during the first half of the Decade, and to adopt a Programme of Action that would guide efforts in its second half (United Nation, 1980). The conference reaffirmed the core themes of the Decade, equality, development, and peace, but gave particular emphasis to practical steps for advancing women's participation in economic, social, and political life (United Nation, 1980). In addition, it expanded its focus to address specific concerns that had received insufficient attention in earlier discussions. These included the situation of migrant, elderly, and disabled women, access to family planning, and the disproportionate impact of apartheid and racial discrimination on women (United Nation, 1980). Delegates also underscored the importance of generating reliable national and regional indicators to measure women's progress and emphasized the critical role of NGOs in implementing the Programme of Action (United Nation, 1980). Mrs. Lise Ostergaard of Denmark, Minister for Cultural Affairs of Denmark and head of the delegation of Denmark, was elected President of the Conference, overseeing discussions that ranged from technical evaluations of development indicators to broader political debates (United Nation, 1980). Supportive messages from heads of state and government lent symbolic weight to the proceedings, though the event was not without its controversies. Geopolitical tensions, including disagreements over language related to Zionism and colonialism, led to divisions among delegations and resulted in some countries voting against or abstaining from adopting parts of the Programme of Action (United Nation, 1980). Despite these political frictions, the outcomes of the Copenhagen Conference were substantial and the Programme of Action for the Second Half of the UN Decade for Women was formally adopted, outlining concrete strategies to accelerate progress toward equality. The conference issued several resolutions, addressing topics such as women's participation in peace and security efforts, the collection of gender-disaggregated statistics, and improved protections for disabled, migrant, and elderly women (United Nations, 1980). A strong condemnation of apartheid and racial segregation was included, along with calls for enhanced international support for women in South Africa and Namibia. Member States were urged to develop monitoring indicators, mobilize resources, and target rural women in development

policies. Governments were also encouraged to work in closer collaboration with non-governmental actors, recognizing their indispensable role in advocacy, implementation, and accountability (United Nations, 1980). The conference's final documents reflected a sobering acknowledgment that progress since 1975 had been slower than anticipated, with many of the same structural barriers to gender equality still firmly in place (United Nations, 1980). However, the event served to reinvigorate international commitment to women's rights, introducing a more implementation-focused agenda and laying the institutional groundwork for the 1985 Nairobi Conference, which would conclude the Decade. The 1980 Copenhagen Conference represented a critical inflection point in the UN's evolving approach to gender equality. While it exposed the persistent gap between rhetoric and reality, and the geopolitical fault lines that could threaten consensus nonetheless succeeded in pushing the agenda forward.

2.11. The Nairobi Conference (1985)

The World Conference to Review and Appraise the Achievements of the United Nations Decade for Women: Equality, Development and Peace took place in Nairobi, Kenya, from July 15 to 26, 1985. Held at the conclusion of the United Nations Decade for Women (1976–1985), the Nairobi Conference was the third and final international gathering organized by the UN to assess global progress on gender equality (United nations, 1986). The choice of Nairobi as the host city followed an official offer by the Government of Kenya, which was accepted by the General Assembly through Resolution 38/108 in 1983 (United nations, 1986). This decision was widely welcomed by the international community, with many delegations' expressing satisfaction that the event was being hosted in Africa, a continent facing unique development challenges, where women's issues were deeply entangled with broader socio-economic and political struggles. Nairobi was not only a symbolic location but also a logistical and political choice that reflected the evolving geography of global feminism (United nations, 1986). The conference was convened primarily to review the achievements and shortcomings of the Decade for Women and to formulate future strategies for gender equality, development, and peace (United nations, 1986). Since the UN's founding in 1945, women's rights had been nominally part of its mandate, as enshrined in the Charter's commitment to the "equal rights of men and women." However, meaningful institutional attention to women's status emerged only

in the 1970s, beginning with the General Assembly's 1972 proclamation of 1975 as International Women's Year (United Nations, 1986). That initiative led to the 1975 Mexico City Conference, where the themes of equality, development, and peace were formally introduced, and the World Plan of Action was adopted. This momentum continued with the 1980 Copenhagen Conference, which provided a midterm assessment and yielded a Programme of Action for the second half of the Decade (United Nations, 1986). On the recommendation of that conference, the General Assembly passed Resolution 35/136, mandating a final review in 1985, timed to coincide with the 40th anniversary of the United Nations itself (United Nations, 1986).

The Nairobi Conference drew participation from large numbers of the UN Member States, a wide array of United Nations bodies, including ECOSOC, the Commission on the Status of Women (CSW), UNIFEM, and INSTRAW, as well as many non-governmental organizations (NGOs) in consultative status with ECOSOC, observers, and civil society representatives (United Nations, 1986). Central to the Nairobi agenda were the familiar themes of equality, development, and peace, but these were examined through the lens of a changing and often unstable global context. As the world was suffering from a deepening economic crisis, particularly in the Global South, where drought, debt, and structural adjustment programs were undermining national development efforts (United Nations, 1986). Women, especially rural women, were disproportionately affected by these hardships, making economic justice a pressing topic. Delegates addressed global political tensions, including apartheid in South Africa, colonialism, foreign occupation, and disarmament, highlighting the interconnection between women's advancement and broader struggles for liberation and peace (United Nations, 1986). Additionally, there was growing recognition of intersectional issues such as the status of migrant, elderly, and disabled women, access to family planning, and the need for gender-disaggregated data to measure progress effectively (United Nations, 1986). These discussions marked the maturation of the global women's rights agenda, shifting from rhetorical advocacy to more nuanced and practical policy debates (United Nations, 1986).

The most significant outcome of the conference was the adoption of the "Nairobi Forward-looking Strategies for the Advancement of Women"; a comprehensive blueprint that assessed the progress of the previous ten years and proposed strategic goals to guide future actions well beyond 1985 (United Nations,

1986). Unlike the earlier conferences, which focused primarily on raising awareness and setting frameworks; Nairobi emphasized implementation, urging governments to integrate gender perspectives into all national policies and to allocate resources toward women's empowerment (United Nations, 1986). The document called for increased support for women's education, employment, political participation, and health services, while also stressing the need for legal reforms and institutional accountability (United Nations, 1986). Importantly, the Strategies recognized that equality, development, and peace were inseparable and mutually reinforcing, and therefore required coordinated international and national efforts (United Nations, 1986).

Despite its ambitious scope, the conference faced several challenges. Political disagreements, particularly around Zionism, imperialism, and colonialism, led to divisions among Member States, with some delegations choosing to abstain or vote against certain provisions of the Forward-looking Strategies (United Nations, 1986). Moreover, the official report of the Nairobi conference (1986) shows that while the participation of NGOs added richness to the debates, there remained a clear gap between official diplomacy and grassroots activism, with civil society voices still struggling for formal recognition in decision-making spaces. Nonetheless, the 1985 Nairobi Conference represented a historic convergence of global efforts to assess and advance the status of women. It built upon a decade of growing international awareness and institutional engagement, culminating in a set of strategies that would inform future UN initiatives and national gender policies. The conference underscored both the progress made and the systemic barriers that remained, setting the stage for a post-Decade era in which gender equality would become an increasingly central concern in global governance.

2.12. The Beijing Platform for Action (1995)

The Fourth World Conference on Women was held in Beijing from 4 to 15 September 1995. According to the official report for Beijing Declaration and Platform for Action (1996), the outcome of this gathering was the adoption of the Beijing Declaration and the Platform for Action (United Nations, 1996), a comprehensive global document on women's rights produced under the United Nations framework. It recognized that although some progress had been made since the Nairobi Conference of 1985, achievements remained uneven and major structural barriers persisted, including the increasing feminization of poverty, limited access to education and

health services, and widespread violence against women (United Nations, 1996). The Platform for Action, formally described as an agenda for women's empowerment, outlined a series of objectives intended to accelerate the implementation of earlier commitments, particularly the Nairobi Forward-looking Strategies (United Nations, 1996). It emphasized the need to remove all obstacles preventing women's full participation in economic, political, social, and cultural life, and highlighted the principle of shared power and responsibility between women and men across public and private spheres (United Nations, 1996). The document reaffirmed that the human rights of women and girls are an integral, universal, and indivisible part of fundamental human rights. It also introduced a focused set of priority actions to be undertaken within the five years following the conference (1995–2000) (United Nations, 1996). The Beijing Report (1996) identifies several global conditions that continued to impede gender equality. It noted that inequalities persisted across all regions and that women remained severely under-represented in political decision-making bodies, holding approximately ten percent of elected legislative seats worldwide. The report drew attention to the disproportionate impact of poverty on women, the gendered consequences of economic restructuring, and the adverse effects of unemployment and inadequate social protection systems. It underscored the necessity of ratifying and implementing international human rights treaties, particularly the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), as a means of ensuring the full and equal enjoyment of human rights by women and girls. The report further recognized violence against women as a major obstacle to achieving equality and peace, describing such violence as a violation of human rights occurring in both public and private settings.

Central to the Platform for Action were twelve Critical Areas of Concern (United Nations, 1996), which outlined specific domains in which gender inequalities were most pressing and where immediate strategic intervention was required. These areas included:

1. The feminization of poverty.
2. Inequalities in access to education.
3. Unequal access to health care.
4. Violence against women.
5. The impact of armed conflict.

6. Economic inequality.
7. Under-representation in decision-making.
8. Weak institutional mechanisms for women's advancement.
9. Insufficient protection of women's human rights.
10. Gender stereotyping in communication and media.
11. Environmental and resource management inequalities.
12. Persistent discrimination against the girl child.

In response to these concerns, the Platform established detailed strategic objectives and actions for governments, the UN system, and civil society organizations (United Nations, 1996). Key actions included revising macroeconomic and social policies from a gender perspective; legislating equal access to economic resources such as land and credit; eliminating discrimination in education; ensuring universal access to primary and secondary schooling; securing women's full right to health throughout the life cycle; promoting sexual and reproductive health rights; increasing the participation of women in decision-making; and adopting gender mainstreaming across all policies and programs (United Nations, 1996). Gender mainstreaming, a central innovation of the Beijing Platform, required policymakers systematically evaluate the gendered impact of legislation, budgeting, administrative processes, and institutional reforms before decisions were made (United Nations, 1996).

Overall, the Beijing Declaration and Platform for Action represented a globally agreed blueprint for addressing entrenched political, economic, social, and cultural barriers to gender equality. It provided a comprehensive, actionable framework for governments and civil society actors seeking to advance women's rights and institutionalize gender-responsive policy. It is important to note that the Beijing Platform for Action later offered a shared international reference point for women's movements in both Morocco and Türkiye. It supplied a standardized vocabulary, clearly defined priority areas, and policy tools that were used by activists, NGOs, and policymakers to frame demands, build coalitions, and advocate for reforms during the late 1990s and early 2000s. These global commitments formed part of the broader international environment within which both countries' reform processes unfolded.

3. MOROCCAN WOMEN'S ACTIVISM, GLOBAL FEMINIST ENGAGEMENT AND OUTCOMES (1975–2004)

3.1. Socio-Political Landscape from Post-Colonial Period to (1975)

The socio-political landscape of Morocco from its independence in 1956 to the eve of the UN Decade for Women in 1975 was marked by the complex interplay of state-building, consolidation of monarchical power, the creation of a conservative legal framework, and the tentative emergence of feminist consciousness (Buskens, 2010). Morocco's transition from colonial rule to independence brought a new configuration of authority, as Sultan Mohamed V, celebrated as the spiritual father of the nationalist movement, worked alongside the powerful Istiqlal Party to establish a stable, unified state. Upon the accession of King Hassan II in 1961, the Moroccan monarchy entered a period of further consolidation, characterized by the establishment of a robust constitutional monarchy and a highly centralized system of governance throughout the 1960s and 1970s (Buskens, 2010). During this era, sometimes referred to as the “years of lead”, the monarchy played a central role in guiding the country through periods of political turbulence, such as the attempted coups of 1971 and 1972 (Buskens, 2010). State authority was reinforced using legal, family, and religious policies designed to preserve both national unity and dynastic continuity. The “Green March” of 1975, which peacefully mobilized thousands in the effort to reclaim the Sahara, exemplified the monarchy's capacity to inspire collective action and foster a sense of national consensus during critical moments (Buskens, 2010). Within this political structure, the legal status of women was primarily shaped by the promulgation of the Mudawana (Code of Personal Status) in 1957–58, a cornerstone of the state's early legislative agenda. While intended to signal Morocco's sovereignty and modernity, the Mudawana drew heavily on a conservative reading of Maliki Islamic law, enshrining the authority-subordination relationship between men and women in marriage, divorce, and inheritance (Buskens, 2010). Women's rights were conceptualized within a patriarchal kinship model that privileged male guardianship and limited women's civil and political rights as citizens.

As Fatima Sadiqi (2014) argues, that the “conservative family law” was central to the postcolonial state's project, which served both as a site for the consolidation of national identity and as a mechanism for entrenching patriarchal values under the guise

of religious authenticity. The resulting framework restricted women's mobility required spousal permission for employment and institutionalized gendered hierarchies that would persist for decades (Sadiqi, 2014). Social and cultural dynamics in the post-independence era further reinforced these patterns. While the legacy of French colonization (1912–1956) had entrenched patriarchy and left much of rural Morocco marginalized, independence only partially weakened these structures. Instead, the new state produced what Sadiqi (2014) terms “neo-patriarchy”, a hybrid of traditional and modern elements, dictated by global capitalism, in which the demands of modernization coexisted uneasily with the imperatives of national and religious identity. State-driven urbanization and industrialization privileged Arabic language, urban centers, and state-sanctioned modernity, further marginalizing rural areas, Berber language and culture, and the women who transmitted them (Sadiqi, 2014). Modernity itself became a source of social hierarchy, creating psychological and material divides between the “urban/modern” and the “rural/traditional”, a divide that would shape both women's lived experiences and their opportunities for activism (Sadiqi, 2017). Amid this context, the nascent Moroccan feminist movement began to emerge. The late 1950s and 1960s witnessed the appearance of a small, largely urban and upper-class secular feminist activists. Their pursuit of women's education and public participation was often linked to social prestige and nation-building goals, rather than a radical challenge to patriarchy. Disappointed by the lack of legal gains despite their contributions to the anti-colonial struggle, some women joined leftist political parties in search of new avenues for advocacy (Sadiqi, 2017). From the 1970s on activism became more organized, later with the Union Socialiste des Forces Populaires (USFP) making family law reform a central demand, including calls for the abolition of polygamy and equality in marriage and divorce. Yet these demands met resistance not only from state authorities but also from male-dominated opposition parties. “State feminism”, exemplified by official support for women's education and employment, remained primarily a tool of national development, rarely translating into genuine empowerment or substantive equality (Sadiqi, 2017).

Throughout this period, women's issues were generally treated as socio-cultural concerns, rarely prioritized in political discourse unless instrumental and they served a broader state or nationalist agendas (Sadiqi, 2017). The state's efforts to promote women's rights were circumscribed by its reliance on a conservative Islamic

framework, and political parties seldom addressed gender except in pursuit of consensus. Citizenship remained largely male-coded, and the public sphere was structured to privilege men's participation (Sadiqi, 2017). Despite these constraints, the 1960s and 1970s saw the rise of feminist literature and oral traditions that began to critique gender norms and challenge dominant historical narratives. Literary works and oral histories brought to light the contributions of marginalized groups, including rural women and Berbers, while offering new visions of social justice and equality (Sadiqi, 2014). These early intellectual and grassroots efforts set the stage for the broader mobilization that would emerge during the UN Decade for Women (1975–1985) and beyond. The period between 1956 and 1975 in Morocco was marked by the entrenchment of patriarchal legal and social norms, the consolidation of monarchical authority, and the cautious emergence of women's activism, conditions that both constrained and informed later engagements with global feminist frameworks. The foundations of Moroccan feminist mobilization, as well as the persistent challenges of neo-patriarchy, regional inequality, and state co-optation, were firmly laid in these years, providing essential context for understanding the strategies, limits, and opportunities of Moroccan women's movements in subsequent decades (Sadiqi, 2017).

3.2. Early Moroccan Feminist Movements and the Influence of the UN Decade for Women (1975–1985)

The period from Morocco's post-colonial transition in 1956 through the decade of 1975–1985 marked a foundational era in the evolution of Moroccan feminist activism (Sadiqi, 2008). This formative phase unfolded against a backdrop of a newly independent state, the consolidation of monarchical power, the institutionalization of conservative family law, and the emergence—though often tentative—of women's rights discourse (Sadiqi, 2008; Charrad, 2001). Morocco's early post-independence landscape was characterized by both opportunities and constraints for women: while education and public visibility for urban women slowly expanded, the promulgation of the 1957–58 *Mudawana* (Personal Status Code) codified patriarchal norms, requiring obedience to husbands and restricting women's legal autonomy (Sadiqi, 2008; Glacier, 2013). This legal conservatism, rooted in a Maliki interpretation of Sharia and reinforced by the monarchy's pursuit of religious legitimacy, effectively limited women's citizenship and entrenched gender hierarchy within the national project (Charrad, 2001). Within this context, the first wave of Moroccan feminist

activism began to coalesce during the 1960s and 1970s. Pioneering urban women, often the first generation to benefit from formal education, sought greater rights and visibility. Early efforts were closely tied to nationalist movements and political parties, but women's post-independence disappointment was palpable, as participation in the struggle for liberation yielded few legal gains (Sadiqi, 2013). Organizations such as the Union Progressiste des Femmes Marocaines (1962) and the Union Nationale des Femmes Marocaines (1969) reflected the aspirations of urban, educated elites, yet their influence remained circumscribed by male-dominated party structures and prevailing socio-cultural norms (Sadiqi, 2008). As Fatima Sadiqi (2013) observes, the initial interest in women's education and public engagement often reflected the pursuit of social prestige rather than genuine empowerment, and feminist demands, such as the abolition of polygamy or equal rights in marriage, were rarely prioritized by policymakers.

The global surge in feminist thought and organizing during the United Nations Decade for Women (1975–1985) created unprecedented opportunities for Moroccan activists. The declaration of International Women's Year in 1975, and the subsequent sequence of world conferences (Mexico City, 1975; Copenhagen, 1980; Nairobi, 1985), enabled Moroccan women to connect with international models of advocacy, exchange ideas with activists from diverse contexts, and learn new strategies for legal and policy reform (Sadiqi, 2008). Participation in these international forums exposed Moroccan feminists to global legal standards such as CEDAW (ratified by Morocco in 1993) and provided practical templates for both coalition-building and grassroots engagement. A defining feature of this period was the founding of Morocco's first independent feminist organizations. The Association Démocratique des Femmes du Maroc (ADFM), established in 1985, deliberately positioned itself as an autonomous advocate for women's rights, eschewing party or union affiliations (Sadiqi, 2008; ADFM, n.d.). Shortly thereafter, the Union de l'Action Féminine (UAF) emerged, prioritizing family law reform, education, and women's political participation (Sadiqi, 2008). Both organizations developed sophisticated advocacy strategies, drawing on international legal instruments (such as CEDAW and the Nairobi Forward-Looking Strategies) while also carefully framing their demands within culturally resonant discourses—often combining Islamic principles with human rights norms to counter claims of “Westernization” (Sadiqi, 2008). The decade also saw the formation of

regional alliances such as Collectif 95 Maghreb-Égalité, which brought together Moroccan, Algerian, and Tunisian feminists to develop shared policy models and advocate for reform across the Maghreb (Evrard, 2014). These transnational connections, initially catalyzed by participation in UN conferences, facilitated the flow of both ideas and resources, further internationalizing and strengthening Moroccan feminist advocacy (Evrard, 2014).

Despite these advances, persistent challenges remained. Moroccan feminists—particularly those in ADFM and UAF—struggled to democratize their movements beyond urban elites and to mobilize support in more conservative or rural areas (Evrard, 2014). Conservative groups often accused feminist organizations of promoting foreign values, prompting activists to further develop hybrid advocacy frameworks capable of building legitimacy both locally and internationally (Evrard, 2014). These ongoing tensions highlighted both the adaptability and the limits of transnational engagement in affecting legal and social change at home. So, the formative years of Moroccan feminist activism, culminating in and shaped by the UN Decade for Women, established the intellectual, organizational, and strategic foundations for later achievements, most notably the 2004 Mudawana reform. By building robust coalitions, engaging international legal instruments, and pioneering hybrid discourses, Moroccan feminists constructed a resilient and adaptive movement capable of both leveraging global resources and responding to local realities. This dynamic interplay between the local and the global, the secular and the religious, and the elite and the grassroots, stands as a defining legacy of this transformative period in Moroccan women's activism (Evrard, 2014).

3.3. Moroccan Feminist Movements' Participation in Global Feminist Networks

Moroccan feminist movements have emerged as active and influential participants within global feminist networks, not only absorbing but also reshaping international discourses on women's rights. Their engagement with global feminism has evolved through a dynamic two-way exchange, deeply informed by Morocco's unique historical, political, and cultural context (Sadiqi, 2014; Evrard, 2014). This relationship became especially pronounced from the mid-1970s onward, as Moroccan activists increasingly capitalized on international opportunities for coalition-building, capacity development, and policy advocacy. The United Nations Decade for Women (1975–1985) provided an unprecedented platform for Moroccan feminists to interact

with international partners and absorb new advocacy methods (Moghadam, 2003). Participation in world conferences, Mexico City (1975), Copenhagen (1980), Nairobi (1985), and Beijing (1995), introduced Moroccan activists to global debates on legal reform, gender-based violence, and universal rights, catalyzing the formation of independent feminist organizations. These encounters fostered both practical alliances and ideological shifts, as Moroccan delegations, comprising both state representatives and grassroots actors, encountered a diversity of feminist perspectives, particularly during the pivotal Nairobi conference (Sadiqi, 2008; Evrard, 2014). Engagement in transnational networks soon followed and a landmark moment was the formation of Collectif 95 Maghreb-Égalité in 1991, a coalition uniting activist from Algeria, Tunisia, and Morocco to coordinate regional strategies ahead of the 1995 Beijing Conference (Evrard, 2014). This network prioritized violence against women, legal harmonization, and CEDAW ratification campaigns, leveraging the language of democratization and citizenship to bridge gaps between local contexts and the international rights regime. The Moroccan Association Démocratique des Femmes du Maroc (ADFM), a founding member of both Collectif 95 and Women Living Under Muslim Laws (WLUML), played a central role in these campaigns, exemplifying the sophisticated navigation of transnational spaces by Moroccan feminist organizations (Sadiqi, 2014). Moroccan feminists also translated international legal standards into local reform demands. The ratification of CEDAW in 1993, albeit with reservations, demonstrated a deliberate strategy to use global legitimacy to press for domestic change. Through persistent advocacy, including “parallel reports” submitted to the UN and large-scale campaigns such as the One Million Signatures Campaign against the Mudawana (Family Code), Moroccan feminists not only aligned their agendas with international frameworks but localized their arguments through progressive readings of Islamic law and appeals to national values (Sadiqi, 2014; Salime, 2011). This hybrid discourse enabled activists to counter accusations of “Westernization,” build broader societal support, and demystify the “sacredness” of Shari’a in legal matters (Sadiqi, 2008).

Beyond advocacy, Moroccan feminist actors were deeply involved in knowledge production, both through academic scholarship and public engagement. They offered feminist interpretations of Islamic fiqh and produced research that made women’s rights claims accessible to wider audiences, enhancing their credibility in

both domestic and global debates (Sadiqi, 2014). Furthermore, by the late 1990s and early 2000s, these organizations were not just recipients of international influence but had become important contributors to transnational feminist theory and practice, especially regarding strategies for reconciling religious tradition with universal rights (Sadiqi & Ennaji, 2006). The reach of Moroccan activism expanded further through the internet and social media, which facilitated global networking and allowed new generations, such as those involved in the 20 February Movement, to connect and mobilize rapidly. Moroccan feminists' leadership in cross-regional campaigns like "Equality Without Reservation" (2011) illustrates their ability to catalyze collective action across the MENA region, especially around CEDAW ratification and constitutional reforms. Importantly, Moroccan feminist engagement with global networks was never merely derivative. Moroccan activists strategically localized universal rights language adapted global discourses to resonate with local realities, and actively contributed to the global feminist agenda, particularly in the areas of legal reform and advocacy for Muslim-majority contexts (Evrard, 2014). This agency challenges the narrative of feminism as a one-way flow from "West to Rest," demonstrating instead a vibrant multi-directionality in which Moroccan actors are both learners and leaders. Nevertheless, the impact of transnational participation was not without limitations. Many Moroccan organizations struggled to democratize their reach beyond urban, educated elites, with grassroots and rural mobilization remaining uneven (Evrard, 2014). Internal debates about the relevance and risks of "Islamizing" feminist strategies or accommodating donor-driven agendas continue to shape the field, even as international engagement has brought crucial resources and legitimacy. Moroccan feminist movements' participation in global feminist networks has been both transformative and dialogical. Through strategic engagement, adaptation, and innovation, Moroccan feminists have leveraged global resources to effect domestic legal change, contributed new perspectives to transnational debates, and advanced an approach to activism that bridges secular and religious, local and international divides. Their experience offers a rich case study in how feminist movements from the Global South not only participate in but also shape the global trajectory of women's rights advocacy (Evrard, 2014).

3.4. Role of International Organizations (UN Agencies and NGOs) in Supporting Moroccan Feminist Movements

The expansion and impact of Moroccan feminist movements over the last four decades cannot be understood without reference to the significant, and often transformative, involvement of international organizations, particularly UN agencies and international non-governmental organizations (NGOs). Their role has ranged from providing critical financial and technical support to influencing the framing of legal and policy reforms, fostering capacity-building, and legitimizing Moroccan feminist activism both domestically and abroad.

1- Financial and Resource Support:

International organizations have played an essential role in the survival and flourishing of Moroccan women's rights NGOs (WRNGOs) through substantial financial assistance. Donor agencies from the United States, US Agency For International Development (USAID) (Sadiqi, 2014), Denmark, the Netherlands, Canada, Germany, Sweden, and various UN bodies such as UNDP, UN Women (formerly UNIFEM), and UNICEF have directly funded Moroccan NGOs, frequently bypassing state channels to ensure the independence and efficacy of these organizations (Lamrani & Tounsi, 2012). Off-budget aid has enabled Women's Rights Non-Governmental Organizations to initiate legal reform campaigns, operate shelters, run educational programs, and develop multi-sector projects targeting violence against women (Lamrani & Tounsi, 2012). Partnerships with international NGOs, such as Global Rights and Oxfam (Sakthivel, 2015), have further contributed expertise, technical resources, and grant support for specific initiatives, such as library development, legal literacy, and rights-based public education.

2- Advocacy Platforms:

UN conferences and international events have provided Moroccan feminist movements with unprecedented visibility and legitimacy. Participation in landmark events, the UN Decade for Women (1975–1985), world conferences in Mexico City (1975), Copenhagen (1980), Nairobi (1985), and Beijing (1995), elevated the profile of Moroccan NGOs and facilitated their recognition as indispensable actors in both the national and international arenas (Sadiqi, 2008; Salime, 2011). UN-backed international legal standards, particularly CEDAW, became focal points for Moroccan

advocacy (Sadiqi & Ennaji, 2006). The ratification of CEDAW in 1993, Morocco's later lifting of reservations, and the endorsement of the Optional Protocol in 2011 were all the result of coordinated campaigns that leveraged the legitimacy conferred by these global norms (Lamrani & Tounsi, 2012). The practice of submitting parallel or "shadow" reports to UN committees by organizations such as ADFM has enabled Moroccan NGOs to challenge official state narratives and bring international scrutiny to bear on government practices (Salime, 2011). This engagement has also strengthened the position of feminist NGOs in domestic policy debates, compelling the Moroccan government to prioritize women's rights as part of its international reputation management.

3- Influence on Legal and Policy Reforms:

International organizations have provided both the impetus and the strategic frameworks for landmark reforms in Moroccan women's rights, most notably the 2004 revision of the Mudawwana (Family Code). UN agencies and global donors, in cooperation with Moroccan NGOs, promoted the "Women in Development" (WID) paradigm, encouraging the Moroccan state to align social programs and legal reforms with global standards of gender equality (Salime, 2011). Localizing and translating international norms and legal frameworks by activists have been especially vital for advocacy campaigns (Sadiqi, 2008), such as the One Million Signatures campaign against the Mudawwana (Evrard, 2014). Providing organizational resources, training, and transnational advocacy strategies (Evrard, 2014). UN agencies have also facilitated multi-sector initiatives addressing violence against women and promoting gender equality in education, health, and political participation. These organizations have not only supported legislative advocacy but have also enabled Moroccan NGOs to monitor policy implementation and pursue legal literacy campaigns to ensure reforms are internalized by the broader public (UNIFEM, 2003).

4- Capacity Building and Network Formation:

A less visible but equally important contribution of international organizations lies in capacity building and network development. Training, technical assistance, and partnership programs initiated by the UN and major international NGOs have helped Moroccan women's rights groups refine their advocacy techniques, improve organizational management, and professionalize their outreach (Lamrani & Tounsi, 2012). These actors have facilitated the formation of strong national and transnational

networks, such as Collectif 95 Maghreb-Égalité and Equality Without Reservation, allowing Moroccan NGOs to collaborate regionally and globally, share best practices, and mount joint campaigns for legal and policy reform (Sadiqi, 2014; Salime, 2011).

3.5. Policy Advocacy and Legal Reform Outcomes (1975–2004)

The 2004 reform of the Mudawana, Morocco's Personal Status Code, remains a landmark achievement in North African women's rights history, not simply for its content but for the intricate, multi-layered advocacy that made it possible. The next section analyzes the chronological process of reform, the interplay of global and local strategies, the precise legal changes and their significance, and the reform's real-world impact as experienced by Moroccan women across diverse social settings. Feminist advocacy for family law reform was neither linear nor uncontested. In the decades preceding 2004, in 1993 Mudawwana Amendments introduced limited changes to the Family Law, including requiring a woman's consent for marriage, allowing women over 21 without a father to marry without a tutor, and initiating a family counseling institution, among other changes that abolished a father's right to force his daughter into marriage and was a symbol of entrenched gender inequality, with women's legal status largely determined by patriarchal interpretations of Islamic law (Sadiqi, 2014). Early initiatives for reform began in the late 1970s, influenced by Morocco's participation in the UN Decade for Women and global feminist networks (Salime, 2011; Evrard, 2014). The establishment of ADFM in 1985 and UAF in 1987 represented a watershed moment in Moroccan civil society. Both groups took different approaches, ADFM focused on legal literacy and coalition-building, while UAF prioritized mass mobilization and public campaigns (Sadiqi, 2017; Salime, 2011). The March for Equality in Rabat (March 12, 2000), of which the number of participants was heavily disputed, with estimates ranging from four hundred thousand, a New York Times estimate, to half a million participants, exemplified public demand for reform and was widely covered in both local and international media (Salime, 2011). Feminist activists also organized town-hall meetings, collecting testimonials and building a groundswell of support. The 2004 Mudawana reforms were the product of extensive consultation, negotiation, and compromise between feminists, religious scholars, legal experts, and the monarchy.

The most consequential changes in the family code Mudawana, clause-by-clause, are as follows:

See (Buskens, 2010) and (Human Rights Education Associates [HREA], 2004):

- Marriage age: Raised from 15 to 18 for women (Article 19), explicitly recognizing women's capacity for independent decision-making and aiming to curb child marriage.
 - Before: Girls as young as 15 could legally marry, often under family or societal pressure.
 - After: Judges can only authorize underage marriages in exceptional circumstances and must provide a written justification.
- Polygamy: Subjected to strict judicial review (Articles 40–46), requiring the first wife's explicit consent and proof of economic capacity; in practice, this made polygamy exceedingly rare.
 - Before: Polygamy was a male prerogative, with little to no legal challenge.
 - After: Courts have reportedly rejected most polygamy requests post-2004 (Menin, 2019).
- Guardianship in Marriage: Abolished the requirement for a woman's male guardian (wali) to approve her marriage (Article 24), affirming the legal autonomy of adult women.
 - Before: An adult woman could not marry without her father or male relative's approval.
 - After: Women gained the right to contract their own marriages.
- Divorce: Instituted judicial divorce, allowing both men and women to initiate divorce under several forms—divorce by mutual consent, for harm, or by repudiation—but with full judicial oversight (Articles 78–128).
 - Before: Men could repudiate (talaq) a wife unilaterally; women's options were extremely limited.
 - After: Both spouses have equal access to divorce, and all cases must be processed in court.

- **Child Custody and Maintenance:** Expanded mothers' rights to custody, established clearer guidelines for maintenance, and mandated that children's interests be prioritized in custody decisions (Articles 166–179).

In addition to the landmark 2004 Mudawwana reforms, Morocco experienced several significant legal reforms in women's rights during the preceding decades, reflecting progressive legislative responses to national activism, international advocacy, and human rights standards. Notable among these are the 1992 constitutional reforms explicitly introducing human rights language into the constitutional preamble, thus embedding women's rights within a broader human rights discourse (Buskens, 2010). The subsequent ratification of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) in 1993, despite reservations on family and marriage matters, marked Morocco's commitment to aligning national law with international norms (Sadiqi, 2008). Additionally, the introduction of a parliamentary quota system in 2002 ensured at least 10% female representation, significantly enhancing women's political participation (Sadiqi, 2014). Collectively, these legal advancements underscore a gradual yet significant trajectory towards gender equality, complementing and setting the stage for the comprehensive reforms realized in 2004.

Summary of Pre-2004 Legal Changes:

- **1992:** Constitutional reforms introducing human rights framework.
- **1993:** Ratification of CEDAW with reservations.
- **1993:** Amendments to Mudawwana (family law), requiring women's consent to marriage.
- **2002:** Rising Parliamentary quota system established for female representation by 10%.

These reforms were not merely legalistic achievements; rather, they represented the culmination of sustained feminist activism, transnational collaborations and intricate negotiations (Sadiqi & Ennaji, 2006). King Mohammed VI, and his title as *Amir al-Mu'minin* (Commander of the Faithful), strategically legitimized these changes by aligning them with Islamic values, explicitly invoking the Maliki jurisprudential tradition known for its adaptability, moderation, and compassion (Sakhivel, 2015). By framing the reforms within this Islamic paradigm,

it effectively reconciled with progressive gender rights advancements with prevailing religious and socio-cultural norms, facilitating broader societal acceptance and minimizing resistance.

The 2008 Concluding Observations of the Committee on the Elimination of Discrimination against Women (CEDAW/C/MAR/CO/4) acknowledge that Morocco's 2004 Family Code (Mudawana) represented a significant legal advance in the effort to eliminate formal discrimination against women. The Committee commended the state for adopting a series of major legislative reforms, including the Family Code, the Nationality Law, the Labour Code, the Law on Civil Registration, and amendments to the Penal Procedure Code, alongside the work of the Royal Commission on the Personal Status Code. Notable achievements within the Mudawana include the establishment of 18 as the minimum legal age of marriage for both women and men, which the Committee recognized as a key step toward gender equality. The evaluation also highlights parallel reforms that strengthened women's legal status, such as granting children born to Moroccan mothers the right to acquire their mother's nationality. Beyond the legal domain, the Committee welcomed the adoption of national strategies on gender equality, violence against women, and universal basic education, as well as the institutionalization of bodies such as the Conseil Consultatif des Droits de l'Homme, Diwan Al Madhâlim (Ombudsman), and the Instance Équité et Réconciliation. These developments, along with increased political representation, such as the election of 30 women to Parliament in 2002, were viewed as evidence of Morocco's broader commitment to improving women's rights and aligning domestic policy with international human rights standards.

3.6. Limitations of Policy and Legal Advocacy in Morocco (1975–2004)

Despite the Legal reforms achieved by women activism and transnational collaborations, significant implementation challenges have persisted, particularly along regional and socioeconomic lines. Scholars such as Charrad (2001) highlight that in North Africa, including Morocco, family law reforms frequently encounter resistance at the local level, especially where customary law or religious authority holds sway over the formal state. This means that the practical impact of legal change is often limited in rural or conservative areas. Enforcement gaps remain a central challenge. Although the revised Mudawana sets the minimum marriage age at 18, judges retained discretionary authority to grant exceptions for underage marriages. By

the end of the decade, thousands of such exceptions were still being issued annually (Zvan Elliott, 2015). Critics argue that this judicial discretion sometimes undermines the intent of the reform by allowing local norms and familial pressures to override statutory protections for girls and young women. Moreover, Salime (2011) and Charrad (2001) observe that the most visible beneficiaries of the reforms have often been urban, educated women with access to legal resources and connections to international NGOs. In contrast, working-class and rural women have frequently faced barriers such as lack of legal awareness, limited financial means, and ongoing dependence on male family members in legal proceedings, which have hampered their ability to benefit fully from the new legal framework (Zvan Elliott, 2014).

Throughout the 2000s, UN agencies such as UNIFEM and UNDP (predecessors to UN Women), together with the World Bank, supported Morocco's legal reform efforts in legal literacy campaigns, training judges and legal professionals (Evrard, 2014; Zvan Elliott, 2015). However, evaluations from this period indicate that such training programs were not always comprehensive or sustained, and that local courts remained key battlegrounds where patriarchal interpretations could persist. Zvan Elliott (2015), also argue that the central role of the monarchy in the reform process was double-edged: it facilitated legislative passage but also consolidated state control over women's rights agendas. Others, such as Sadiqi (2014) and Salime (2011), contend that lasting progress requires feminist activism to move beyond legislative advocacy and address broader social, economic, and cultural obstacles to women's empowerment.

The 2008 CEDAW evaluation (CEDAW/C/MAR/CO/4) identifies critical areas where discrimination persists and implementation remains uneven. The Committee expresses concern that several provisions of the Family Code continue to undermine women's substantive equality. These include the judicial exception allowing marriage below the age of 18—an exception widely granted in practice, resulting in a high number of approved child marriages, including cases involving girls as young as 13. The Committee also criticizes the continued legality of polygamy, even under judicial control, noting that it violates women's equality rights and urging Morocco to amend the Code to prohibit it. Additional concerns relate to economic inequality within marriage and divorce, as the Family Code's default system of separate property disproportionately disadvantages women and fails to ensure

equitable distribution of marital assets. Persistent discrimination was also noted in matters of custody, guardianship, and inheritance. Beyond substantive content, the Committee stresses significant implementation gaps, emphasizing that the Family Code is not consistently known, understood, or applied, particularly in rural regions and among segments of the judiciary. Further concerns relate to Morocco's unclear constitutional status of international conventions, the incomplete withdrawal of its reservations to key CEDAW articles (particularly Article 16, which encompasses inheritance, guardianship and property), and the lack of detailed data on legal remedies and discrimination cases. These findings underscore a central reality: while the 2004 reform marked a legal turning point, its transformative potential remains constrained by judicial discretion, unequal enforcement, and the coexistence of statutory law with entrenched customary and religious norms.

3.7. Local Resistance and Challenges in Implementing Reforms

While Morocco's 2004 Mudawana reform was internationally recognized as a landmark in advancing women's rights, its implementation has faced ongoing resistance and significant local challenges. The gap between formal law and lived reality reflects a complex interplay of socio-cultural, religious, and institutional factors (Zvan Elliott, 2015). Many rural and semi-urban communities have remained deeply attached to traditional norms and patriarchal structures, which can limit the reach of legal reforms. As documented by Zvan Elliott (2014), local religious leaders and community elders sometimes contest the legitimacy of the Mudawana reforms, emphasizing customary practices and interpretations of Shari'a that predate the new law. These dynamics have led families to resolve disputes informally rather than use state courts, preserving established gender hierarchies. Religious discourse also plays a role, as Sadiqi (2008) notes, some imams and preachers have framed the 2004 reforms as influenced by foreign or "Western" agendas, rather than as organic national progress, which can reinforce community skepticism toward the new family law. Legal awareness and access to justice have been major obstacles to effective implementation, especially in rural areas. Surveys and field research consistently show that rural women are less likely to know their rights under the new Mudawana or to access legal support (Zvan Elliott, 2015; Sadiqi, 2008). Distance to courts, transportation costs, and lack of legal aid further exacerbate these barriers, leading many women to abandon or forgo claims, particularly in cases involving divorce, child custody, or inheritance.

Judicial discretion is another critical issue, although Mudawana set the minimum marriage age at 18, judges have continued to grant exceptions, sometimes under community or familial pressure, resulting in ongoing cases of child marriage even after the 2004 official reform (Zvan Elliott, 2015). Personal beliefs and interpretations among judges lead to significant regional variations in how the law is applied, with more conservative courts in rural provinces often reverting to pre-reform practices (Buskens, 2010).

Despite training efforts supported by international agencies, such as UNIFEM and UNDP, state capacity remains uneven, particularly in remote or under-resourced areas (Evrard, 2014; Zvan Elliott, 2015). Many family courts lack female judges, social workers, or adequate facilities, which can discourage women from seeking legal recourse. Monitoring and enforcement of court decisions have been inconsistent, allowing practices such as child marriage or informal divorce to persist in some communities (Sadiqi, 2008). Urban–rural comparisons show that legal literacy campaigns and NGO support in cities such as Casablanca have led to greater awareness and use of the Mudawana, while patriarchal traditions remain deeply rooted in rural regions, limiting women’s ability to benefit from reforms. Zvan Elliott (2015) and Salime (2011) emphasize that top-down legal reforms, while essential, are insufficient on their own; genuine transformation also requires investment in education, public awareness, and social support. According to Human Rights Watch (2006), concerns remain about the judiciary’s limited familiarity with the reforms and about a legal loophole that allows judges to rely on religious principles when deciding matters not explicitly covered in the text (Human Watch, 2006). In comparison to Tunisia, where post-reform campaigns for legal awareness and access to justice were more systematically implemented, Morocco’s approach left significant gaps in Implementation especially for the most vulnerable women (Charrad, 2011). To address these divides, scholars and advocates recommend prioritizing rural legal literacy, grassroots organizing, and sustaining judicial training and oversight (Salime, 2011; Sadiqi, 2014).

4. TURKISH WOMEN'S ACTIVISM, GLOBAL FEMINIST ENGAGEMENT AND OUTCOMES (1975–2004)

4.1. Socio-Political Changes from the Late Republican Era to (1975)

The foundations of Türkiye's modern gender politics were laid in the early Republican era, as sweeping reforms following the establishment of the secular Turkish Republic in 1923 transformed women's legal status. The adoption of the Swiss Civil Code in 1926 prohibited polygamy, instituted compulsory civil marriage, recognized divorce rights for both partners, and established gender equality in inheritance and guardianship, placing Türkiye ahead of many Muslim-majority countries in codified women's rights (Arat, 1994; Tekeli, 1982). Women gained suffrage in 1934, allowing them to participate in political life nationally and locally. However, these reforms were part of a top-down "state feminism," in which women's activism was encouraged only as long as it served the state's modernizing, nation-building agenda. Efforts at autonomous organizations such as the Women's People's Party in 1923 were suppressed, and independent women's organizations were either co-opted or dissolved when they sought to move beyond state control (Arat, 1994). Turkish secularism, modeled on French Jacobin laicism, aimed not simply to separate religion from the state but to actively reshape the public role of Islam, including in matters of gender and family. This approach facilitated Westernization but paid little attention to securing individual religious freedoms, a legacy that continues to influence gender politics in Türkiye (Arat, 2010). Despite progressive rhetoric and legal advances, the early Republican system remained undemocratic in key respects, women's public participation was mediated through state-sanctioned institutions, and the reach of reforms was limited by class, region, and tradition (Tekeli, 1992; Arat, 1994). Throughout the single-party era, women's organizations remained largely philanthropic or professional, rather than independent advocates.

The transition to a multi-party system in the 1950s brought greater diversity to Turkish politics, but women's parliamentary representation declined, and activism was largely confined to professional and charitable associations. During the 1960s and 1970s, Kemalist women's organizations, such as the Turkish Association for Women in Legal Professions and the Zonta Business and Professional Women's Association, mobilized collectively for civil code reform and workplace equality, drafting

legislative proposals and organizing public campaigns (Adak & Çağatay, 2023). Nonetheless, critics within the women's movement and feminist scholars increasingly highlighted the persistence of patriarchal biases in both law and daily life (Kandiyoti, 1988). As Deniz Kandiyoti (1987) influentially observed, Turkish women were often "emancipated but unliberated", granted formal rights from above, but denied full autonomy or meaningful recognition in social, economic, and political life. The Civil Code continued to identify the husband as the head of the family, and the Criminal Code maintained inequalities, such as differing standards in cases of adultery. The state discouraged activism beyond its control and reinforced patriarchal structures in the family, education, and economy. Kandiyoti's analysis of "classic patriarchy" (1988) emphasized that women's labor and reproductive roles were appropriated by the patrilineal family, with older women's authority rooted in their control over younger women, ultimately reinforcing male dominance. By the late 1970s, these limitations became the focus of a more critical feminist analysis. Activists began to insist that state-led emancipation was insufficient without substantive liberation, real autonomy, the recognition of women's diverse contributions, and freedom from patriarchal control in both public and private life were essential (Arat, 1994). This shift set the stage for the emergence of a more independent and globally connected feminist movement in Türkiye, which would come to fuller expression in the following decade.

4.2. Turkish Feminist Movements and Responses to Global Initiatives During the UN Decade for Women (1976-1985)

Among the oldest and most continuously active organizations in Turkish women's activism is the Türk Kadınlar Birliği (Turkish Women's Union, TKB), founded in 1924. TKB played a foundational and bridging role through all periods of modern Turkish history, including during the UN Decade for Women. It was deeply involved in the landmark Women's Year Congress of 1975 and continued to advocate for legal reform, gender equality, and the expansion of women's rights across changing political climates and regimes. Its efforts consistently prioritized legal reform advocacy and policy negotiation, making it one of the central actors in campaigns to amend the Turkish Civil and Penal Codes and to bring national laws in line with international standards (Adak & Çağatay, 2023). A second major organization, the Türkiye Kadın Dernekleri Federasyonu (Federation of Women's Associations of Türkiye, TKDF), was established in 1976 directly as an outcome of the International

Women's Year. As the main umbrella and network for women's groups throughout the country, TKDF became a powerful institutional hub, especially in the late 1970s and 1980s, for coordinating mass campaigns, mobilizing grassroots support, and advocating for legal and policy reforms (Adak & Çağatay, 2023). TKDF was instrumental in Türkiye's engagement with international gender equality processes and led advocacy efforts for reforms related to family law, violence against women, and employment rights (Adak & Çağatay, 2023). However, the Turkish women's movement is not limited to these two historical organizations. The late 1970s and especially the 1980s saw the rise of new, independent, and often more radical groups that provided fresh impetus and strategies for feminist activism. Among these, Kadın Çevresi (Women's Circle) emerged in the early 1980s as one of the autonomous feminist collectives, focusing on consciousness-raising, public education, and challenging patriarchal norms not only in law but in everyday life (Adak & Çağatay, 2023, p.727). Kadın Çevresi was significant as a catalyst for the "second wave" feminist discourse and helped lay the groundwork for later campaigns on legal reform and bodily autonomy and international engagement (Moralioğlu, 2012; Sirman, 1989, p.17\18). In the 1990s and onward, Mor Çatı Kadın Sığınağı Vakfı (Purple Roof Women's Shelter Foundation) became especially critical in the field of shelter activism and violence prevention. Founded in 1990 in response to the growing recognition of domestic violence as a feminist issue, Mor Çatı not only provided direct support and safe spaces for women but also contributed substantially to the feminist policy agenda by collecting data, raising public awareness, and advocating for more robust legal protections and state responsibility in addressing gender-based violence (Diner & Toktaş, 2010). Although its primary focus was shelter and support, Mor Çatı also participated in legal advocacy—especially around violence prevention legislation and the reform of the Penal Code.

While TKB and TKDF remained the principal institutional advocates for legal and policy reforms at the national level, these supporting organizations, including Kadın Çevresi and Mor Çatı, acted as catalysts, expanding the movement's agenda and introducing new forms of activism that would ultimately strengthen and diversify Turkish women's rights advocacy. They led or coordinated major campaigns for policy reforms, engaged in public education on women's legal rights, and acted as interlocutors with state authorities and international bodies. Kadın Çevresi contributed

through public education and changing societal attitudes, while Mor Çatı focused on legal advocacy related to violence but less on general legal reforms. Together, this institutional ecosystem allowed the Turkish women's movement to be both deeply rooted in national tradition and adaptive to global feminist trends (Tekeli, 1994; Arat, 1994; Diner & Toktaş, 2010). The UN Decade for Women (1976–1985) marked a watershed moment for the evolution of feminist activism in Türkiye, serving as both a catalyst for new forms of organization and advocacy and a context for reconfiguring older traditions of Kemalist women's organizing. Turkish women's associations, particularly those rooted in the Kemalist tradition, did not passively receive the global call for gender equality; rather, they responded with proactive, coordinated, and nationally visible initiatives designed to advance women's rights and align Türkiye with international standards (Adak & Çağatay, 2023). One of the earliest and most visible responses was the Women's Year Congress of 1975, organized in direct alignment with the UN's designation of 1975 as International Women's Year. This event brought together a wide range of women's organizations, professional associations, and individual activists in Ankara, and represented the first truly national gathering of Turkish women to collectively assess their situation and strategize for the future. The Congress was especially notable for producing a National Action Plan, a comprehensive document addressing issues such as education, law, health, art, and the economy, and proposing solutions that were increasingly framed in feminist terms (Adak & Çağatay, 2023). This marked a shift from purely philanthropic or state-aligned women's organizing toward a more programmatic and rights-based approach, directly inspired by the global agenda of the UN Decade.

Building on this momentum, the establishment of the Türkiye Kadın Dernekleri Federasyonu (Federation of Women's Associations of Türkiye, TKDF) in 1976 was a critical institutional development. Formed as a direct outcome of the 1975 Congress, the TKDF served as the first national umbrella organization for women's associations in Türkiye. Its explicit aim was to monitor and advocate for Türkiye's commitments under the UN Decade for Women, and to act as a coordinating body for advocacy, networking, and follow-up on national and international gender equality goals (Adak & Çağatay, 2023). The creation of the TKDF demonstrates how Turkish activists translated the impetus of the UN Decade into lasting organizational infrastructure—providing a platform for mass mobilization, collective advocacy, and alignment with

global feminist priorities. Throughout this period, Kemalist women's organizations such as the Türk Kadınlar Birliği (TKB, Turkish Women's Union) intensified their advocacy for legal and policy reforms. The TKB, re-established in 1949 but with roots reaching back to the early Republic, had already launched the "Women Demand Full Equality" campaign in 1969, pushing for amendments to the Civil Code to improve women's labor market access (Adak & Çağatay, 2023, p. 732). These campaigns continued throughout the 1970s and into the Decade, with groups like the Association of Turkish University Women and the Turkish Association for Women in Legal Professions playing visible roles in publishing reports, drafting bills, organizing conferences, and recruiting women lawyers and academics into official commissions debating legal reforms (Adak & Çağatay, 2023). This sustained advocacy not only kept women's rights on the national agenda but also created the conditions for the emergence of more autonomous feminist activism in the 1980s and beyond.

The influence of the UN-led global gender equality agenda extended beyond campaign slogans or organizational models; it fundamentally shaped the self-understanding and public strategies of Kemalist women's groups. As Adak and Çağatay (2023) argue, the international context, especially the rise of women's studies as an academic field, provided new conceptual resources and legitimacy for activists who sought to link Turkish women's struggles with a universal human rights discourse. Although some scholars such as Şirin Tekeli (1992) have claimed that Turkish women's organizations wielded limited influence prior to 1980, Adak and Çağatay (2023) that is more recent research highlights the continuity and resilience of women's activism during these decades, particularly as it was energized by engagement with global initiatives.

A further hallmark of the Turkish response was the collaboration between women's associations and the state, particularly in the late 1970s and early 1980s. Kemalist women did not simply organize in opposition to official policy; rather, they frequently worked within mixed-gender professional bodies, parliamentary commissions, and state structures to promote gender equality legislation and insert women's demands into policy debates. This collaborative, but not uncritical, relationship with the state reflects both the legacy of earlier state feminism and the pragmatic recognition of the state's continuing importance for legal reform (Çelik & Saritunali, 2022; Adak & Çağatay, 2023). In parallel, the 1970s also witnessed a

significant mobilization among socialist and left-leaning women, whose activism, while not always directly tied to the UN Decade, nevertheless benefited from and contributed to the broader momentum around gender equality. These groups pushed for labor rights such as “equal pay for equal work,” the institutionalization of universal childcare, and the recognition of International Women’s Day as a platform for feminist demands (Adak & Çağatay, 2023). The cumulative effect was the emergence of a diverse, multi-vocal, and increasingly self-confident women’s movement, able to leverage both domestic and international resources for advocacy. The response of Turkish women’s organizations to the global initiatives of the UN Decade for Women was characterized by strategic adaptation, proactive institution-building, and intensified advocacy for legal reform. Far from being mere followers of global trends, Turkish feminists appropriated and reworked international frameworks to fit national realities (Tekeli, 1992).

4.3. Role of International Organizations (UN Agencies and NGOs) in Supporting Turkish Feminist Movements

The evolution of feminist activism and women’s rights in Türkiye between 1975 and 2010 cannot be fully understood without situating it in the context of robust engagement with international organizations, particularly the United Nations system, European institutions, and a range of transnational NGOs. These relationships were multi-dimensional, encompassing the adoption of international frameworks, financial and technical support, ideological exchange, and complex donor-driven dynamics, all of which left a lasting imprint on the strategies, discourse, and outcomes of the Turkish women’s movement.

1. International Legal Frameworks and Advocacy Tools

A critical development in the Turkish context was the country’s signing of the United Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) in 1985. CEDAW provided not only a global normative standard but also a concrete set of obligations and a reporting system that Turkish feminists could leverage for domestic advocacy. Following ratification, Turkish women’s organizations initiated a petition campaign in 1986 to pressure the government for effective implementation, highlighting the resonance and political salience of CEDAW within Turkish feminist circles (Arat, 2010). The convention remained a reference point in subsequent political platforms, including the AKP’s 2001 party

program, and Turkish feminists gained a prominent presence at the UN level, participating as committee members and as the UN Special Rapporteur on Violence against Women (Arat, 2010). This pattern demonstrates how global legal instruments, through domestic mobilization and high-level participation, functioned as both advocacy resources and benchmarks for government accountability (Acar & Altunok, 2013). The CEDAW Committee's periodic "Concluding Observations" (2005, 2010) further illustrates the ongoing monitoring and influencing role of international organizations in shaping gender equality debates and legislative reforms.

2. Global Movement Catalysts

The UN International Women's Year in 1975 and the ensuing Decade for Women (1976–1985) marked a foundational turning point for feminist activism in Türkiye. Kemalist women, aligning with this global initiative, convened the Women's Year Congress in Ankara in 1975 and spearheaded the formation of the Federation of Women's Associations of Türkiye in 1976. This not only produced Türkiye's first nationwide umbrella organization for gender equality but also embedded Turkish feminism within the broader networks and momentum of the global women's movement (Adak & Çağatay, 2023). The impact of such global initiatives is seen in the way they catalyzed organizational growth and the articulation of a national feminist agenda, while also fostering international linkages.

3. European Influence, Learning, and Model Transfer

Europe played a dual role for Turkish feminists, as both a practical source of ideas and as a symbolic "oasis" of human rights and democracy (Tekeli, 1992). Turkish activists consistently sought to adapt concepts such as patriarchy, sexism, positive discrimination, and organizational models, autonomous feminist groups, issue-based campaigns, shelters, crisis centers, Women's Studies centers, and women's libraries, from European and broader Western feminist movements (Tekeli, 1992; Öztürkmen, 2013). The efficacy of European feminism in advancing women's rights was deployed as a legitimizing argument domestically, especially in the contested context of Turkish modernity (Adak & Çağatay, 2023).

4. Financial Support, Donor Influence, and the Rise of Project Culture

Transnational engagement was not confined to rhetoric and models; it was materially underpinned by direct financial support from international donors. Notably,

German and Dutch women's organizations provided funds and grants for landmark initiatives such as the Purple Needle Shelter and the Women's Library in Istanbul. International conferences (e.g., the 1989 Kassel conference) further facilitated Turkish scholars' participation through funding from the University of Kassel and other entities. This influx of resources led to what has been termed the "project culture" in Turkish civil society, where activism became increasingly shaped by competition for donor funds and compliance with donor preferences (Acar & Altunok, 2013; Arat, 2010). Closer international ties and the proliferation of external funding created both opportunities (proliferation of NGOs, enhanced capacities, professionalization) and tensions (increased competition, dependence on donors, and the risk of donor-driven priorities overshadowing local needs).

5. Civil Society Networking and International Solidarity

These global connections helped reinforce a vibrant network of NGOs and fostered "bridge-building" between Turkish women and their diasporic counterparts, especially in Europe. The rise of international networking and solidarity helped Turkish feminists gain legitimacy and influence at both national and international levels (Adak & Çağatay, 2023).

4.4. Legal Reform Outcomes (1975–2004)

The period between 1975 and 2004 marked a pivotal phase in the legal history of women's rights in Türkiye. Initially sparked by grassroots mobilization during the UN Decade for Women (1976–1985) and subsequently accelerated by Türkiye's EU candidacy process starting in 1999, Turkish feminist activism achieved comprehensive reforms aimed at dismantling discriminatory legal structures (Tekeli, 1992; Arat, 1994; 2010).

Early advocacy in the 1970s and 1980s focused on labor rights, equality in family law, and reproductive freedoms (Adak & Çağatay, 2023). A critical success was the legalization of abortion in 1983, under the Population Planning Law (No. 2827), allowing abortion on demand for up to ten weeks (Acar & Altunok, 2013).

The European Union candidacy provided crucial external impetus from 1999 onwards, significantly empowering feminist advocacy. This facilitated several groundbreaking legal achievements, notably:

- **2001 – New Civil Code:** Abolished male headship, ensuring full gender equality in marital rights, child custody, inheritance, divorce proceedings, and women’s freedom to work and travel without spousal consent (Arat, 2010; Kandiyoti, 2011).
- **2001, 2004– Constitutional Amendments:** Explicitly prohibited sex-based discrimination, reinforcing gender equality and providing constitutional safeguards for women’s rights (Arat, 2010; Acar & Altunok, 2013).
- **2004 – Comprehensive Penal Code Reform (Law No. 5237):**
 - Criminalized marital rape.
 - Redefined honor killings as aggravated homicide, significantly increasing penalties.
 - Removed discriminatory morality-based provisions, such as reduced sentences for rapists marrying their victims.
 - Criminalized workplace sexual harassment.
 - Banned involuntary virginity testing, safeguarding women's bodily autonomy (Acar & Altunok, 2013; Kandiyoti, 2011).

These legislative reforms substantially transformed the legal landscape for women's rights in Türkiye, addressing longstanding feminist demands dating back decades (Tekeli, 1992; Arat, 1994). The 2004 Penal Code, for instance, marked a profound shift from patriarchal notions of morality toward individual rights and protection, clearly influenced by feminist activism and international human rights standards such as CEDAW (Kandiyoti, 2011). The extensive legal advancements achieved between 1975 and 2004 not only represent landmark feminist victories but also serve as a reminder of the ongoing necessity for continuous advocacy. Feminist scholars and activists recognize these reforms as essential milestones yet underscore that true gender equality requires sustained effort beyond legislative change alone (Arat, 2010).

The 2010 Concluding Observations of the Committee on the Elimination of Discrimination against Women (CEDAW/C/TUR/CO/6) acknowledge that Türkiye’s 2001–2004 legal reform cycle generated notable institutional and legislative advances toward gender equality. The Committee commended the state for adopting a broad range of legislative measures, policy frameworks, and action plans, including the

Gender Equality National Action Plan, the National Strategic Action Plan on Sexual and Reproductive Health, the National Action Plan for Combating Domestic Violence, and the Second National Action Plan to Combat Trafficking. The evaluation also highlights important institutional progress, such as the creation of the Parliamentary Commission on Equal Opportunities for Women and Men, which is tasked with monitoring gender-equality developments and reviewing draft legislation. Additionally, the withdrawal in 2008 of Türkiye's declaration to article 9(1) of CEDAW which is about women's equal rights to pass nationality to their children, following reforms to the Citizenship Law, was recognized as a significant step toward eliminating formal gender-based discrimination (Committee on the Elimination of Discrimination against Women, 2010). The Committee further welcomed the adoption of a constitutional amendment package affirming that temporary special measures aimed at achieving substantive equality are not incompatible with the constitutional principle of equality, thus expanding the legal basis for affirmative action and gender-sensitive policymaking (Committee on the Elimination of Discrimination against Women, 2010).

4.5. Challenges in Feminist Legal and Policy Reform in Türkiye

Despite major achievements in policy advocacy and legal reforms between the mid-1970s and 2004, Turkish feminism faced persistent and evolving challenges in translating legislative gains into substantive and equitable outcomes. One recurring difficulty was the uneven and often limited implementation of reforms across different regions and social strata. While legal changes such as the 2001 Civil Code and 2004 Penal Code amendments signaled progress on paper, actual enforcement was hindered by regional disparities, bureaucratic inertia, and persistent patriarchal attitudes within the judiciary and state apparatus (Acar & Altunok, 2013; Arat, 2010). For instance, the practical effect of reforms depended heavily on the attitudes of local officials and the ability of women to access legal resources—factors that varied widely between urban centers and rural or conservative areas (Acar and Altunok, 2013). Another key challenge was the growing professionalization and NGO-ization of the women's movement, especially after the 1980s. The proliferation of large, formal NGOs like TKDF, and KAMER brought new capacity and visibility but also introduced tensions between professionalized advocacy and grassroots activism. According to Adak and Çağatay (2023, p. 727), the post-1980 reconfiguration of Türkiye's political and

intellectual landscape unfolded alongside the growing influence of Western feminist scholarship, which introduced new analytical tools but also intensified ideological debates over authenticity, autonomy, and representation within the women's movement. In addition to this, as discussed in the IDS Bulletin (Kandiyoti, 2011), the shift in visibility and professionalized advocacy sometimes led to a disconnect between the priorities of well-funded, donor-dependent organizations and the needs or perspectives of more marginalized, intersectional, or rural constituencies. Funding dependence on international and EU donors introduced the risk that advocacy agendas would be shaped more by donor requirements than by the autonomous priorities of local actors, echoing concerns raised in the literature about "double-speak" and the instrumentalization of gender equality discourses (Kandiyoti, 2011, p.13). The state's approach to gender equality also presented obstacles. Even as Türkiye signed and ratified international conventions such as CEDAW and implemented new laws, state-affiliated religious bodies, public bureaucracies, and individual officials at times actively resisted or selectively interpreted gender equality measures. State-affiliated religious authorities, such as the Directorate of Religious Affairs, issued pronouncements discouraging women's employment and reinforcing traditional roles, positions that directly contradicted the spirit and content of recent legal reforms (Arat, 2010). Civil servants in various state institutions, including education, sometimes publicly promoted patriarchal norms (Arat, 2010), and there were documented cases where local officials discouraged or failed to enforce women's rights as guaranteed by new legislation (Arat, 2010).

Further, while the early 2000s saw important legal victories, the persistence of patriarchal norms in both law and society undermined substantive change. For example, the influence of conservative religious discourse within public institutions limited the effectiveness of reforms regarding issues like marital rape, honor crimes, and women's labor force participation and marital violence (Arat, 2010). Legal ambiguity and lack of systematic state monitoring meant that practices such as forced marriage or gender-based violence continued, sometimes unchecked, even after criminalization (Acar & Altunok, 2013, p. 19). Finally, internal debates within the feminist movement, such as those over universalism versus particularism, the meaning of "feminist," and the appropriate relationship to the state and international actors, sometimes hindered the ability to build broad, sustained coalitions for further reform

(Adak & Çağatay, 2023, p. 726). The rise of the "waves metaphor" in feminist scholarship and activism, itself a product of engagement with Western feminism, also shaped and sometimes constrained the framing of Turkish women's struggles, potentially marginalizing alternative forms of activism, such as those within mixed-gender organizations or in partnership with the state. While legislative achievements in Türkiye between 1975 and 2010 represented real progress, significant challenges persisted in the form of uneven implementation, NGO-ization and funding dependence, the persistence of patriarchal norms in state and society, bureaucratic and legal resistance, and internal strategic tensions within the women's movement. These challenges underscore the complex dynamics facing feminist legal and policy reform in Türkiye during this period (Adak & Çağatay, 2023; Arat, 2010; Kandiyoti, 2011).

The 2010 CEDAW evaluation (CEDAW/C/TUR/CO/6) underscores that Türkiye's reform trajectory remains incomplete, marked by enduring discriminatory legal provisions and gaps in enforcement. The Committee expresses concern that key elements of the Penal Code and Civil Code continue to undermine substantive gender equality, including the persistence of non-consensual genital examinations permitted under Article 287 of the Penal Code, and the non-retroactive application of the 2002 Civil Code reform on marital property, which leaves women married prior to 2002 at a structural disadvantage. The evaluation also identifies discriminatory Civil Code provisions related to women's surnames after marriage and the 300-day mandatory waiting period for women to remarry following divorce. Beyond specific legal articles, the Committee stresses the absence of a comprehensive anti-discrimination law aligned with Articles 1 (definition of discrimination against women) and 2 (state obligations towards the elimination of such gender discrimination) of the Convention, noting that existing legislation does not fully define or prohibit gender-based discrimination in all spheres of life. The Committee further highlights the lack of a holistic legal framework on violence against women, urging Türkiye to adopt comprehensive legislation and explicitly classify honor killings as aggravated homicide under Article 82 (lists circumstances in which homicide becomes aggravated murder, leading to heavier penalties) of the Penal Code. Collectively, these concerns reveal a persistent gap between Türkiye's legislative reforms and the Convention's standards, demonstrating how entrenched norms and legislative omissions continue to constrain the full realization of gender equality.

4.6. Societal and Political Backlashes Against Feminist Activism

The period following 2002, marked by the rise of the Justice and Development Party (AKP), witnessed a complex and multi-layered backlash against feminist activism and the broader women's rights agenda in Türkiye. Scholars such as Arat (2010) and Kandiyoti (2011) detail how this backlash manifested through legal reforms, state policy, political rhetoric, and evolving social norms, resulting in both the retrenchment of patriarchal values and the narrowing of secular and feminist spaces. The AKP, while initially continuing the legislative reform momentum of the early 2000s with amendments to the Civil and Penal Codes, increasingly instrumentalized religion and conservative family values in public discourse and policy. Prime Minister Recep Tayyip Erdoğan's explicit public rejection of gender equality, stating in 2010 that he does not believe in the equality of men and women, but rather in their complementarity, shocked and deeply disappointed many women's organizations, signaling a direct challenge from the highest levels of government to the core principle of equality (Kandiyoti, 2011). Despite Türkiye's ratification of CEDAW and the passage of progressive legal reforms earlier in the decade, the AKP government's subsequent policies and bureaucratic appointments often reinforced traditional gender roles and discouraged female labor force participation. Female employment rates declined disproportionately during this period, and social security reforms undermined women's economic independence by restricting access to benefits and incentivizing dependence on husbands (Arat, 2010). State-affiliated bodies such as the Directorate of Religious Affairs further advanced patriarchal norms, issuing guidance on women's dress and conduct, and reinforcing a religiously sanctioned subordination of women. The expansion of mandatory religious education, the softening of penalties for unlicensed Quranic courses, and the use of public funds to promote theology in universities all contributed to the propagation of conservative gender roles through the educational system (Arat, 2010).

Institutional backlash was mirrored by shifts in civil society and public culture. Religious communities, empowered under the AKP, became increasingly active in shaping both educational content and everyday social practices, encouraging piety and domesticity for women and girls (Arat, 2010). In some cases, local officials distributed pamphlets advising female subservience or condoning domestic violence, with only token consequences from party leadership—further emboldening conservative social

norms. Media and public discourse reflected this broader transformation, with rising visibility of headscarves, celebration of religious holidays in secular schools, and the marginalization of secular lifestyles. As Arat (2010) observes, this shift resulted in a “narrowing of the range of choice” for women, as orthodox religious norms were increasingly institutionalized in both policy and social practice (p. 882). Importantly, backlash was not confined to government and civil society but also surfaced within feminist scholarship and historiography itself. Adak and Çağatay (2023) argue that the dominance of the “waves” metaphor, often rooted in Western feminist scholarship and local anti-Kemalist sentiments, led to the exclusion of important forms of women’s activism, particularly those of Kemalist and socialist women, from the mainstream narrative; and this internal historiographical backlash produced “ruptures, discontinuities, and silences” in the collective memory of the women’s movement, obscuring its diversity and the continuities of resistance that spanned different regimes and ideological contexts (p. 738). Collectively, these political, institutional, social, and scholarly backlashes significantly reconfigured the landscape of gender equality and feminist activism in Türkiye after 2002. While legal and rhetorical advances were not entirely reversed, the AKP era witnessed a strategic rollback of feminist gains, a constriction of secular public spaces, and a pronounced contestation over the meaning of gender, rights, and citizenship. This period thus represents not only a challenge to the women’s movement but also a broader struggle over the very contours of modernity, secularism, and democracy in contemporary Türkiye.

5. A COMPARATIVE DISCUSSION OF MOROCCAN AND TURKISH WOMEN'S ACTIVISM

5.1. Comparative Summary of Findings

As the central aim of this thesis has been to comparatively analyze how global and transnational feminist engagements, specifically those initiated during the United Nations Decade for Women (1975–1985), shaped the trajectory of women's activism, policy advocacy, and legal reform in Morocco and Türkiye up to 2004. Guided by the main research question: how these global feminist initiatives and networks influenced concrete policy and legal outcomes in both countries? This study has systematically examined the ways in which women's movements in Morocco and Türkiye engaged with and adapted international feminist frameworks introduced during the UN Decade for Women. In doing so, it has compared the similarities and differences in how global feminist engagements translated into national policy advocacy and legal reforms and evaluated the extent to which these transnational influences fostered transformative change in women's rights. Besides the similarities and differences regarding the challenges and limitations faced in advocacy and the implementations of the reform outcomes. By foregrounding the UN Decade for Women as a pivotal turning point, this thesis situates its comparative analysis within the context of the ongoing interplay between international norms and local activism. Between 1975 and 2004, both Morocco and Türkiye experienced significant, though contested, legal reforms concerning women's rights and family law, propelled by persistent feminist activism and shifting global and local norms. In each context, legal change marked a breakthrough, yet the outcomes reveal profound ongoing challenges in translating law into real equality.

In Morocco, activism by new civil society and women's groups gained momentum in the 1980s, culminating in the high-profile 1991 UAF petition and the eventual overhaul of the *Mudawana*. The 1993 adjustments, though modest and seen by many as largely symbolic, cracked open the notion of unchangeable family law, introducing the requirement for a bride's verbal consent and judicial oversight of polygamy and repudiation. The 2004 reforms, announced by King Mohammed VI and ratified by parliament, represented a comprehensive reworking of the *Mudawana*; they established joint family responsibility, raised the legal marriage age to 18 for both

sexes, sharply restricted polygamy, expanded divorce rights to women, and legally recognized women's economic and household contributions. These changes were celebrated for advancing gender equality within an Islamic framework and garnered strong public support, especially among women. However, implementation of the new code faced persistent challenges; critics noted that reform was top-down and, despite formal equality, real change was slowed by resistance in the judiciary, logistical barriers, and enduring patriarchal norms, especially in rural areas with high illiteracy. The requirement to frame equality within Islamic principles sometimes limited advocacy, and practical gaps remained in areas like the persistence of underage marriages, and violence against women, which remained largely unaddressed in the penal code. Nonetheless, by 2010, public surveys showed clear improvements in women's legal status and agency, even as dissatisfaction remained regarding full implementation.

In Türkiye, women's activism grew increasingly independent and visible after the 1980 coup, as urban feminist groups challenged traditional gender roles, raised public consciousness about violence and discrimination, and institutionalized women's issues within state and academic structures. Legal reforms between 2001 and 2004 built on earlier modernization efforts but broke new ground; civil and criminal codes were revised to guarantee gender equality in marriage, divorce, and property division, criminalized marital rape, and toughen penalties for honor killings. Constitutional amendments obligated the state to ensure gender equality in practice, and the minimum marriage age was raised to 18. Despite these achievements, persistent social and structural barriers continued to undermine substantive change. Domestic violence, rape, and honor killings remained widespread, especially in the southeast. Policymakers demonstrated an "instinctive emphasis on the protection of the family institution first and foremost" in their approach to gender-based violence legislation. Women exposed to physical violence are typically offered "protection within the family rather than social, political or economic equality in society (Acar & Altunok, 2013). Shelters and social support systems remained scarce. Gender gaps persisted in labor force participation, education, and political representation, and many women, especially in rural regions, continued to face economic dependency, discrimination, and forced withdrawal from work. The rise of the AKP after 2002

brought renewed cultural conservatism, complicating further progress and revealing the limits of legal reform in the face of entrenched patriarchy.

5.2. Similarities and Differences in Policy and Legal Outcomes

Both Morocco and Türkiye experienced significant legal reforms related to women's rights from 1975 to 2004, but the foundations, processes, and sustainability of these reforms reflect deeper structural, legal, and political divergences.

1. Similarities:

- **Civil Society as a Driving Force:**

In both Morocco and Türkiye, the emergence and growing strength of women's organizations and civil society coalitions were decisive in pushing for legal reform. Morocco's UAF, ADFM, and other groups rallied broad-based support for change, exemplified by the million-signature petition for Mudawana reform. In Türkiye, women's "awareness-raising groups," independent feminist magazines, and public protests in the 1980s and 1990s played a similar role in breaking taboos and setting the stage for legal reform.

- **Global Engagement and Transnational Influence:**

Both states' reforms were deeply shaped by international conventions and global feminist discourse, particularly CEDAW. Women's organizations in both contexts strategically framed their advocacy in terms of international rights norms, while also navigating national sensitivity. International funding and partnerships (World Bank, USAID, European Union) supported domestic women's movements and enabled larger-scale campaigns.

- **Persistent Implementation Gap:**

Despite celebrated legal advances, both countries illustrate the limits of law when faced with entrenched social norms and institutional inertia. In Morocco, legal pluralism means that implementation is often undermined by judicial resistance, lack of training, and local traditionalism, especially in rural and illiterate communities. In Türkiye, secular laws often coexist with de facto customary practices, police reconciliation in abuse cases, and ongoing violence against women, all contributing to a continued gap between law and lived reality.

2. Differences:

- **Legal Pluralism vs. Secular Legal Foundation:**

Morocco's reforms unfolded within an explicitly plural legal system, grounded in Maliki Islamic jurisprudence, civil law and were legitimated by the King as both spiritual and political authority. All changes had to be framed as religiously legitimate, and reformers had to work within (and not against) the boundaries set by Islamic law (Sadiqi, 2008). By contrast, Türkiye's legal foundation is homogeneously secular, modeled on European civil codes (notably the Swiss code) (Arat, 2010). The Kemalist state explicitly rejected religious law in family matters; however, in practice, legal pluralism persists in the form of regional, customary, and even Shari'a-influenced practices, especially in rural areas.

- **State Engagement and Top-Down Reform:**

Morocco's process was unmistakably top-down, civil society had to appeal to the monarchy, and all significant legal change was ultimately royal in origin. This has led some scholars such Brumbery (2002) and Cavatorta (2009) to call Morocco a case of "liberalized autocracy," where rights and reforms are reinforced only to a limited degree. The term liberalized autocracy, coined by Daniel Brumberg (2002), refers to political systems that temper authoritarian rule with limited pluralism (p.3). These regimes are "liberal" in the sense that their leaders deliberately allow, and sometimes even encourage a degree of political openness in civil society, the press, and the electoral process. However, this liberalization is carefully managed to preserve the ruling elite's dominance rather than to promote genuine democratization. Türkiye's reforms initially came through state-driven modernization, but the movement evolved, especially after the 1980s, toward greater independence. However, with the rise of the AKP in the 2000s, there has been a resurgence of conservative gender discourse and selective rollback of previous commitments relative to gender equality (Arat, 2010).

- **Character of the Women's Movement:**

Moroccan activism has sometimes been critiqued as elite-driven and externally funded, leading to questions about broad-based legitimacy and the indigenous character of reform. Turkish feminism, while initially urban and middle-class, became more diversified over time, yet faced internal debates about Westernization, liberalism

vs. socialism, and the limits of cooperation with the state. Both movements have faced resistance for being “not representative” of all women.

5.3. Assessment and Further Implications

The comparative analysis of Morocco and Türkiye reveals that the impact of global and transnational feminist influences on women’s activism and legal reform is profound but far from linear, and that theoretical perspectives, particularly Transnational Feminism and Legal Pluralism, are essential for critically understanding these processes and outcomes. Transnational feminist theory recognizes that feminist struggles are not confined by national borders and that the circulation of ideas, strategies, and legal norms, often via international bodies, conventions, and activist networks, can radically reshape the terrain of local advocacy. In both Morocco and Türkiye, the UN Decade for Women, the ratification of CEDAW, the Beijing Platform for Action, collectively created new opportunities and leverage for national women’s movements. These frameworks enabled women’s organizations to marshal full or partial international pressure and legitimacy, share techniques and knowledge across borders, and frame their demands in the language of universal rights, which in turn strengthened their bargaining power with state actors. Yet, transnational feminist theory also cautions against simplistic assumptions of global flows as always empowering (Merry, 2006). Both cases reveal how international frameworks are constantly adapted, re-framed, and localized to align with national contexts and political realities. For example, in Morocco, activists strategically framed their demands within Islamic principles and national values, often citing the king’s dual religious and political legitimacy, to ensure broad societal acceptance and to deflect accusations of “Westernization.” Similarly, Turkish feminists leveraged the CEDAW norms and international frameworks, but their advocacy was shaped by the legacies of Kemalist secularism, growing AKP conservatism, and regional differences (Arat, 2010).

Feminist Legal Pluralism is essential for understanding why even the most ambitious reforms often struggle to achieve transformative change in women’s daily lives. In Morocco, legal pluralism is *de jure*, statutory reforms to the *Mudawana* operates within the boundaries of the Maliki school of Islamic jurisprudence, along with international legal framework with the king serving as the ultimate legal and religious arbiter. Reforms are thus framed and legitimated in Islamic terms, and their

content, however progressive on paper, is always the product of negotiation between state, religious, customary law and activist actors. This means that the scope and implementation of legal change is limited not only by the text of the law, but by the enduring authority of tradition, judicial discretion, and localized interpretations. Türkiye's legal system, in contrast, is formally secular, but *de facto* legal pluralism persists in society. Customary practices, regional power structures, and even selective invocations of Shari'a or patriarchal codes continue to shape the lived experience of women, especially in rural and conservative regions. The coexistence of progressive statutory law and regressive customary practice produces major implementation gaps, revealing that legal change, however rooted in international norms, is not self-executing. This gap between "law on the books" and "law in action" is not a failure of activism but an inherent challenge of any legal reform in pluralistic societies. Legal reform is not the endpoint but only the beginning of real transformation and true achievement is not in changing the law, but in changing attitudes, institutional behaviors, and lived realities that require ongoing activism, education, and coalition-building long after the passage of statutes. Ultimately, transnational feminism and feminist legal pluralism together illuminate the double-edged nature of global engagement. International frameworks and exchanges can catalyze and empower local activism, but their success depends on the creative, context-sensitive work of adaptation and negotiation. In both Morocco and Türkiye, women's movements demonstrated remarkable capacity to leverage international norms and alliances, but societal restraints and the persistence of patriarchal power, and the politics of localization and framing continually shaped, and at times, constrained outcomes. The unfinished work of implementing and deepening reform remains at the heart of the feminist project in both societies.

Building on that legal reform is only the beginning, Moroccan activists have highlighted the profound challenge of transforming social attitudes and everyday practices. As Leila, a leading figure from Jussūr, states (Salime, 2011) : "Changing the law is only the starting point" (p.184). We must act on mentalities, we must reform education, and we must work on reeducating the masses. This insight, explored by Zakia Salime (2011) in her analysis of Moroccan feminist activism, which reflects a growing awareness within the movement that legislative victories, even as substantial as the Mudawana reforms, are insufficient without corresponding shifts in public

consciousness and everyday gender relations. Leila, who personally rejects the label “feminist” but embraces feminist politics, underscores that both men and women participate in perpetuating gendered oppression through socialization (Salime, 2011). Jussūr hub operationalizes this vision by running a free literacy center for mothers in Rabat-Medina, offering not only basic education, but also a space where women learn about their rights and gain practical empowerment, often alongside religious education from other local organizations. This grassroots approach, focusing on “changer les mentalités,” (changing mentalities) underscores the ongoing struggle to bridge the gap between legal reform and lived experience. It recognizes that educating judges, sensitizing communities, and reimagining gender norms are as crucial to women’s rights as any statutory change.

This emphasis on cultural heritage grounded advocacy is echoed in Fatima Sadiqi’s work, which urges that effective women’s rights movements must move beyond binaries; elite, urban, or narrowly secular and religious approaches to connect with women from all walks of life. In her book *Feminist Discourse in Morocco* (2014), Sadiqi stresses the importance of incorporating the ethnic and cultural heritage that portrays women’s agency; as well as the lived realities of diverse women- rural, urban, and from various backgrounds into feminist discourse in Morocco. This approach allows advocacy to reach and resonate with broader segments of society, rather than remaining limited to the circles of large, educated, or nationally prominent organizations. While such organizations have been vital in achieving landmark legal reforms, Sadiqi states that true transformation depends on whether these rights are understood, accepted, and practiced across all communities, especially where social change has fallen behind. This strategy of adapting discourse and advocacy to local cultures and identities not only strengthens the legitimacy and acceptance of women’s rights reforms in Morocco but also offers valuable lessons for Türkiye as well. In both contexts, genuine progress requires that activism and legal reforms speak to the realities of all women, whether Kurdish, Berber, Arab, Turkish, or otherwise, and move beyond binary categories of “secular” or “religious”. Only by embracing this diversity can movements overcome resistance and ensure that the gains of legal reform become lived realities throughout society.

5.4. Limitations of the Research and Suggestions for Further Studies

This study has several important limitations that should be kept in mind when considering its findings. First, the analysis is limited to the period between 1975 and 2004 and for the reform implementation analysis up to 2010. While this period includes major moments of legal reform and activism, it does not cover more recent developments, such as Türkiye's EU candidacy process and its withdrawal from the Istanbul Convention or later reforms in Morocco. As a result, the study does not reflect the latest changes or ongoing trends in either country. Second, this thesis relies mainly on primary and secondary sources, such as official reports, academic articles, and books. There were no fieldwork or direct interviews with activists, policymakers, or affected women. Because of this, the research depends on how other scholars and organizations have presented the issues. Third, official data and reports about the implementation of reforms, violence rates, and social attitudes are sometimes incomplete, inconsistent, or not publicly available, especially for rural or remote regions. This means there are likely gaps in the evidence, and the real impact of reforms may be harder to judge. Fourth, while this thesis discusses only prominent organizations and movements, it focused only on the global engagement of two national-level and visible actors in Morocco, and major women's movements in Türkiye. It does not deeply explore the work of smaller, local, or minority groups, or the everyday experiences of ordinary women outside of the main movements. Fifth, the theoretical frameworks used here, legal pluralism in its new definition by Merry (1988) and transnational feminism, guide the analysis, but other possible perspectives, like intersectionality or postcolonial theory, are not explored. Finally, because social and legal change is complex, it is difficult to separate the influence of global engagement from national or local factors. Many different elements interact to produce change, and this study does not claim to prove direct causality. Future researchs could address these limitations by including more recent developments, especially after 2004, and by conducting original fieldwork or interviews to better capture the voices of grassroots activists, rural women, and minority groups. Studies that use both qualitative and quantitative data, or that compare a broader range of countries, could provide a deeper and more balanced understanding of women's activism and legal reform in different contexts. Exploring other theoretical approaches could also shed new light on the issues discussed in this thesis.

6. CONCLUSION

This thesis examines how global and transnational feminist engagements shaped women's activism and legal reform in Morocco and Türkiye between 1975 and 2004. Through the combined lenses of Transnational Feminism and Legal Pluralism, particularly Sally Engle Merry's 1988 redefinition of "legal pluralism", the study argued that global feminist norms do not simply arrive in national contexts. They circulate, shift, and are continually re-interpreted as they interact with political histories, legal structures, and deeply rooted social norms. The comparative analysis shows that the impact of global engagement is profound but far from linear; it is shaped as much by national trajectories and local power configurations as by the norms themselves. Transnational Feminism offers critical insight into how feminist struggles cross borders, how activist networks diffuse strategies, and how global legal frameworks, CEDAW, the UN Decade for Women, the Beijing Platform for Action, created new opportunities for women's movements. In both Morocco and Türkiye, these frameworks expanded political space, enhanced advocacy skills, and provided international legitimacy. Moroccan organizations drew heavily on CEDAW and the Beijing Platform to refine their legal arguments, secure foreign funding, and build alliances. Turkish feminists used these same frameworks to strengthen coalition-building, capacity development, and policy literacy that already started before the UN decade for women and built great momentum for policy advocacy. Yet transnational feminist theory also reminds us, as Merry (2006) argues, that international norms are never adopted wholesale. They are filtered through national histories, political regimes, and cultural boundaries. This process of localization and reframing was especially visible in Morocco. Activists did not present their demands as imported or foreign; instead, they grounded them in Islamic jurisprudence reinterpretation, national identity, and the king's dual religious-political legitimacy. This strategy deflected accusations of "Westernization" and enabled reform to resonate with the broader public. Turkish activists drew on international norms, but their advocacy was inseparable from the legacies of Kemalist secularism, emerging AKP conservatism, and distinct regional cultural divides. In Türkiye, CEDAW served as an important reference point in the advocacy, which led and generated along with the EU candidacy (which is beyond the scope of this study) the sustained pressure that enabled major

legal reforms between 2001 and 2004. Thus, global norms played a catalytic role in both countries, but the mechanism and degree of impact differed sharply.

New legal pluralism is indispensable for understanding why even the most ambitious reforms encounter resistance in practice. According to Merry, law is not a single authoritative system but a dynamic field where state law, customary norms, religious authority, and international frameworks interact. This theoretical lens reveals that legal reform does not replace existing norms; it enters negotiation with them. Morocco presents a clear case of *de jure* legal pluralism. The Mudawana, even after its 2004 overhaul, operates within Maliki jurisprudence, and the king remains the ultimate legal and religious arbiter, while other domains are ruled by the French civic law. Judicial discretion, tradition, and localized interpretation significantly shape how the law is applied. This explains why child marriage petitions continue to be approved and why polygamy, though restricted, remains legal. Legal reform does not automatically transform the social and interpretive norms that underpin judicial decision-making. Türkiye, in contrast, embodies *de facto* legal pluralism. The civil and penal codes are fully secular, yet customary practices, regional power structures, and patriarchal interpretations persist in shaping women's everyday lives, especially in conservative or rural areas. The coexistence of progressive statutory law and regressive customary relative to gender norms creates major implementation gaps, revealing that even legislation reforms are not automatically enforced in plural social environments. This gap between "law on the books" and "law in action" is not a failure of the movements but an inherent challenge of reforms. Real change requires shifting attitudes, institutional behaviors, and gender socialization, processes that extend far beyond the passage of statutes. CEDAW Committee reviews further underscore these dynamics. The 2008 Morocco evaluation praised the reforms of the Mudawana and Nationality Law but expressed deep concern about persistent judicial approval of child marriage, the continued legality of polygamy, and the uneven application of the law in rural regions. The 2010's Türkiye evaluation recognized major statutory achievements but highlighted discriminatory practices, the non-retroactive nature of marital property reforms disadvantaging women married before 2002, and the absence of a comprehensive anti-discrimination law. These evaluations confirm that international influence generates breakthroughs in legal text, but implementation remains mediated by local social forces.

The findings of this thesis show that legal reform is only the beginning. Moroccan activists have long emphasized the profound challenge of transforming social attitudes. Law can set new standards, but social norms reproduce through everyday practices, education, and gendered expectations. The literacy center operated by Jussūr in Rabat-Medina exemplifies how grassroots organizations attempt to bridge this gap, educating women about their rights, building confidence, and reshaping mentalities through long-term community work. Such initiatives illustrate that reform does not end with legislation; it expands into public consciousness, judicial culture, and generational attitudes. Fatima Sadiqi's scholarship reinforces this conclusion. She argues that feminist advocacy in Morocco must transcend binaries; urban, elite, or narrowly Secular-Islamic frameworks to resonate with a broader spectrum of women, rural women, Amazigh women, working-class women, and others whose lived experiences are often absent from national debates. This insight applies equally to Türkiye, where Kurdish women, rural women, and conservative communities navigate gender norms differently than urban secular activists. Effective reform requires movements that speak to the realities of all women. Only inclusive, culturally grounded advocacy can ensure that legal gains become lived realities.

This study has several limitations. First, its temporal scope ends in 2004 for reforms and 2010 for implementation, excluding important recent developments such as Türkiye's withdrawal from the Istanbul Convention or Morocco's ongoing debates on Mudawana reform. Second, the research relies on academic literature and official reports without fieldwork, limiting direct insight into grassroots perspectives. Third, official data on implementation and gender-based violence remain uneven, especially in rural areas, making real impact difficult to measure. Fourth, the analysis focuses on major national movements and does not examine smaller, local, or minority organizations in depth. Finally, while Transnational Feminism and Feminist Legal Pluralism offer strong analytical grounding, other theoretical approaches, intersectionality, postcolonial theory, could illuminate further dimensions of women's activism. Despite these limitations, this thesis contributes to the comparative study of women's rights by demonstrating how global norms interact with culturally embedded legal orders to shape activism, reform, and implementation. The study shows that progress depends not only on international engagement or legislative victories but also on the slow, complex work of transforming mentalities, institutions, and lived realities.

Morocco and Türkiye illustrate that legal reform opens the door, but only long-term societal change allows women to walk through it.



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