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Veiled Politics:
Legitimating the Burqa Ban in the French Press

By:
Anne Roberts

Under the Direction of Leonard Teel

Abstract

In October 2010 the Constitutional Council of France approved a law banning the burqa and niqab from all public places. Joining the ongoing scholarly discussion on veiling, this study seeks to understand the role the French press played in legitimating the ban, the first of its kind to be implemented in Europe. I argue that discourse in the press made the legislation appear reasonable and necessary because of its association with gender inequality and religious fundamentalism. This media narrative legitimated the legislation by presenting the veil as intolerable and "against public social order." Made necessary by rapidly shifting demographics in contemporary France, this discourse was couched in a defensive employment of *laïcité*.

INDEX WORDS: burqa, hijab, France, laïcité, burqa ban

Veiled Politics:

Legitimating the Burqa Ban in the French Press

by

Anne Roberts

A Thesis Submitted in Partial Fulfillment of the Requirements for the Degree of

Master of Arts

in the College of Arts and Sciences

Georgia State University

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Legitimating the Burqa Ban in the French Press

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Introduction

A Genealogy of the Bill

The law, which has come to be known as the "Burqa Bill," passed the French Senate on Tuesday, September 14, 2010 with an overwhelming majority of 246 to 1. The press did not publish the identity of the sole dissenter. Having passed the lower house in July, the Constitutional Council reviewed the bill and approved it on October 7, 2010. But, to understand the origins of this bill, let me first trace its history.

The law banning the burqa and the niqab from public places was first conceived following a speech that President Nicolas Sarkozy delivered to Parliament on June 22, 2009. In this speech, Sarkozy declared "The Burqa is not welcome in the territory of this Republic. It is not an idea that that the Republic believes brings dignity to women."[1] Though legislators ran into difficulties drafting a bill that they perceived to be legally sound, the French cabinet approved a draft of a law intended to ban the Muslim full-face veil from public spaces on Wednesday, May 19, 2010. Following this victory, Sarkozy told assembled ministers that "in this matter the government is taking a path it knows to be difficult, but a path it knows to be just."[2] In a document obtained by *Le Figaro* listing the reasons for the bill and in order to banish full veiling, the drafters of the document "evoke the dignity of the human person – even though some women would be willing – public order in its broad sense, that of living together, and finally, issues of security." [3]

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[1] *L a Burqa n'est pas la bienvenue sur le territoire de la République. Ce n'est pas l'idée que la République se fait de la dignité de la femme.* "Burqa : la France prend-elle un risque ? (The Burqa: Is France taking a risk?)- LeMonde.fr," n.d., http://www.lemonde.fr/a-la-une/article/2010/05/05/burqa-la-france-prend-elle-un-risque_1347074_3208.html.
[2] "French cabinet approves burqa ban law," *Agence France Presse*, May 19, 2010.
[3] cgabizon@lefigaro.fr, Cécilia Gabizon;"Loi sur la burqa; avis défavorable du Conseil d"État." (The law against the burqa: the unfavorable opinion of the Conseil d"État) Le Figaro, May 14, 2010, A edition, sec. LE FIGARO France.

On Tuesday, July 6, 2010, the parliament began a three-day period of debate. Members of the Socialist party announced that they would boycott the vote, protesting the ban on the full-face veil in *all* public places.[4] Following the debate period, the National Assembly voted on Tuesday, July 13, 2010 to approve the ban by a vote of 355 to one. As promised, members of the Socialist party abstained from voting.[5]

The law contains seven articles and bans full-face coverings in all public places. It makes exceptions for ski masks, helmets, carnival masks, masks worn for welding and construction work, and interestingly, Father Christmas costumes.[6] It defines public space very broadly, including government buildings, public transportation systems, and all streets, markets, thoroughfares, private businesses and entertainment venues. The law also allowed for a six-month grace period to educate women. Following the grace period, a fine of €150 will be imposed on those caught wearing the veil. Upon their first offense, women can choose to participate in a citizenship course instead of paying the €150 fine. Men who force their wives or daughters to cover themselves for religious or cultural reasons face harsher penalties, this constitutes the creation of a new crime, that of forced facial concealment. They can be fined up to €30,000 and face a one-year jail term. The fines will be doubled if the concealed person is a minor.[7] The law also applies to tourists.

While much scholarship concerns itself with the treatment of French-Muslim women within the context of the headscarf ban in public schools, the free expression of religion (even Islam) has remained protected in public places until recently. Therefore, no current scholarship

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[4] "French lawmakers debate Muslim veil ban," *Agence France Presse*, July 6, 2010.
[5] Ibid.
[6] "French lawmakers approve full veil ban," *Agence France Presse*, September 13, 2010.
[7] "N° 2262 - Rapport d'information de M. Éric Raoult fait au nom de la mission d'information sur la pratique du port du voile intégral sur le territoire national," n.d., http://www.assemblee-nationale.fr/13/rap-info/i2262.asp. (The informational report of Mr. Éric Raoult in the name of the inquiry of the practice of wearing the full veil in the territory of the state)

on the banning of the full veil exists. This paper, then, joins the ongoing scholarly discourse of veiling at a point of unique convergence. It argues that the women's rights frame offered by mainstream print media in France is itself a veil. Behind it one finds a familiar patriarchal discourse of the Muslim woman as victim, legitimating – nay, necessitating – a law to "save" her. This discourse is couched in a defensive employment of *laïcité*.

The Muslim Population in France

Muslims have been part of French society for more than a century. [8] They constitute a large and highly visible portion of the French population. In fact, France has the largest population of Muslims – an estimated 10% - of any European country, the majority of whom are of North African descent. Islam is now the second largest religion in the country. Islam is also the fastest growing religion in France[9] and this growth has been accompanied by ethnic tensions between Muslims and non-Muslims.[10]

The first influx of North Africans into France took place between 1915 and 1918.[11] During this time, France recruited approximately 150,000 laborers from its colonies in North Africa. The French government transported these workers to France and later granted them citizenship.[12] The majority of these laborers came from the French colonies of Morocco, Algeria and Tunisia. Typically, the government only recruited men for labor. However, many of the

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[8] Stephen M., Croucher, "French-Muslim Reactions to the Law Banning Religious Symbols in Schools: A Mixed Methods Analysis.." *Journal of International & Intercultural Communication* 2, no. 1 (February 2009): 1.
[9] Robert Levine. *Assimilating Immigrants: Why America and France cannot*. Santa Monica, CA: RAND Corporation, 2004.
[10] Croucher, "French-Muslim Reactions." p 3.
[11] Ibid.
[12] Joel Fetzer. *Public Attitudes Toward Immigration in the United States, France, and Germany*. Cambridge, UK: Cambridge University Press, 2000.

North African men who immigrated as laborers later called upon their families to join them in France.[13]

Significance

This law demonstrates a break from French legal precedence. Previous legislation has been limited to regulating the religious expression of minors in public schools, which are publicly owned and therefore public institutions. This is because minors in France are not deemed legally capable of making informed decisions about group membership and identification. Other legislation has targeted the religious expression of *adults*, but this has been limited to government employees working in publicly owned spaces. These employees, as government representatives, are not permitted to display membership to any group (other than the French Republic) that may affect the way other citizens interact with or perceive them. The current law, then, breaks from this legal precedence by limiting the religious expression of *adults* in *all* public places.

France is the first European country to ban the burqa and niqab from public places.[14] However, after the approval of the ban by the Constitutional Council, several European countries began drafting similar legislation, demonstrating France's influence on European domestic policy making. This paper explores the way this legislation was negotiated and, ultimately, legitimated in the French press.

To date, no scholarly works discussing the "Burqa Ban" have been published, rendering this project both current and groundbreaking. Drawing from more than 150 French news articles from daily publications throughout France, this project paints a detailed picture of the "burqa

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[13] Adrian Favell. *Philosophies of Integration: Immigration and the Idea of Citizenship in France and Britain*. New York: St. Martin's Press, Inc., 1998.

[14] Turkey passed a law banning the burqa in 1925 but has not yet been granted membership to the European Union. Additionally, Belgium passed a law banning the burqa and niqab from public places in 2010 but the law had not been implemented at the time this paper was written.

ban" in the French press. Joining the ongoing scholarly conversation on veiling in France, this study seeks to understand the role the French press played in legitimating the ban on the full veil and contributes to the understanding of the discourse surrounding the veil, a powerful symbol of Islam throughout the world.

Research Questions

1. How was the state-determined political agenda promoted or opposed in the French press to legitimize or delegitimize the Burqa Ban legislation?
2. What frames and arguments were used in the legitimation and delegitimation process?
3. Were state-determined frames of the issue (such as "women as victims") reflected in news coverage of the Burqa Ban legislation?
4. Were oppositional voices represented in the French press?

Data

To answer these questions, I examined coverage of the "Burqa Bill" in two Parisian dailies, *Le Monde* and *Le Figaro*; one French news agency, Agence France Presse (AFP); and four regional French dailies: *Ouest France*, *Sud Ouest*, *Midi Libre*, and *L'est Républicain*. It is crucial to include regional dailies in this study because they reflect the great importance attached to regional identity in France and are thus important tools used in the construction and maintenance of public opinion. Furthermore, the Parisian dailies are essential sources because they are the newspapers of choice for the well-educated and elite classes, these are the classes from which policy makers often hail. All publications in this study were selected for their historical importance as news sources, their high circulation, and their reputations as well-respected sources for news in France. Furthermore, these publications were all accessible online through Factiva.

Table 1

	May '10	**July '10**	**September '10**	**October '10**	**April '11**
Le Figaro	50 articles 15 included	29 articles 7 included	9 articles 4 included	13 articles 4 included	9 articles 3 included
AFP	32 articles 10 included	17 articles 6 included	17 articles 6 included	21 articles 5 included	7 articles 2 included
Ouest France	17 articles 6 included	9 articles 3 included	5 articles 2 included	9 articles 3 included	8 articles 3 included
Sud Ouest	24 articles 7 included	13 articles 4 included	7 articles 3 included	12 articles 4 included	8 articles 3 included
Midi Libre	35 articles 12 included	11 articles 4 included	7 articles 2 included	9 articles 3 included	14 articles 5 included
L'Est Républicain	4 articles 2 included	0 articles 0 included	1 article 1 included	1 article 1 included	9 articles 3 included
Le Monde	25 articles 8 included	11 articles 5 included	9 articles 4 included	8 articles 3 included	20 articles 8 included

To create a manageable yet comprehensive and representational data set, this study was comprised of a random sampling of all stories concerning the burqa, niqab, or the law banning them from each of the seven sources during the months of legislative action. Therefore, articles

were gathered for the months of May 2010, July 2010, and October 2010. Additionally, a random sampling was taken for all seven sources from the month of April 2011, the month that the law was implemented. Because news about the "Burqa Ban" was less timely and relevant during the months when no legislative action took place, and therefore less likely to appear in the press, those months were not included in this study.

To ensure the collection of a truly random sample, an online random sample generator was used. A random, proportional sample was taken from each source for each month selected for the study. To see a breakdown of the samples taken by month and publication see Table 1.

Framing Theory and News Media

Framing theory is omnipresent in the social sciences and humanities, however, it is particularly useful in media studies, where it can be helpful in understanding and describing the power of a communicating text. According to Entman, to frame is "to select some aspects of a perceived reality and make them more salient in a communicating text, in such a way as to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment or recommendation for the item described."[15] A frame then, diagnoses, evaluates, and prescribes. By establishing problems, frames also limit the possible solutions. He notes, "the problem is that facts do not speak for themselves. Choosing how to put facts together and which to emphasize inevitably affects what audiences perceive as reality…"[16]

Frames function to make a piece of information more noticeable, meaningful or memorable to audiences. Reese's work on framing and the "war on terror" demonstrates that once a dominant frame has been established, it is extremely difficult for a convincing counterframe to be advanced. The result, he notes, is that "political debate takes place largely

[15] Entman, Robert. "Framing: Toward Clarification of a Fractured Paradigm." Journal of Communication (n.d.): 51.
[16] Entman, Robert. Democracy Without Citizens: Media and he Decay of American Politics. New York: Oxford University Press, 1989. (p. 30)

within the boundaries set by the frame with general acceptance of the assumptions built into it."[17]

What is excluded from a frame is just as important as what is included. In their discussion of the connection between framing of AIDS policy and public perception, Sniderman, Brody and Tetlock found that "the effect of framing is to prime values differentially, establishing the salience of one or the other."[18] Therefore, what is not included in a dominant frame or stock of frames is not likely to enter into public consciousness. Unpublicized, alternative views will gain few supporters and are unlikely to have a significant effect on public opinion or perception.

Kosicki and Pan's influential work on framing analysis points out the role of three different players in the media framing process: journalists, sources and audience. This multifaceted approach to framing obviates the fact that frames emerge for different reasons, depending on the characteristics of the involved actors.[19] Therefore, as Entman has suggested, "the frame in a news text is really the imprint of power – it registers the identity of actors or interests that competed to dominate the text."[20]

Methodology

The discourse of each text was analyzed using a Discourse-Historical Approach (DHA), a research approach of Critical Discourse Analysis (CDA). CDA critically investigates social inequality as it is "expressed, constituted, legitimized and so on, by language use."[21] One of the aims of the DHA is to "'demystify' the hegemony of specific discourses by deciphering the

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[17] Reese, Stephen D. "The Framing Project: A Bridging Model for Media Research Revisited." Journal of Communication 57, no. 1 (March 1, 2007): 148-154.
[18] Sniderman, Paul M., Richard A. Brody, and Philip Tetlock. Reasoning and choice: explorations in political psychology. Cambridge University Press, 1993.
[19] Kosicki, Gerald, and Pan. "Framing analysis: An approach to news discourse." Political Communication 10, no. 1 (1993): 55-75.
[20] Entman, "Framing: Toward Clarification of a Fractured Paradigm."
[21] Wodak, Ruth, and Michael Meyer. "Critical Discourse Analysis: History, Agenda, Theory, and Meodology." In Methods of Critical Discourse Analysis, 1-33. Second Edition. London: SAGE Publications, 2009.

ideologies that establish, perpetuate or fight dominance."[22] The DHA also considers intertextual and interdiscursive relationships between texts, genres, and discourses, as well as social and sociological variables, the history of the problem in question and situational frames. Reisigl and Wodak describe the DHA approach to CDA as being three-dimensional: after "(1) having identified the specific contents or topics of a specific discourse, (2) discursive strategies are investigated. Then, (3) linguistic means and the specific, context-dependent linguistic realizations (as tokens) are examined."[23] Heuristically, scholars using the DHA orient themselves to questions of how persons, objects, events, processes and actions are referred to linguistically, what characteristics are attributed to certain actors, objects, events and processes, what arguments are employed in a given discourse, from what perspective these arguments are addressed and whether they are intensified or mitigated.

Though the Discourse Historical Approach focuses on many discursive strategies[24], this project is interested in strategies of argumentation and strategies of framing or discourse representation. Using the DHA, the discourse of each text was analyzed, with special attention given to dominant, intertextual frames. It is important to discover the latent meaning behind these frames and their participation in the legitimation of the "Burqa Bill." While exploring the strategies of argumentation used in the texts, I focus on the justification of positive and negative aspects of the Burqa Ban and how these arguments were used to legitimize or delegitimize the legislation.

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[22] Reisigl, Martin, and Ruth Wodak. "The Discourse-Historical Approach." In Methods of Critical Discourse Analysis, 87-120. Second Editon. London: SAGE Publications, 2009.
[23] Ibid.
[24] According to Reisigl and Wodak, the DHA focuses on discursive strategies such as referential strategy or strategy of nomination, strategies of predication, strategies of argumentation, strategies of perspectivization, framing or discourse representation and strategies of intensification and mitigation within the texts. Reisigl and Wodak, "The Discourse-Historical Approach."

Legitimating the Veil in the French Press

The Interior Minister of France has estimated that a mere 2,000 women in France wear the full Muslim veil. France's population, including its overseas territories is estimated to be 65,312,249[25] meaning that the "Burqa Ban" affects a mere .003% of the French population. What, then, has caused this seemingly disproportionate reaction? To understand this, one must first understand why Muslim veiling, a practice that has been controversial in France since 1989, is a particularly sensitive issue. In responding to this, an appreciation of the effective mobilization of public sympathy for the women who wear the veil, often depicted as victims who have been forced to wear these garments, and a knowledge of France's history associated with veiling is absolutely essential.

Chapter 1 of this study will discuss the portrayal of Muslim women in French press coverage of this ban. It shows that the French media narrative has characterized Muslim women as victims. This portrait is part of a familiar stock of frames associated with veiling in France. It is, as Ticktin notes, part of a neocolonial discourse of "saving" Muslim women.[26] Characterizing Muslim women in this way ensured public sympathy for these women, [27] making it appear necessary for a law to be implemented in order to rescue these women from their "mobile prisons." This narrative allowed journalists, politicians and activists to frame the "Burqa Ban" as a women's rights issue.

The historical context of this law is also of immense importance. For this reason, in Chapter 1 I also explore the history of veiling in France. This historical discussion unpacks the

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[25] "CIA - The World Factbook", n.d. https://www.cia.gov/library/publications/the-world-factbook/geos/fr.html.
[26] Ticktin, Miriam. "Sexual Violence as the Language of Border Control: Where French Feminist and Anti-immigrant Rhetoric Meet." Signs: Journal of Women in Culture & Society 33, no. 4 (Summer2008 2008): 863-889.
[27]"Europe Contre la burqa Vice-présidente du Parlement européen, c..." (Europe Against the burqa Vice-President of the European Parlaiment, c…) Midi Libre, May 3, 2010.

controversy that veiling has caused in France. Additionally, it draws from contemporary scholarly discourse on the 2004 law banning the hijab from French public schools to illuminate the trends that have emerged in French press coverage of veiling. This facilitates the understanding of how the "women's rights" frame emerged and why it was so effective in legitimating the "Burqa Ban".

France's political and religious heritage has played an important role in influencing the mediated discourse surrounding the veil. Throughout the 20th and 21st century the practice of Muslim veiling has been represented as incompatible with French "republican values". To understand why this practice is perceived to be fundamentally *un*French, despite the fact that it is worn many France-born Muslims, one must comprehend the uniquely French conception of republicanism and secularism. For this reason, Chapter 2 explores the development and manifestation of secularism, or *laïcité*, in France and its connection to French republicanism.

These values are fundamental to French society. Therefore, although the drafters of the ban did not explicitly list them among the government's reasons for the ban, they nevertheless created a powerful frame used to make the "Burqa Ban" appear legitimate and necessary. Chapter 2 discusses the way this frame was deployed in the French press. It also discusses a surprising, albeit infrequent counterframe that emerged in editorials.

Finally, this study concludes with a discussion of the implications of the frames used (and not used) in legitimating the "Burqa Ban" in the French press. It demonstrates the difficulty of generating new frames to describe a problem and the effectiveness of deploying commonly used frames.

Chapter 1

The Veil and Women's Rights

The burqa is not welcome in the territory of this Republic it is not an idea that the republic believes brings dignity to women.
- Nicolas Sarkozy, June 22, 2009

This chapter seeks to understand the role and representation of Muslim women in French press coverage of the "Burqa Bill." Understanding this representation is important because the daily lives of thousands of Muslim women are affected by the stipulations and regulations of this bill. Therefore, after a brief overview of the history of veiling and veiled women in France, this chapter explores the ways in which the frame of "women's rights" or the "dignity of women" was used in French press coverage of the bill.

A Brief History of Veiling

The practice of veiling pre-dates Islam. In fact, the veil is a product of Judaism. Women in ancient Judea were required by their religion to wear a veil over their heads when praying to Jehovah,[28] and in all depictions of the Virgin Mary, the mother of Jesus Christ, she wears a veil over her hair.[29] Female followers of Jesus Christ, believing him to be the son of Jehovah, continued to practice Judaic veiling. This led to the inclusion of veiling in Christianity.

Ancient Assyrian Kings made the veil fashionable by introducing it into the royal harem.[30] This seclusion soon became popular with women of "proper" social and economic class. To further emphasize this class distinction, the king forbade slaves and prostitutes from

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[28] Stephen Croucher, *Looking Beyond the Hijab*. Cresskill, NJ: Hampton Press, p 41.
[29] Ibid.
[30] Stephen M. Croucher, "French-Muslims and the Hijab: An Analysis of Identity and the Islamic Veil in France.." *Journal of Intercultural Communication Research* 37, no. 3 (November 2008): 199-213.

veiling themselves. In fact, if a woman veiled herself illegally she could be flogged or even have her ears cut off,[31] a punishment that guaranteed deep shame for the rest of her life.

Despite its origins in Judaism and early incorporation into Christianity, today it is the Muslim faith in which the tradition of veiling is most common. Though in contemporary society it is considered a defining symbol of Islam, the veil did not appear as a symbol of Islam in the Muslim community until approximately 627 C.E. There are many arguments for and against veiling in Islam and supporters and opponents a like claim the Koran supports their argument. The most frequently quoted Koranic verse on the subject of veiling is Surah 24:31, which states,

> And tell the believing women to lower their gaze and be modest, and to display of their adornment only that which is apparent, and to draw their veils over their bosoms, and not to reveal their adornment save to their own husbands or fathers or husbands' fathers, or their sons or their husbands' sons, or their brothers or their brothers' sons or their sisters' sons, or their women, or their slaves, or male attendants who lack vigor, or children who know naught of women's nakedness."Surat An-Nur [24:31] - The Holy Qur'an - ÇáÞÑÂä ÇáßÑíã."

The emphasis of this verse is on the modesty of the female body. However, this verse is regularly cited as support for the hijab, burqa and niqab. The burqa is a loose-fitting fitting veil that falls to the ankles, shielding the entire body of a woman, with an opening for the eyes through which women are able to see. The niqab is a loose-fitting veil that falls to the shoulders, covering the face, neck and hair of a woman but allowing her to see through an opening for the eyes.

The reasons why Muslim women – particularly converts to Islam – choose to veil themselves are diverse. To understand these reasons, Zuhr conducted surveys among women in Egypt, Kuwait, Oman, Jordan and the United States. She found nine categories that illuminate reasons why women choose or are sometimes forced to hijab: religious, psychological, political,

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[31] Driver, Godfrey Rolles, and John C. Miles. The Assyrian laws. Scientia Verlag, 1975.

revolutionary, economic, cultural, demographic, practical, and domestic.[32] Elaborating on these nine functions, Croucher argued that Muslim women have taken to wearing hijabs as a form of silent social protest; to blend their French, Muslim and North-African identities; to help them feel comfortable or secure in their bodies while out in public; and to aid in feeling a closeness to the Prophet Muhammad and to the Muslim community.[33] He found that French-Muslims believe the Islamic veil or hijab to be a fundamental part of their identity. In his interviews Muslims describe the hijab as being an important symbol of Islam that runs counter to France's concept of secularism, or *laïcité*. They also asserted that regulations like *la Loi* 2004-228 (the law banning "ostentatious" religious symbols in public schools) represent an attempt by France to control Muslim identity and forcefully integrate the population.[34]

Many Muslim women, however, claim that veiling empowers them in a number of ways. They feel that this practice gives them distinct identities, allows them to take control of their bodies and gives them a sense of belonging to the larger Muslim world.[35] Indeed, a study released by the Open Society Institute many women expressed that they chose to veil themselves because they were "seeking a monastic life."[36] Other women wear the veil because it desexualizes their bodies and "is a device for earning respect and ensuring her safety from potential male viewers."[37] Most importantly, these women assert that "the issue is not that they *have* to dress traditionally, but that they *choose* to embrace the (veil) as a marker of their Muslim identities.[38]

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[32] Sherifa Zuhr. *Revealing reveiling*. Albany: The University of New York Press, 1992.
[33] Croucher, "French-Muslims and the Hijab: An Analysis of Identity and the Islamic Veil in France"
[34] Ibid.
[35] Ruby, Tabassum F. "Listening to the voices of hijab." Women's Studies International Forum 29, no. 1 (January): 54-66.
[36] Le Bars, "En voile intégral et désormais 'hors la loi', des femmes témoignent." (Fully veiling and therefore 'outside the law', women testify) Le Monde, April 12, 2011, sec. Politique
[37] Ruby, "Listening to the voices of hijab."
[38] Ibid.

France Unveiled

The veil has been a controversial symbol in France for more than 20 years. The first veil affair occurred in 1989 in Creil (a suburb of Paris) when the headmaster of a public school expelled three female students schoolgirls for refusing to remove their hijabs, veils that cover the neck and hair, but not the face. The girls protested their expulsion by claiming they had a right to wear hijabs in observance of their religion. The headmaster of the school, however, argued that the wearing of religious articles violated the French concept of *laïcité*.[39][40] The girls' parents appealed to the federal government and the *Council d'état* ruled that the girls had a right to wear religious attire[41]. This decision ultimately reinforced *laïcité* and asserted the state as a governing entity that would not control religion.

The veil controversy reemerged with the passage of *la Loi 2004-228*, the 2004 law that forbade students from wearing "ostentatious" religious symbols such as hijabs, yarmulkes, and large crucifixes in public schools. The law states: "Dans les écoles, les colleges et les lycées publics, le port de signes ou tenues par lesquels les èléves manifestent ostensiblement une appartenance religieuse est interdit."[42] The French government argued that the passage of this law protected *laïcité,* the same value that upheld the wearing of veils in schools in 1989. Although the law banned *all* overtly religious symbols, Croucher found that many Muslims in

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[39] *Laïcité* or secularism is the French concept of separation of church and government. In its most simplistic form this concept prohibits the state from placing religious symbols in the public sphere. *Laïcité* is tied to the belief that a "uniform, secularized identity is the best guarantor of national identity – an identity that is increasingly seen as threatened by the growing Muslim population in France, as well as the European Union."Ticktin, "Sexual Violence as the Language of Border Control."

[40] Francoise Gaspard and Fahrad Khosrokhavar. *Le Foulard et le République*. (The Scarf and the Republic) Paris: Saint-Amand, 1995.

[41] Ibid.

[42] *In public school, colleges and universities, the wearing of signs or behaviors by which pupils express openly religious membership is prohibited.* "Law 2004-228," *LegiFrance*, n.d., http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000417977&fastPos=2&fastReqId=330345806&categorieLien=id&oldAction=rechTexte.

France viewed the law as a *carte blanche* way of banning Islam from public schools through "equal legal restrictions."[43]

Veiling in the French Press

The frame of "women's rights" or the victimization of women was one of the frames most frequently used in legitimating the ban in the French press. For the most part, the opinions quoted in the French press came from individuals whose lives would not be directly affected by the "Burqa Ban." White men of European descent constituted the largest group of individuals quoted, though the press also quoted white European women, and a few Muslim men. Muslim women were in the minority of those quoted and women who practiced full veiling were all but absent from press coverage of the ban. It is significant that the demographic most intimately affected by this issue was the demographic least represented in press coverage. In fact, an explanation and exploration into *why* women veil themselves was absent from the majority of articles.

This press coverage described women who wore the burqa or niqab as victims, outsiders, and linked them to terrorism and religious fundamentalism. This language is part of the hegemonic discourse often used to perpetuate Western stereotypes of Muslim women. By presenting the women affected by the Burqa Ban as victims, legislators and French citizens alike were able to "save" the helpless Muslim woman from oppressive religion, subversive social practices, savage Muslim men, and even from herself. Furthermore, this neocolonial rhetoric reinforced the familiar binary distinction in which the discussions surrounding veiling in France are often couched. These descriptions, found in nearly every article that discussed the ban,

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[43] Croucher "French-Muslim Reactions to the Law Banning Religious Symbols in Schools: A Mixed Methods Analysis."

framed the "Burqa Ban" as a women's rights issue and mobilized public sympathy towards these women.

Women as Victims

The French press regularly deployed the "women's rights" frame by depicting Muslim women, particularly those who wore the burqa or niqab, as victims. In these articles, politicians, commentators and activists described the women as being victims of an oppressive or misinterpreted religion[44], a patriarchal society[45], savage Muslim men[46], and even victims of themselves.[47]

The French press often portrayed Muslim women as victims of Islam itself. This characterization served a dual purpose, it reinforced the fundamental French value of *laïcité*[48] by constructing a narrative in which Islam is dangerous and subversive, and it made Muslim women

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[44] See: "Egypt Al-Azhar scholar supports French niqab ban", "Chronique; Voile integral et consensus républicain" (Chronology: the full veil and republican consensus), "Les musulmans s'interrogent sur l'application de la loi interdisant le port du voile integral dans l'espace public" (Muslims question the application of the full veil in public space), " Le voile integral est réglementé dans certains pays musulmans" (The full veil is regulated in certain Muslim countries), "Parti socialiste: oublier le 21 avril " (Socialist Party: forget the 21 of April) "Jean-Michel Boucheron vote le projet sur le voile integral" (Jean-Michel Boucheron votes for the ban on the full veil)

[45] See "French lawmakers approve full veil ban", "Indian teacher barred from work for refusing burqa: report", "Le Belgique interdit le voile integral" (Belgium outlaws the full veil), "Burqa: le PS propose sa loi et devrait voter la resolution UMP" (Burqa: the PS proposes a law and should vote on the UMP resolution), "Le voile integral contraire au 'contrat social républicain'" (The full veil is contrary to the republican social contract), "Loi anti-burqa contestée depuis des mois, la loi va être discutée aujourd'hui par les eéputés et mélanger religion, laïcité et droit des femmes; Une loi contre quoi et qui" (The anti-burqa law has been contested for months, the law will be discussed today by representatives of mixed religions, secularism and the rights of women; a law against who and what), "Le NDP s'invite à une conference sur l'islam" (The NDP is invited to a conference on Islam)

[46] See "Burqa: le PS propose sa loi et devrait voter la resolution UMP" (Burqa: the PS proposes a law and should vote on the UMP resolution), "Chronique; Voile integral et consensus républicain" (Chronology: The full veil and republican consesnsus), "Burqa: le trouble passé de Lies Hebbadj" (Burqa: the past troubles of Lies Hebbadj), "Discriminatoire vis-à-vis des femmes" (Discriminatory with respect to women)

[47] See "Chronique; Voile integral et consensus républicain" (Chronology: The full veil and republican consesnsus), "L'interdiction de la burqa est inutile" (Outlawing the full veil is useless), "Lest musulmans s'interrogent sur l'application de la loi interdisant le port du voile integral dans l'espace public" (Muslims question the application of the law banning the wearing of the full veil in public places), "Le voile integral contraire au 'contrat social républicain'" (The full veil is contrary to the republican social contract), "Le Conseil constitutionnel valide la loi sur le voile islamique integral" (The Constitutional Council validates the law against the full Islamic veil),

[48] *Laïcité*, or secularism is the French concept of separation of church and government. In its most simplistic form this concept prohibits the state from placing religious symbols in the public sphere. *Laïcité* is tied to the belief that a "uniform, secularized identity is the best guarantor of national identity – an identity that is increasingly seen as threatened by the growing Muslim population in France, as well as the European Union."Ticktin, "Sexual Violence as the Language of Border Control."

appear susceptible to manipulation and influence from religious leaders who intentionally misinterpreted the Koran in order to create "a society where women disappear from the public space and are no more than ghosts."[49]

Quotations from prominent Islamic scholars and clerics, such as Mohammed Moussaoui, President of the French Council of Muslim Faith and Abdel Muti al-Bayyumi, a cleric at Egypt's prestigious Al-Azhar Mosque further legitimized this characterization. Moussaoui, an outspoken supporter of the Burqa Ban, believed the burqa to be contrary to the Muslim faith. Likewise, Bayyumi, who has authored a book against the practice of veiling, proclaimed that he supported the ban because he believed "the niqab harmed Islam's image"[50] and that "many of [his] brothers in the Islamic Research Academy support [the ban]."[51] Presenting educated, socially and politically prominent Muslim men in favor of the ban made the law appeared reasonable and necessary. It also made clerics and practitioners of Islam who opposed the bill appeared to be radical fundamentalists.

Additionally, many news articles asserted that the burqa and niqab are not products of Islam, insisting that these garments had been appropriated by the religion for subversive purposes. *Midi Libre* described the burqa as "a Pashtun trick to get women to submit," and the niqab as a garment that was *created* in 1932 (and therefore not a product of religion at all).[52] In this way, the press portrayed Muslim women as being victimized by a religion that has been intentionally misconstrued with the intention of reducing them to little more than "black

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[49] "Parti socialiste: oblier le 21 avril."(Socialist Party: Forget April 21) Midi Libre. October 10, 2010.
[50] "Egypt Al-Azhar scholar supports French niqab ban."
[51] Ibid.
[52] Mokhtari, "Le NDP s'invite á une conférence sur l'islam." (The NDP is invited to a conference on Islam)

ghosts"[53] Likewise, *Sud Ouest* discounted the practice of full veiling, insisting that the veil is not religious phenomenon but

> a sectarian phenomenon which emanates from the highest level of wahhabi preachers from Saudi Arabia. They withdraw the young people and the young girls of society by causing them to live in a bubble cut off from the world.[54]

Associating the veil with Saudi Arabia's fundamentalist clerics made the veil appear to be no more than a tool used to oppress women. In *Ouest France*, Jean-Michel Boucheron, a member of the French National Assembly asserted that "the veil is absolutely not the expression of a religion but that of the patriarchy of another age."[55] Here, Boucheron characterized women as being withdrawn and cut off from society under the guise of religion. The press indicated that veiled women do not understand that that their religion is being intentionally misinterpreted to these ends. For this reason, legislation was necessary to "rid the women from this ignominy."[56]

Finally, and perhaps most significantly, Mohammed Moussaoui insisted in *Le Figaro* that women who veil themselves did so because of a "mistaken interpretation" and that "the women who bear the veil say they do this to imitate the wives of the Prophet, however, [his wives] were not veiled."[57] In this passage, women themselves misinterpret their religion. This is the one instance in which discourse in the press explored women's personal reasons for veiling. However, the elaboration was made by a *man* who invalidated this reason with little explanation.

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[53] Rouquette-Valeins, Hélène. "La loi chez les Sages." (The law with the Wise) Sud Ouest, July 8, 2010.
[54] Rouquette-Valeins, "Loi Anti-Burqa Contestée depuis des mois, la loi va être discutée aujourd'hui par les députés et mélanger religion, läcité et droit des femmes; une loi contre quoi et qui." (The Anti-Burqa Law has been contested for months, the law will be discussed today by representatives of mixed religions, secularism and the rights of women; a law against who and what)
[55] "Jean-Michel Boucheron vote le projet sur le voile intégral." (Jean-Michel Boucheron votes for the ban on full veiling) Ouest France, May 20, 2010.
[56] Ibid.
[57] de Mallevoüe, Delphine. "Le voile intégral est réglementé dans certains pays musulmans." (The full veil is regulated in certain Muslim countries) Le Figaro, May 20, 2010, sec. Le Figaro France.

In addition to being victimized by their religion, the press in France described Muslim women as being victimized by a patriarchal society bent on female submission. This is achieved through the emphasis the press placed on the claim that the veil is contrary to "republican values" and that it constitutes an abuse of human rights.

The most notable instance of this manifestation of the "women's rights" frame appeared in a July 29 article published by AFP. The article introduced readers to a teacher at a Muslim university in eastern India who had been prevented from teaching because she refused to wear the full veil mandated by the "fundamentalist" student association. The female teacher lamented that "most of the teachers do not like the dictate of the students to wear the burqa, but they have no option but to accept it."[58] She warned that this act constituted "the Talibanisation of educational premises and [that] there is no one to come to [the women's] rescue."[59]

This article functioned as a warning to French readers. It cautioned that without a law banning the burqa, France, too, could someday be at the mercy of patriarchal Islamists. By banning the veil, France would effectively denounce "all obscurantism, fundamentalism and practices detrimental to human rights or dignity of women"[60] and recognize that "radical practices detrimental to the dignity and equality between men and women, including wearing a full veil are contrary to republican values."[61] This article gave readers a glance into France's possible future and presented them with a choice, to ban or not to ban the full veil.

Another portrayal of women as victims in the French press can be found in the depiction of Muslim men as savages. To do this, articles emphasized practices such as polygamy, violence

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[58] "Indian teacher barred from work for refusing burqa: report." Agence France Presse, July 29, 2010.
[59] Ibid.
[60] Courtois, Gérard. "France; La France partagée entre déprime et crise de nerfs." (France: France is divided between depression and a crisis of nerves) Le Monde, May 4, 2010, sec. Editorial-Anaylses.
[61] "Burqa: le PS propose sa loi et devrait voter la résolution UMP." (Burqa: The PS proposes a law and should vote on the UMP Resolution) Le Monde, May 12, 2010, sec. Politique.

against women, and the treatment of women as possessions. It is important to note that all of the authors of these articles were of European descent. This created a distinction between the civilized white man and the exotic, savage Muslim man. Through the publication of articles revealing the cruel nature of the Muslim man, the press constructed a narrative that elevated the white, secular, European man to the role of "white knight", with the Muslim woman as his "damsel in distress" and the dark Muslim man as the sinister villain.

Three articles in this data set reported the polygamous behavior of Muslim men.[62] In two of the three instances the men had married a European woman in order to gain citizenship; with the intention of divorcing her once he secured it. In another instance, the wife of a polygamous Muslim man accused her husband of domestic violence. She claimed that while she was pregnant her husband had "beaten her in the belly with his fists with the intention of aborting the baby."[63] These articles perpetuated the "women as victims" narrative by silently urging readers to save the women from these adulterous, violent men. The press offered the burqa ban as a way to save these victims of the brutal Muslim man.

In addition to polygamy and violence, the press depicted Muslim men as treating women like objects. A May 22 *Le Monde* article describes these men as forcing their wives to veil themselves for the sake of a competition with other Muslim men, in this way

> many [Muslim women] undergo the escalation of husbands whose taste for [the full veil] is neither religious nor very spiritual. Men like to show off the bigger car to impress their friends. Those contests are covered women: it is the one with the largest …thickness of fabric.[64]

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[62] See: Courtois, "France; La France partagée entre déprime et crise de nerfs." (France: France is divided between depression and a crisis of nerves), Gabizon, "Burqa: le trouble passé de Lies Hebbadj." (Burqa: the past troubles of Lies Hebbadj), and Fleury, "Musulmans et non muslmans doivent se parler." (Muslims and non-Muslims should talk)

[63] Gabizon, Cécilia. "Burqa: le trouble passé de Lies Hebbadj." (Buqa: the past trouble of Lies Hebbadj) Le Figaro, May 4, 2010, sec. Le Figaro France.

[64] "Chronique; Voile intégral et consensus républicain." (Chronology: The full veil and republican consensus)Le Monde, May 22, 2010, sec. Portrait.

The article goes on to equate full veiling to "contemporary slavery."[65] This discourse reduced Muslim women to slaves and depicted Muslim men as their masters, possessors and captors. Therefore, the burqa ban is effectively legitimated by necessitating the liberation of these enslaved women. If the veil is equal to slavery, then a life unveiled is a life of freedom and freedom is a value that no member of a democratic society can reasonably object to.

The final and perhaps most sinister way in which press coverage portrayed women as victims and perpetuated the "women's rights" frame was by characterizing these women as victims of their own choices and behaviors. By emphasizing their willingness to submit and their lack of cultural understanding the press presented these women as having allowed themselves to become victims. The emphasis on the "pedagogical" or "meditation" period of six months that the bill required before coming into effect implied that women must be educated on the bill and, unlike other French citizens, could not understand the implications of the bill for themselves. Furthermore, the option of a "citizenship" course in lieu of a fine for wearing the burqa assumed that these women could not grasp what it means to be a French citizen but rather, must be taught. Here again, Mohammed Moussaoui legitimated the bill and its implications by publicly asking "the regional councils of the Muslim faith to gather the imams to define an action plan in order to reduce this practice [of veiling]," he insisted, "we must tell these women that they should not rely on imported fatwas or advice on the internet."[66]

In addition to victimizing themselves through a lack of understanding and education, the press depicted Muslim women as self-victims by *choosing* to wear the veil. In fact, discourse in the press often asserted that "women concealing their faces, voluntarily or not, are placed in a situation of exclusion and inferiority manifestly incompatible with the constitutional principles

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[65] Ibid.
[66] Le Bars, "Les musulmans s'interrogent sur l'application de la loi interdisant le port du voile intégral dans l'espace public." (Muslims question the application of the law banning the wearing of the full veil in public)

of freedom and equality."[67] In this way, women victimized themselves by choosing to submit to a practice that stripped them of their freedom and equality. Discussing the willingness of Muslim women to submit to the full veil in *Le Monde*, journalist Caroline Fourest argued that:

> "The fact that women wear [the full veil] by being willing, or say to be, does not detract from its violence. Quite the contrary. To accept and even defend the right to humiliation illustrates the destructive capacity of such a proselyte mentality."[68]

Here, all the reasons that Muslim women *choose* to veil themselves are delegitimized and reduced to violence and humiliation. The author did not entertain more noble (and rational) reasons for veiling such as a desire for modesty, closeness with the Prophet, or even reasons revolutionary in nature such as veiling one's self as a symbol of protest. Instead, Fourest discussed the subversive ways in which veiling could be used, perpetuating the narrative of women as victims and necessitating measures to "save" her, if only from herself. In this way, women were not only victimized by men who force them to degrade themselves by wearing the veil, they are victimized by themselves because they do not understand that the burqa is degrading. This depiction of the Muslim woman is one that compelled readers to feel that she must be "saved" in this case, by a bill banning burqas. It is a moral and political argument which elevated legislators to the position of savior for their chivalrous attempt at rescuing the Muslim woman from her male oppressors and her own ignorance.

Women as Outsiders

The actors in the press often used the frame of "women's rights" to portray Muslim women as outsiders. Indeed, the very existence of this frame implied that these women are exist on the margins of society and need to participate (and be *allowed* to participate) more fully in

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[67] Perrault, Guillaume. "Le Conseil constitutionnel valide la loi sur le voile islamique intégral." (The Constitutional Council approves the law against the full Islamic veil) Le Figaro, October 8, 2010, sec. Le Figaro France.
[68] "Chronique; Voile intégral et consensus républicain." (Chronology: The full veil and republican consensus)

French culture. However, many Muslim men and women felt as though the ban intentionally *excluded* from society, prevented them from expressing their religion in public places and from fully enjoying their right to religious expression afforded to them as members and citizens of the European Union.

Supporters of the ban described veiled women as being "locked up"[69], in a "mobile prison"[70], "cut off"[71] from society and trapped in "contemporary slavery."[72] In fact, verbiage in the bill itself expressed a desire to "prohibit behaviors that would indirectly counter essential rules of the republican social contract"[73] upon which French society is built and that

> these are the same principles of our social pact that prohibit anyone from being locked up within themselves, cut off from others while living in the midst of them. Their violation denies equality between men and women and causes women to relinquish a portion of their dignity.[74]

This discourse communicated that "fully veiled women are not like other citizens."[75] In representing these women as outsiders, the law against full veiling appeared necessary in order to create a more cohesive society and reinforced another commonly wielded frame, the importance of "living together." This maneuver gave the frame of "women's rights" a dual purpose: it extended an opportunity to "save" Muslim women from marginalization and to protect French values in an increasingly homogenous world.

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[69] See: "France expects criticism over burqa ban.", "La Belgique interdit le voile intégral." (Belgium oulaws the full veil)
[70] See: Ibid., "Europe Contre la burqa Vice-présidente du Parlement européen, c..." (Europe against the burqa Vice President of the European Parlaiment c…)
[71] See:"French lawmakers approve full veil ban.", Gabizon, "Le voile intégral contraire au 'contrat social républicain'." (The full veil is contrary to the republican social contract)
[72] "Chronique; Voile intégral et consensus républicain." (Chronology: The full veil and republican consensus)
[73] Gabizon, "Le voile intégral contraire au 'contrat social républicain'." (The full veil is contrary to the republican social contract)
[74] Ibid.
[75] "Chronique; Voile intégral et consensus républicain." (Chronology: The full veil and republican consensus)

Opponents of the bill expressed fear that the "Burqa Ban" would "further exclude women from society."[76] Here one found opposition from Muslim men and women. Some worried that "the proposal to prohibit the presence of women wearing the burqa or niqab in public institutions such as hospitals or government facilities [could] only result in discouraging women from going there."[77] Others worried that the law would result in their wives choosing to "remain cloistered at home"[78] and thereby isolating themselves because they felt unwelcome in public.

Furthermore, Muslim women themselves asserted that the law barred them from the public sphere. They believed that it resulted in their exclusion from public places and rejected their membership in European society. This is one of the few instances in which the press reported the opposition of Muslim women who practiced full veiling.

Some Muslim women ensured that they would "limit their outings to the 'bare minimum'" while others expressed plans to "wear a surgical mask, or settle in a Muslim country."[79] Other women refused to remove their veils after the law went into effect, they did this in protest because they felt that the law infringed upon their European rights[80] and therefore prevented them from fully participating in society. These sentiments could be conceived as "retaliatory exclusion", or, exclusion for the purpose of protest.

In the French press, supporters and opponents alike used the veil to signify the exclusion of Muslim women from mainstream society. For supporters of the "Burqa Ban", the full veil served as a symbol of slavery and oppression, a fate from which these women needed to be liberated. For opponents, the bill itself represented the exclusion of these women. Many Muslim

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[76] Hammarberg, Thomas. "L'interdiction de la burqa est inutile." (The burqa ban is useless) Le Monde, May 28, 2010, sec. Culture.
[77] Ibid.
[78] "French woman defies burqa ban as law comes into force." Agence France Presse, April 11, 2011.
[79] Le Bars, Stéphanie "En voile intégral et désormais 'hors la loi', des femmes témoignent." (Fully veiled and therefore outside the law) Le Monde, April 12, 2011, sec. Politique
[80] "French woman defies burqa ban as law comes into force."

men and women felt that outlawing the burqa and niqab in public places would force women to remain at home or prevent them from fully enjoying their rights as European citizens. Despite the varying means of exclusion, one thing is certain: the veil served as a powerful and highly visual marker of "otherness."

Conclusion

This chapter found that the French press used the frame of "women's rights" to legitimate the "Burqa Bill" by weaving a narrative that compelled readers to feel that she must be "saved" in this case, by a bill banning burqas. This moral and political argument elevated the legislators to the role of saviors and reinforced a familiar neocolonial binary distinction between "Self " and "Other", "East" and "West", secular France and fundamentalist Islam.

Furthermore, by painting Muslim women as outsiders, the press invoked the principles of *laïcité* and the idea of living peacefully together (to be discussed at greater length in later chapters), concepts which no French citizen could object to. Emphasizing the claim that these women lived beyond the bounds of traditional French society made the bill appear necessary in order to protect French culture, which is perceived to be declining as immigrant and Muslim populations in France continue to grow. In this way, the press offered the "Burqa Bill" as a solution to the problems created by the victimization of women. The discourse portrayed the bill a way to rescue the beloved yet wavering French culture while drawing Muslim women into the fold of mainstream society.

Finally, this chapter found that the French press underrepresented views and voices of Muslim women in their coverage of the bill. Although this ban is one that intimately affected Muslim women, coverage of the bill largely excluded the opinions and concerns of these women. Furthermore, no articles discussed the reasons for which they veil themselves. Rather, the press

substituted western, hegemonic reasons for veiling for more personal, religious, and sometimes revolutionary reasons. The marked absence of the views of Muslim women in press coverage confirms the argument that they are victims and outsiders.

Chapter 2

The Veil and French Republicanism

This is an important decision for the values of the Republic
- François Fillon, October 8, 2010

As one scholar has noted, France's reaction to Muslim veiling has been greatly shaped by "France's republican tradition of thinking about citizenship, the relation of citizenship to membership in social and religious groups, and most importantly secularism or *laïcité*."[81] Indeed, the frame of 'republican values' was one of the most frequently used frames in news coverage of the "Burqa Ban". In using this frame, politicians and journalists alike suggested that French Republican values are in danger, need protecting, and are purposefully rejected by the French Muslim population. This strong political and philosophical argument resonated most clearly with the political elite, but also with the general population. Republican values, in the French context, are closely linked with the concept of *laïcité*, or secularism, and have roots in the French Revolution and Jacobinism.[82]

Explaining the effectiveness of this frame in legitimating the legislation requires attention to the historical intricacies of French political thinking and the specific French context. This chapter contains a brief history of French republican values, with special attention paid to *laïcité*. It illustrates how these concepts are fundamental pillars of the French political ethos and demonstrates the unique problem that the French Muslim population poses for these concepts. This chapter then discusses how the burqa has been framed as a threat to 'republican values'.

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[81] Thomas, Elaine R. "Keeping Identity at a distance: Explaining France's new legal restrictions on the Islamic headscarf." Ethnic and Racial Studies 29, no. 2 (March 2006): 237-259.
[82] Carle, Robert. "HIJAB AND THE LIMITS OF FRENCH SECULAR REPUBLICANISM." Society 41, no. 6 (September 2004): 63.

This frame was necessary for two reasons. First, in order to impose a restriction on the expression of religion the state had to demonstrate that the expression posed a legitimate threat to public life, and second, the implications implicit in this frame guaranteed popular public and political support of the ban. Finally, this chapter concludes with a discussion of the implications of the use of this frame in legitimating the "Burqa Ban."

Secularism, Citizenship, and French Republicanism

To understand the use of this frame in press coverage of the "Burqa Ban", an appreciation of French conception of citizenship and secularism and the historical traditions associated with these concepts is absolutely essential. The values inherent in contemporary French republicanism have their roots in the French Revolution. This revolution, beginning in 1789, aimed not only to overthrow of the monarchy, but all forms of hierarchical undemocratic power, including the Catholic Church.[83] Before this time, the French monarchy had ruled by divine right with the belief that God had granted the king sovereignty. The Catholic church officiated over the ordination of each king and for this reason, Catholicism and the monarchy were deeply intertwined in a system through which their power was mutually validated.

The Roman Catholic Church and the French monarchy were so inseparable that when Revolutionaries eliminated the monarchy and began to conceptualize a democratic form of government, they sought to establish a secular state, one as free from religious oppression as it was from monarchial oppression. Indeed, the secular state is one of the most valued legacies of the Revolution.[84] For more than a century, however, the separation of church and state remained

[83] Wiles, Ellen. "Headscarves, Human Rights, and Harmonious Multicultural Society: Implications of the French Ban for Interpretations of Equality." Law & Society Review 41, no. 3 (2007): 699-736.
[84] Carle, "HIJAB AND THE LIMITS OF FRENCH SECULAR REPUBLICANISM."

only partial. The 1905 Act finally imposed total secularism, prohibiting any state recognition, funding or endorsement of religious groups.[85]

Laïcité was further enshrined in France's conception of republicanism by the decisions of the Stasi Commission, which established that:

> the secular state, guarantor of freedom of conscience, protects not only freedom of religion and of speech but also the individual; it allows all to freely choose, or not, a spiritual or religious option, to change it, or to renounce it. It makes sure that no group, no community can impose on anyone a belonging or a denominational identity, especially because of his or her origins.[86]

Here one finds a notion of secularism that differs from the liberal tradition of separation of church and state more familiar to American observers. While American freedom of religion mandates that religion be protected from the state, France's semi-theocratic heritage led to the belief that the state and its citizens should be protected from religion. In this way, overt expression or identification with a particular religion or religious group is seen as a threat to the state and its secular values.

During the French Revolution, groups known as Jacobin Clubs began to appear. These clubs constituted the most popular political group of the Revolution. Before long, the term "Jacobin" came to refer to anyone who supported revolutionary ideas. Preference for centralization of control and a unity of value systems, characteristic of France, stems from this tradition. In contemporary France the centralized, unitary Jacobin system necessitates an individualist relation between the state and people. This means that no institutions or groups should represent citizens within a society. The Jacobian philosophy insists that a uniform, republican identity must take precedence over any other aspect of an individual's identity, be it

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[85] Wiles, "Headscarves, Human Rights, and Harmonious Multicultural Society."
[86] Commission de réflexion sur l'application du principe de laïcité dans la république. Rapport au Président de la République. (Reflection commission on the application of the principle of secularism in the Republic. Report to the President of the Republic) La Documentation Française. Paris, 2003.

linguistic, religious, ethnic or other.[87] Simply put, a citizen's individuality should be emancipated from the pressures of groups seeking to control members' identity through coercion.[88] Therefore, within the public sphere, the French people are to relate to one another first and foremost as a single, unitary group of citizens. This, it is believed, is the greatest guarantor of national identity.[89] In this system, the ethnic citizen does not and *should not* exist.

For this reason, French notions of integration revolve around assimilation. One must shed one's minority identity in favor of "Frenchness" and strive to achieve cultural similarity. France's approach to colonizing Algeria reflected this approach to assimilation. The colonization of Algeria was not merely economic, but cultural as well. The French Republic, to a certain extent, considered the Algerians to be *really* French. Indeed, as Vivian notes, "much of the historical interaction between France and Algeria was characterized by France's recurrent assertion that Algeria was essentially French."[90] They erected French-style architecture in Algerian towns and encouraged the Algerians to adopt the French language.[91] Additionally, in the early days of the Algerian colonization, the French military enacted a policy of forced assimilation that included the unveiling of Algerian women.[92]

Seen in this way, secularism and French republicanism are as deeply intertwined as the monarchy and Roman Catholicism. If French republicanism mandates a uniform populace, then religion must remain wholly absent from the public sphere. Within this framework, Christianity and Judaism present no real threat to republican values because, in most cases, there is no outward or "ostentatious" marker of "otherness" among these groups. They are rarely seen

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[87] Wiles, "Headscarves, Human Rights, and Harmonious Multicultural Society."
[88] Thomas, "Keeping Identity at a distance."
[89] Ticktin, "Sexual Violence as the Language of Border Control."
[90] Vivian, Bradford. "The Veil and The Visible." Western Journal of Communication 63, no. 2 (Spring1999 1999): 115.
[91] Wiles, "Headscarves, Human Rights, and Harmonious Multicultural Society."
[92] Ibid.

wearing overt markers of their faith and do not often participate in public expressions of their religion such as praying in the streets. French Muslims, however, are a highly visible and identifiable group both ethnically and religiously.[93] The majority of French Muslims are of North African heritage. Therefore, they are ethnically distinct from those members of the French population whose ancestry is strictly European. Furthermore, many Muslim women practice veiling, choosing to wear the burqa, niqab, or hijab. These veils, though not historically Muslim, today function as the most recognizable symbol of Islam. These outward markers of religious membership are seen as a threat to French republicanism, a refusal to assimilate and a violation of *laïcité*.

Veiling and *Laïcité*

Since the veil controversy first emerged in 1989, it has been tied to the concept of *laïcité*, one of the most fundamental republican values. During the Creil affair, the headmaster justified his decision to suspend the two young girls for wearing hijabs by claiming that it violated *laïcité* by placing a highly visible marker of religion in the most sacred of secular institutions, the public school.[94] By asserting the girls right to wear religious attire, the *Council d'état* reinforced *laïcité* and asserted the state as a governing entity that would not restrict religious expression. It qualified this decision by stating that such attire should not be "ostentatious or provocative" in a way that could constitute propaganda.[95] Using this element of the decision, the Minister of Education, Lionel Jospin, issued a (non-binding) document stating that "ostentatious or provocative" symbols should not be worn in schools. [96] Throughout the 1990's, girls continued to challenge administrators by wearing headscarves and state and national officials continued to

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[93] Castéra, Isabelle. "Une place pour L'islam." (A place for Islam) Sud Ouest. Bordeaux Rive Gauche, September 13, 2010.
[94] Gaspard and Khosrokhavar, *Le Foulard et le République*. (The Scarf and the Republic)
[95] Quelques Grands Avis, n*346.893. Conseil d"Etat, 1989. http://www.conseil-etat.fr/cde/node.php?articleid=1375.
[96] Wiles, "Headscarves, Human Rights, and Harmonious Multicultural Society."

search for ways of outlawing these symbols from public schools. Tensions continued to rise as the issue remained unresolved.

In 2003, President Jacques Chirac established the Stasi Commission to investigate the application of the principles of *laïcité* in the Republic[97] and tasked it with producing a report detailing suggestions for implementation.[98] Chirac's government highly publicized these conclusions and sought to harness *laïcité*'s broad public legitimacy to shape a new consensus about how to best integrate the large and increasingly visible French-Muslim population.[99] As part of this plan, the report called for a law banning "ostentatious" religious symbols in public schools. It argued that the purpose of public schools was to assure "autonomy" and "openness to cultural diversity" and that the assumption of secularity was inherent.[100] This resulted in the 2004 law banning "ostentatious" religious symbols in schools. Although in theory this law applied to all religions, many Muslims saw it as an attack on their faith.[101]

In this way, the Commission established the defense of *laïcité* as grounds for limiting the expression of difference and even the expression of cultural and religious identity.[102] The Commission reaffirmed assimilation as the best means of integration, cautioning that:

> …the exacerbation of cultural identity should not become a fanatical defense of difference, binging with it oppression and exclusion. In a secular society, each person must be able to take some distance with regard to tradition.
> The law itself reflects the importance of secularism in French society.[103]

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[97] Thomas, "Keeping Identity at a distance."
[98] It should be noted that, during this time, Nicolas Sarkozy was serving as Interior Minister and, in an attempt to demonstrate solidarity with Muslims, permitted a Muslim Council to formally represent Muslim views. This council still exists today.
[99] Thomas, "Keeping Identity at a distance."
[100] Wiles, "Headscarves, Human Rights, and Harmonious Multicultural Society."
[101] Stephen M., "French-Muslim Reactions to the Law Banning Religious Symbols in Schools."
[102] Thomas, "Keeping Identity at a distance."
[103] Commission de réflexion sur l'application du principe de laïcité dans la république, *Rapport au Président de la République*.(Reflection commission on the application of the principle of secularism in the Republic. Report to the President of the Republic)

This decision set an important precedent. It created legal justification for the limitation of individual and religious expression. For this reason, it was essential that the burqa be framed as a threat to 'republican values', particularly, *laïcité*. In framing the act of full veiling this way, the French press created a scenario in which policy makers were justified in limiting the religious expression of Muslim women.

The law banning full veiling makes no mention of Islam, Muslims, the burqa or niqab.[104] This marks it as a secular bill because it does not overtly regulate religion or a religious practice. In this way, *laïcité* is preserved. However, Sarkozy himself has made it clear that the law is intended to target the practice of full veiling.[105] He repeatedly insisted that the veil is unwelcome in France. This insistence, coupled with the law's widely used nickname, the "Burqa Ban", made it obvious that while the law itself is secular, it was intended to limit a religious practice.

Laïcité continues to be an important concept in discussions of Muslim veiling. This evidenced by the frequency with which this and other republican values appeared in press coverage of the "Burqa Ban." In fact, even the date of the National Assembly's vote on the ban pointed to France's secular roots. They voted on the Eve of Bastille Day, "when France celebrates the birth of what was to become a staunchly secular republic."[106] The concept is so important that prior to the implementation of the "Burqa Ban" in April 2011, Nicolas Sarkozy called for a national dialog on secularism and the place of Islam in France.

Many scholars have found the tension caused by veiling in France to be binary in nature. Ardizzoni discussed the rhetoric surrounding the veil in France as being couched in terms of

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[104] "Egypt Al-Azhar scholar supports French niqab ban." Agence France Presse, September 15, 2010.
[105] Ibid.
[106] "French lawmakers approve full veil ban." Agence France Presse, July 13, 2010.

restricting binaries: secularism vs. Islam, Us vs. Them, and East vs. West.[107] Silverman argued that the initial headscarf affair in 1989 was constructed in terms of a "binary opposition between secularism and difference" in a debate in which "Islam denotes religion whereas the secular republic is beyond religion; Islam as obscurantist and anti-rational where as the secular republic is founded on the rationalist principles of the Enlightenment."[108] For Croucher, this binary is manifest as a conflict between Islam and Christianity and the inability of a government institution to control identity formation and negotiation effectively.[109]

Implicit in most discussions of the veil in France is the necessitation of assimilation mandated by a neocolonial interpretation of *laïcité*. Gudykunst and Kim define assimilation as "a state that reflects a maximum convergence of strangers' internal conditions with those of the natives and a minimum maintenance of the original cultural habits."[110] While they argue that assimilation creates more "functional" immigrants, other scholars assert that assimilation can lead to feelings of isolation, depression, hatred toward the host culture, and to a state of monoculturalism.[111] In his many works on the subject, Croucher found that French Muslims perceived *la Loi* 2004-228 to be a symbol of forced assimilation.[112]

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107 Michela, Ardizzoni, "Unveiling the Veil: Gendered Discourses and the (In)visibility of the Female body in France,." *Conference Papers -- International Communication Association* (May 23, 2003): 1-26.

108 "N° 2262 - Rapport d'information de M. Éric Raoult fait au nom de la mission d'information sur la pratique du port du voile intégral sur le territoire national," n.d., http://www.assemblee-nationale.fr/13/rap-info/i2262.asp. (The informational report of Mr. Éric Raoult in the name of the inquiry of the practice of wearing the full veil in the territory of the state)

109 Croucher, "French-Muslims and the Hijab: An Analysis of Identity and the Islamic Veil in France"

110 William Gudykunst and Young Yun Kim, *Communicating with strangers: an approach to intercultural communication* (Boston: McGraw HIll, 2003).

111 See Croucher "French-Muslim Reactions to the Law Banning Religious Symbols in Schools: A Mixed Methods Analysis"; Croucher, "French-Muslims and the Hijab: An Analysis of Identity and the Islamic Veil in France"; Chi-Ah Chun and Jung Min Choi, "The violence of assimilation and psychological well-being," in *The emerging monoculture* (New York: Praeger, 2003), 75-84. ; Nathan Glazer, "Assimilation today: is one identity enough?," in *Reinventing the melting pot: New immigrants and what it means to be American* (New York: Basic Books, 2004), 61-74.; Mark Kramer, *The emerging monoculture* (New York: Praeger, 2003).

112 See Croucher "French-Muslim Reactions to the Law Banning Religious Symbols in Schools: A Mixed Methods Analysis" and Croucher, "French-Muslims and the Hijab: An Analysis of Identity and the Islamic Veil in France"

All this is not to say that France is racist, nor that it has a "race problem". Rather, it seems, that France is wrestling with issues faced by all former colonial powers. The challenges that the Muslim population poses to French republican values, first raised by colonialism, have been exacerbated by globalism and a seemingly irresistible trend towards cultural homogenization. In an article published by AFP, France's Justice Minister acknowledged this difficulty, arguing that "at a time where our societies are becoming more global and complex, the French people are pondering the future of their nation. Our responsibility is to show vigilance and reaffirm our commonly-shared values."[113]

"An Important Decision for the Values of the Republic"

Having discussed French republicanism and the values therein, one must now ask, what are the republican values referred to in French press coverage of the "Burqa Ban"? How are they used and to what end? The two most commonly used values in connection with "republican values" are *laïcité* (secularism)[114] and the government frame of living together.[115] Discourse in the press also treated gender equality (as discussed in the previous chapter) as a republican value. Most often, however, the press used threat posed to "republican values" as a stand-alone frame,

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113 "French lawmakers approve full veil ban."

114 See Jaigu, "Guaino: 'Il faut garder son sang-froid'." (He must keep his cold blood); Courtois, "France; La France partagée entre déprime et crise de nerfs." (France: France is divided between depression and a crisis of nerves) ; "Chronique; Voile intégral et consensus républicain." (Chronology: The full veil and republican consensus); Le Bars, ""Les revendications identitaires sont inquiétantes" (The identity claims are disturbing).; "Repères." (Indicators); Didier, "Responsabilité; Une Toul."(Responsibility to who); Rouquette-Valeins, "Loi Anti-Burqa Contestée depuis des mois, la loi va être discutée aujourd'hui par les députés et mélanger religion, läcité et droit des femmes; une loi contre quoi et qui." (The Anti-Burqa law has been contested for months la law will be discussed today among mixed religions, secularism and women's rights; a law against who and what); Castéra, "Une place pour L'islam." (A place for Islam); De Laage, "La loi anti-burqa au défi de la gestion Guéant." (The anti burqa law challenges the management of Guéant); Chassain, "L'évêque qui fait parler." (The Bishop who speaks out); "Hexagone Frais." (A fresh Hexagon); Hanin, "Ne pas stigmatiser l'islam." (Do not stigmatize Islam)

115 See Gabizon, "Le voile intégral contraire au 'contrat social républicain'." (The full veil is against the republican social contract); Perrault, "Le Conseil constitutionnel valide la loi sur le voile islamique intégral." (The Constitutional Council approves the law against the full Islamic veil); Le Bars, "Projet de loi interdisant le voile intégral: le 'consensus républicain' s'éloigne." (The project on the law banning the full veil: the republican consensus is divided); "La 'persuasion' des policiers face au niqab." (The 'persuasion of policemen facing the niqab); "French lawmakers approve full veil ban."; Didier, "Responsabilité; Une Toul." (Responsibility: To who); "Le niqab au rancart." (The niqab discarded)

void of any description or qualification. "Republican values," then, should be read as the values of secularism, assimilation and gender equality. The first two of these values, being enshrined in the founding principles of French republicanism, are values that no French citizen could object to. Therefore, even at its most basic level, the frame of "republican values" is both powerful and persuasive.

Press coverage of the "Burqa Ban" framed French "republican values" as being threatened[116] or in need of protecting.[117] This frame was extremely effective in legitimating the "Burqa Ban" because any reasonable citizen would want to protect their national values. It is also an argument that was necessary in order to justify legal restrictions.

This frame was particularly salient because, as *Le Figaro* reports, many French citizens "worried about their country in decline. Many of them fear that communitarianism is weakening national cohesion and solidarity."[118] Communitarianism, or, *communautarisme*, is considered to be a danger, underpinning this is the assumption that, if society becomes divided into different and clearly identifiable groups with mutually exclusive values, these groups will ultimately come

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[116] See Born, "Retrouvailles en Aveyron des 'bébés Chirac'." (Retrouvailles in Avevron 'Baby Chirac'); "Femmes au burqa de la crise de nerfs." (Women wearing the burqa have a crisis of nerves); Didier, "Responsabilité; Une Toul." (Responsibility: to who); "Le niqab au rancart." (The niqab discarded); "Europe-Africa news agenday for May 11."; "French parliament adopts resolution condemning Islamic veil."; Le Bars, ""Les revendications identitaires sont inquiétantes:". (The questions of identity are disturbing); Roger, "Pour 2012, M. Copé rêve d'une 'droite de conviction'." (For 2012, Mr. Copé dreams of a 'right of conviction'); Riofol, "Démocratie: revenir au monde d'emploi." (Democracy: return to the job world)

[117] See "Huttopia va créer un camping nature." (Huttopia to create a camping ground); "G. Bourdouleix se prononce contre le voile intégral." (G. Bourdouleix announces he is against the full veil); "Le Conseil constitutionnel valide la loi sur la burqa." (The Constitutional Council approves the law against the burqa); "French lawmakers approve full veil ban."; "Burqa: le PS propose sa loi et devrait voter la résolution UMP." (Burqa: the PS propose a law and should vote on the UMP resolution); Le Bars, "Projet de loi interdisant le voile intégral: le 'consensus républicain' s'éloigne." (The project on the law banning the full veil: the republican consensus is divided); Jaigu, "Guaino: 'Il faut garder son sang-froid'." (Guaino: 'He must keep his cold blood'); Gabizon, "Le voile intégral contraire au 'contrat social républicain'." (The full veil is contrary to the republican social contract); Perrault, "Le Conseil constitutionnel valide la loi sur le voile islamique intégral." (The Constitutional Council approves the law against the full Islamic veil); Buruma, "Le virage à droite de l"Europe." (Right leaning Europe)

[118] Riofol, Ivan. "Démocratie: revenir au monde d'emploi." (Democracy: return to the job world) Le Figaro, July 16, 2010, sec. Le Figaro Opinions.

into conflict with one another.[119] This reference to the precarious balance which national cohesion must constantly negotiate can, understood in the context of French republicanism and its ideal, uniform populace, be conceived as a failure by the Muslim population to satisfactorily integrate into French society. This perceived failure to integrate points to the fact that both ethnically and religiously, Muslims in France constitute a highly visible subset of the population, a subset which, according to this particular political philosophy, ought not exist.

The fears expressed by *Le Figaro* are made more apparent when one considers that "71 percent of the French believe that their country is in decline (against 66% in 2005)." Indeed, the recent fiscal crises and high unemployment rates gripping Europe has triggered fear and strong antipathy towards immigrants[120] and many are asking themselves what it means to be French today.[121] However, many French believe that the country is capable of reform.[122] The "Burqa Ban," then, became necessary in order to reverse national decline because full veiling was framed "contrary to the basic requirements of living together in French society."[123] This law offered a solution to the problems the burqa has come to symbolized.

The ethnic and religious visibility of Muslims in French society also contributed to the perceived threat to secularism and other republican values. Indeed, "as the Muslims are of a greater visibility, non-Muslims have the feeling of being invaded,"[124] this feeling is complicated by the growth in the Muslim population during the past century. This visible growth and the perceived threat that accompanied it has given rise to a number of questions. In an interview with *Le Figaro*, Henri Guaino insisted:

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[119] Thomas, "Keeping Identity at a distance."
[120] "AFP Asia press comment." Agence France Presse, September 17, 2010.
[121] Castéra, "Une place pour L'islam." (A place for Islam)
[122] Riofol, "Démocratie: revenir au monde d'emploi." (Democracy: return to the job world)
[123] Gabizon, "Le voile intégral contraire au 'contrat social républicain'." (The full veil is contrary to the 'republican social contract')
[124] "Musulmans et non musulmans doivent se parler." (Muslims and non-Muslims should talk)

> behind the burqa is asked a question essential for our future: at the end of purposes, what kind of society to do we want to live in? Yes or no, do we want a Republic? Yes or no, do we reject communitarianism? Yes or no do we want equality of man and woman? Yes or no do we want to defend our identity, our model of civilization, our conception of secularism? Now is the time that each must answer.[125]

This is a clear and effective attempt to rally French citizens behind the ban. It implied that continuing to allow the burqa to be worn publicly would signal the downfall of French society and the republican values that underpin it. Guaino's insistence that "now is the time"[126] made the threat feel imminent, as if a decision to ban the burqa had to be made immediately, for the sake of France.

The high visibility of the Muslim population, symbolized by the burqa, is seen as rejection of 'republican values' because it suggests that Muslims have chosen membership to their religion over French citizenship. This is intolerable under the French conception of secular republicanism. Therefore, a law needed to be passed in order to promote effective assimilation by forcing French Muslim women to cast off the garments that publicly mark their allegiance to Islam.

The press consistently framed the act of banning the burqa as necessary in order to protect the republican value of living together. This is closely tied to ideas of assimilation and integration inherent in French republicanism. By wearing burqas and niqabs, Muslim women publicly mark themselves as followers of Islam, a practice inconsistent with that of a uniform populace. In fact, Justice Minister Michèle Alliot Marie defended the justified the bill, insisting

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[125] Jaigu, Charles. "Guaino: 'Il faut garder son sang-froid'." (He must keep his cold blood) Le Figaro, May 8, 2010, sec. Le Figaro France.
[126] Ibid.

that the burqa constituted "a refusal of the spirit of the Republic, who lives openly, and calls into question the idea of integration."[127]

The "citizenship course" offered to women who have been caught wearing the full veil in public places as an alternative to paying a fine reflected the concern over the failure of some Muslims to integrate into French society. The assumption here is that if the women are educated on what it means to be a French citizen, they will assimilate more effectively and embrace French republicanism. The "citizenship course" suggests that French Muslims do not share the same history or culture as other French citizens.[128]

The popular support that the ban received reflected the effectiveness of the frame that the burqa threatened "republican values." French papers reported that "more than eight in 10 people in France said they would approve of a ban on Muslim women wearing full veil s in public," and that only 17 percent of French people opposed a ban on burqas.[129] The salience of this frame was also reflected in the outcomes of the vote taken on the ban in both the National Assembly and the Senate. The National Assembly approved the ban by a vote of 355 to one while the Senate approved it by an overwhelming majority of 246 to one.[130]

Contesting the Dominant Frame

Interestingly, the defense of "republican values" was not a universally accepted frame. In fact, many editorials and interviews rejected this frame, suggesting that it distracted from the real problems faced by society. Though he considerd the burqa to be an "attack on republican

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[127] Le Bars, Stéphanie, "Projet de loi interdisant le voile intégral: le 'consensus républicain' s'éloigne." (The project on the law banning the full veil: the republican consensus is divided) Le Monde, July 8, 2010, sec. Politique.

[128] Rouquette-Valeins, "Loi Anti-Burqa Contestée depuis des mois, la loi va être discutée aujourd'hui par les députés et mélanger religion, lácité et droit des femmes; une loi contre quoi et qui." (The Anti-Burqa law has been contested for months, the law will be discussed today among deputies and mixed religions, secularism and women's rights; a law against who and what)

[129] "Europeans approve, Americans reject Muslim veil ban: study." Agence France Presse, July 8, 2010.

[130] In both cases the Socialist party abstained from the voting process, protesting the decision to ban the garment in *all* public places instead of limiting the ban to publicly owned institutions (such as hospitals and government buildings).

principles of equality and anticommunitarianism," Jean-Michel Quillardet, president of the International Observatory of Secularism, expressed fears that "secular fundamentalists…are now using the defense of secularism to fight the 'Islamization of society'…this is particularly disturbing because these people never talk about secularism against Christianity or Judaism, even though there is fundamentalism in all religions."[131] Furthermore, in an editorial examination of France's "national mood", *Le Monde* reporter Gerard Courtois asserted that while *Le Monde* denounces "all obscurantism, fundamentalism and practices detrimental to human rights or dignity of women (and the wearing of the full veil)… the problem is not the principles, but the relevance of the means used to enforce them effectively."[132] These opinions represented opposition to the frame, but not to the ban itself. It is the means of achieving the results that Quillardet and Courtois questioned. This is because many believed that the law would be difficult to enforce and would unfairly stigmatize a vulnerable group.

Other editorials pointed out discrepancies in the enforcement and protection of *laïcité*. In a section entitled *Vos choix*[133]which closely resembles the US model of Letters to the Editor, a reader asked his fellow countrymen how such a law could be imposed "when we allow all our soccer players to sign on many occasions when they go on the field, or pray to a god when they score a goal?"[134] This illustrates the inconsistencies of *laïcité*. With most of France being Roman Catholic (by heritage if not by practice), such an act would not be considered an affront to national values because it appeals to a value (Christianity) which most members of the French

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[131] Le Bars, Stéphanie, ""Les revendications identitaires sont inquiétantes:". (The identity questions are disturbing) Le Mnde, July 4, 2010, sec. Politique

[132] Courtois, "France; La France partagée entre déprime et crise de nerfs." (France: France is divided between depression and a crisis of nerves)

[133] Your choice

[134] Voilepastaface, JMP. "Vos choix." (Your choice) Midi Libre. Catalan; Lozere; Rodez; Millau; Carcassonne; Narbonne; Beziers; Ales; Gard Rhodanien; Sete; Lunel; Lodeve; Montpellier; Nimes, April 12, 2011.

population share. A similar discrepancy can be found in the text of the law itself. Although it outlaws full-face coverings in all public places an exception is made in the verbiage of the bill for "Father Christmas costumes". [135] In this way, full-face coverings worn by Muslim women are banned, yet an exception is made for Santa Claus costumes. Although he is a secular figure, Santa Claus is inextricably linked to the Christian holy holiday of Christmas. Here again, the religious expression of a group of "outsiders" is regulated while an exception is made for those whose values are considered mainstream.

These discrepancies reflect the inherent ambiguousness of frames such as "republican values". The meaning of these values vary from person to person, yet everyone believes in protecting what they deem to be "republican values." It is for this reason that the frame was so salient.

Conclusion

The success of this frame in legitimating and necessitating the "Burqa Ban" is not surprising. As numerous articles examined for this project indicate, France is in the midst of an identity crisis. High levels of unemployment, economic distress, social tensions, calls for immigration reform and the effects of globalization are taking their toll on this once culturally unique country. Many French citizens feel that their culture, their language, and their values have been threatened by these forces.[136] Given this tense societal climate, framing a law as necessary for the protection of foundational French republican values virtually guarantees popular support.

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[135] "N° 2262 - Rapport d'information de M. Éric Raoult fait au nom de la mission d'information sur la pratique du port du voile intégral sur le territoire national." (The informational report of Mr. Éric Raoult in the name of the inquiry of the practice of wearing the full veil in the territory of the state)

[136] "Parti socialiste: oblier le 21 avril." (Socialist Party: Forget April 21) Midi Libre. Catalan; Lozere; Rodez; Millau; Carcassonne; Narbonne; Beziers; Ales; Gard Rhodanien; Sete; Lunel; Lodeve; Montpellier; Nimes, October 10, 2010.

The social tensions, immigration concerns and cultural heterogeneity that France is experiencing today is considered by many to be a product of failed assimilation. Therefore, emphasizing the importance of republican values such as "living together", "respecting the same values",[137] and integration was an effective way to legitimate legislation to such threats because no French citizen could object to these values. This frame functioned to unite French citizens under the cause of protecting their fundamental national values.

Since French revolutionaries overthrew the monarchy and its cohort, the Roman Catholic Church, *laïcité*, or secularism, has been an essential component of French republican identity. French Muslims pose a unique threat to that value because they are an ethnically and religiously visible group. The burqa itself is seen as a jarring marker of religiosity in public sphere, an imposition of the private into the public, and a rejection of secularism. This is exacerbated by the practice of many Muslims, particularly in Paris and its suburbs, of praying in the streets. Evoking *laïcité* as a value that must be protected from these attacks functions as philosophical and political argument against the Muslim "other." Because *laïcité* is a value born on the eve of the Republic itself, it is virtually unquestionable. Indeed, the strength of this value is reflected in how little the press challenged its implementation.

In the French press, the burqa became a symbol of outside forces that threaten to weaken democracy from the inside.[138] It represents "the will of certain fundamentalist Muslims to question the values underlying the republican pact and humanism,"[139] and "a refusal of the spirit of the Republic, who lives openly, and calls into question the idea of integration."[140] By framing

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137 Born, Joêl. "Retrouvailles en Aveyron des 'bébés Chirac'." (Retrouvailles in Aveyron 'Baby Chirac') Midi Libre, May 2, 2010.

138 Riofol, "Démocratie: revenir au monde d'emploi." (Democracy: return to the job world)

139 Le Bars, "'"Les revendications identitaires sont inquiétantes:". (The identity questions are disturbing)

140 Le Bars, "Projet de loi interdisant le voile intégral: le 'consensus républicain' s'éloigne." (The project on the law banning the full veil: the republican consensus is divided)

the burqa and niqab as a challenge, threat or rejection of republican values, the French press created an argument against these articles of clothing guaranteed to persuade their audience. Republican values, after all, are values that no French citizen can object to. Therefore, in a time of deep national uncertainty, discourse in the press made the ban appear necessary in order to safeguard French culture. In short, it became the answer to France's national identity crisis.

Finally, and most importantly, by establishing the act of wearing the burqa or niqab as a threat to 'republican values', the French press created a rhetorical situation in which the limitation of religious expression could be legally justified. In order to ban the burqa, the historical and legal precedence set by the Stasi Commission in 2004 made it necessary for the burqa to be framed in this manner. Therefore, this frame was not accidental, nor was it original. Actors in the French press selected this frame from the traditional stock of frames that have been used in connection with Muslim veiling since controversy first arose in 1989. The use of this frame then, not only guaranteed popular and political support for the ban, by presenting national values as being in danger, it created a situation in which the banning of the burqa was not only legally defensible, it was necessary.

Conclusion

This project stemmed from a life-long love for, and fascination with, French culture. As a graduate student, my interest in the French press and, particularly, the treatment of politics in the French press has been the incessant subject of my research. When, in May of 2010, I became aware of a piece of proposed legislation in France that would result in the banning of the burqa and niqab in all public places, I knew that I had stumbled upon my next research project.

The veil has been a controversial symbol in France for more than 20 years and debate about the place of Islam in French society dates back to the colonization of Algeria. For this reason, a wealth of scholarly discourse on these subjects exists. However, to date no one has published on the "Burqa Ban" in France. This study, then, fills a hole in scholarly discourse addressing veiling in France.

The implications for French legislative history make this law an important subject for research and criticism. The law demonstrates a break from French legal precedence. Previous legislation has been limited to regulating the religious expression of minors in pubic schools, which are publicly owned and therefore public institutions. This is because minors in France are not deemed legally capable of making informed decisions about group membership and identification. Other legislation has targeted the religious expression of adults, but this has been limited to government employees working in publicly owned spaces. These employees, as government representatives, should not display membership to any group (other than the French Republic) that may affect they way other citizens interact or perceive them. The current law, then, breaks from this legal precedence by limiting the religious expression of *adults* in *all* public places.

I conducted this study with the purpose of understanding the role the French press played in legitimating the "Bruqa Ban." Four research questions guided this study:

1. How was the state-determined political agenda promoted or opposed in the French press to legitimize or delegitimize the "Burqa Ban" legislation?
2. What frames and arguments were used in the legitimation and delegitimation process?
3. Were state-determined frames of the issue reflected in news coverage of the legislation?
4. Were oppositional voices represented in the French press?

Findings

At the onset of this research project, I expected to encounter frames that directly reinforced those presented by the French government in a document acquired by *Le Figaro*. In a statement of reasons for the bill and in order to banish full veiling, the drafters of the document "evoke the dignity of the human person – even though some women would be willing – public order in its broad sense, that of living together, and finally, issues of security."[141] These frames became the template for state-determined frames, or reasons that the law was necessary.

However, this study found the state-determined frames to be less salient that frames traditionally associated with veiling. France's contentious history with the veil meant that a stock of frames used to describe the problem of veiling had already been cultivated. Reece's work on framing illuminates the reason the state-determined frames were less salient. "Political debate," he argues, "largely takes place with in the boundaries set by the (dominant) frame." Once this dominant frame has been established, it is extremely difficult fro another frame to be

[141] cgabizon@lefigaro.fr, "Loi sur la burqa." (The law against the burqa)

advanced. Because previous political debates about veiling in France did not include these frames, they did not enter the discourse surrounding the "Burqa Ban."

Interestingly, the French press incorporated two of the state-determined frames into two of the frames most commonly associated with veiling in France. Suggesting that the frame violated the dignity of the human person framed the veil as a human rights issue. The French press incorporated this into the "women's rights" frame. By characterizing the burqa and niqab as a garment that imprisoned women, discourse in the press evoked the dignity of the human person while still wielding a frame with demonstrated salience. Additionally, the concept of living together became an important component of the frame that the burqa threatened "republican values." Therefore, while these government-determined frames did not appear as stand-alone descriptions of the problem of the burqa, they still functioned as important sub-frames.

The most salient government frame was that the burqa constitutes a threat to national security. The fear of the veiled woman as a terrorist dates back to the French colonization of Algeria, and specifically, the Algerian war. The veil became a sign of resistance during the Algerian War for Independence from 1954 to 1962. Indeed, during the war, fully veiled women "served as messengers and secretly carried weapons or explosives beneath their coverings."[142] Just as the assimilation of women became the focal point of colonization, Evans argues that "it was [veiled] women above all else who were emblematic of the revolutionary process…through carrying weapons and grenades."[143]

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[142] Vivian, Bradford. "The Veil and The Visible." Western Journal of Communication 63, no. 2 (Spring1999 1999): 115.
[143] Evans, Martin. The memory of resistance: French opposition to the Algerian War (1954-1962). Berg, 1997. Pg. 191.

This memory of veiled women serving as aids to terror certainly, though perhaps not consciously, contributed to the link drawn between veiling and terrorism in the French press. This occurred in two primary ways. First, and most directly, discourse in the press linked veiled women themselves to terrorism. Additionally, the French press widely reported threats to French national security made by Osama Bin Laden in retaliation to the "Burqa Ban." Together with the memories of the Algerian War, these scenarios functioned to rhetorically link veiled women and the practice of full veiling to terrorism.

On three occasions the French press directly linked veiled women to terrorism and terrorist plots. The first of these took place on May 5, when AFP reported that an Indian plane had been forced to make an emergency landing in Kolkata "after two Russian passengers, including a woman in a burqa, behaved 'suspiciously' on board."[144] Authorities never disclosed the "suspicious" actions and ultimately released the women without charge, allowing them to continue their travels. Because authorities did not file charges or specify the "suspicious actions", the primary focus of the story is placed on the fact that one of the women wore a burqa, and refused to remove it. While no actual act of terror occurred here, the article inextricably linked veiled women to concerns of terrorism and national security.

The second instance in which the press discussed terrorism in connection with the veil evoked memories of the Algerian war, when women acted as terrorists and weapons smugglers. *Le Figaro* made this connection in the form of a news bulletin, printed on September 21. The Parisian daily reported simply and succinctly that a "woman suspected of being a possible suicide bomber in Paris" had been arrested.[145] This report followed a September 15 article in *Le*

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[144] "Indian plane scare caused by Russian in burqa: airport." Agence France Presse, May 5, 2010.
[145] Cornevin, Christophe, and Jean-Marc Leclerc. "Terrorisme: la police recherche une femme kamikaze." (Terrorism: police investigate female suicide bomber) Le Figaro, September 21, 2010, sec. Le Figaro France.

Figaro that announced the forced evacuation of the Eiffel Tower and a heavily trafficked commuter train station due to bomb threats made by terrorists.[146] The article led readers to assume that the woman was arrested in connection with the bomb threats made earlier in the week. Though no mention of the veil is made, the mere suggestion of a female Islamic terrorist would have stirred cultural memories of the role of women Algerian war. Furthermore, at a press conference held to announce the arrest, a passionate policeman exclaimed that "the law on the burqa…has stirred up fundamentalist anger!"[147]

Finally, following the enactment of the "Burqa Ban", *Sud Ouest* reported that Muslim women were being encouraged to "resist" the law and being assured that the fines incurred would be "paid by the community."[148] This report, made on April 11, the day the law came into force, stated that these calls for resistance came from "Islamists" via email and text messages The use of the term "Islamists"[149] and the mode of communication used to urge women to resist the law evokes previous reports on techniques used by terrorists to plot previous attacks. The encouraged resistance of women affected by the ban, supported by an entire community of Muslims emphasized the difference between the highly religious Muslim culture and strictly secular France.

The press widely reported threats by infamous terrorist and Islamic fundamentalist against French national security made by Osama Bin Laden. The discourse used directly linked these threats to the "Burqa Ban" and to "women's rights". Bin Laden voiced opposition to the ban, accusing France of "exercising oppression…by preventing free women from wearing the

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[146] Gabizon, Cécilia. "Deux alertes à la bombe dans la capitale." Le Figaro, September 15, 2010, sec. Le Figaro France.
[147] Cornevin and Leclerc, "Terrorisme: la police recherche une femme kamikaze." (Terrorism: police investigate female suicide bomber)
[148] De Laage, Dominique. "La loi anti-burqa au défi de la gestion Guéant."(The anti burqa law challenges the management of Guéant) Sud Ouest, April 11, 2011.
[149] *islamistes*

veil."[150] Here, the known terrorist reversed the "women as victims" manifestation of the "women's rights" frame. He argued that the oppression experienced by Muslim women did not come from the women themselves, their religion, their culture or their men, but from the French government. By banning the veil, he argued that the French government prevented the women from exercising their religion. He warned France that the ban on the veil justified "violence against its nations" and vowed to take revenge.[151]

This series of articles in the French press legitimated the ban in a number of ways. It invoked the frame of "women's rights" in an oppositional manner, arguing that the bill violated women's rights. It also reinforced the idea that Muslim men are savages. After all, if a known Islamic terrorist supported the burqa, then the rational course of action must be to ban the veil, which would reinforce French republican values and protect women from these dangerous men. Finally, it linked full veiling to terrorism and evoked painful and frightening memories of women's use of the burqa and niqab in the Algerian war. Together, these served as a potent cocktail of arguments in support of the ban on full veiling.

This study found frames traditionally associated with veiling in France to be the most salient and frequently used. These frames, "women's rights" and "republican values", are frames that united the French people under a common set of beliefs by describing the problem of the full Islamic veil in terms that resonated with their culture, heritage, and fundamental values. Furthermore, these frames could not easily be objected to.

The "women's rights" frame presented Muslim women as victims, making it necessary to pass a law that would "save" her from oppression. This frame, made possible by a rise in international awareness of human rights functioned as a moral and political argument that

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[150] Ourdan, Rémy. "Une déclaration de guerre de Ben Laden à la France." (Ben Laden declares war against France) Le Monde, October 29, 2010, sec. International.
[151] "Ben Laden menace la France." (Ben Laden threatens Fance) Ouest France, October 28, 2010.

reinforced a familiar narrative in which Muslim women are inescapably imprisoned by their culture, religion, and personal choices, and are therefore unable to function within mainstream French society. Excluded from this frame was a discussion of why women choose to veil themselves. Instead, the press presented veiling by force as the only true reason these women veil themselves.

Opposition to the "Burqa Ban" could also be found within this frame. It was in this opposition that the French press quoted the only woman who practiced full veiling. In April 2011, the month the ban became effective, the French press quoted Muslim men and women who expressed concern that the ban would further exclude the affected women from society. Some worried that "the proposal to prohibit the presence of women wearing the burqa or niqab in public institutions such as hospitals or government facilities [could] only result in discouraging women from going there."[152] Others worried that the law would result in their wives choosing to "remain cloistered at home"[153] and thereby isolating themselves because they felt unwelcome in public. Muslim women themselves asserted that the ban barred them from the public sphere and excluded them from French society, making it impossible for them to access and exercise their rights as citizens of the European Union.

The "republican values" frame suggested that French Republican values are in danger, need protecting, and are purposefully rejected by the French Muslim population. This strong political and philosophical argument resonated most clearly with the political elite, but also with the general population. In order to establish legal justification for limiting religious expression, which banning the burqa and niqab certainly did, French politicians, aided by the press, had to convince the French people that the full veil constituted a threat to secularism. Since the veil

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[152] Hammarberg, "L'interdiction de la burqa est inutile." (Banning the burqa is useless)
[153] "French woman defies burqa ban as law comes into force." Agence France Presse, April 11, 2011.

controversy first emerged in 1989, it has been tied to the concept of *laïcité*, one of the most fundamental republican values, this historical connection ensured the salience and familiarity of the framing of the burqa as a threat to "republican values."

Citizens objected to this frame in interviews and letters to the editor. They suggested that this frame distracted from the real problems faced by French society. Others contested that the law would be difficult to enforce and would unfairly stigmatize Muslims, an already vulnerable group. Some editorials pointed out discrepancies in the enforcement and protection of *laïcité*. In a letter to the editor, one Frenchman asked his compatriots to consider that soccer players are allowed to pray after scoring a goal, yet Muslim women could not wear a burqa. Such discrepancies reflect the inherent ambiguousness of the frame of "republican values."

It is significant that opposition to the law was expressed using the same frames intended to support it. This simultaneously emphasizes the effectiveness of dominant, salient frames and the difficulty of advancing a tertiary frame. However, because discourse surrounding the veil traditionally used these frames to delegitimize the practice of veiling, oppositional use of these frames was ineffective.[154]

The (under) Representation of Muslim Women

The most surprising finding of this study was the under-representation of Muslim women, particularly those who practiced full veiling, in press coverage of the "Burqa Ban." Only one article of the 158 analyzed for this project quoted a Muslim woman who wore a burqa. The ban affected this demographic most directly, yet they received the least amount of coverage in the press. Rather, the press predominantly interviewed and quoted men (and a few women) of European descent, leaving the female Muslim voice all but unheard.

[154] This opposition is deemed ineffective because discourse in the press primarily focused on the ban's broad support. The law ultimately passed with a sweeping majority and since it's enactment in April of 2011, little coverage has been given to the law.

It is likely that press coverage excluded these women for several reasons. First, Muslim women who practice full veiling constitute a very small (approximately .003%) and relatively isolated portion of the French population. Because the majority of these women live in the Paris suburbs it is possible that journalists working for regional dailies did not have adequate access to a burqa wearing woman. Furthermore, this law made Muslim women feel as though they were being intentionally excluded from French society and had little cause to believe that the press could affect this. Finally, the reasons for which Muslim women choose to veil themselves (religious, political, revolutionary, practical, etc.) strongly contrast with the dominant frames associated with veiling in France. For this reason, the opinions of Muslim women, particularly those who practiced full veiling) would have been difficult to advance.

The absence of the women most intimately and directly affected by the "Burqa Ban" from discourse in the press is alarming. If Muslim women truly felt that the "Burqa Ban" would liberate them, their support of the ban would have made for compelling and interesting news. However, the absence of such support in the press indicates that it did not exist. Given this, the absence of the opinions of Muslim women in the press represents a strong oppositional consensus that went largely ignored in coverage of the ban.

Methodological Limitations

In designing a research project, certain methodological decisions must be made that often limit the parameters of a study. In the case of this project, research was limited by the scope and size of the sample. The parameters of this study were significantly expanded from the original size and scope of the research proposal. Nevertheless, certain methodological decisions placed limitations on this project.

Firstly, this study was limited by the scope of the sample. This project looked only at those articles printed during the month of a legislative decision and the month that the law was enacted. Eleven months elapsed between the date that a draft of the "Burqa Ban" was first proposed and when it became an enforceable law. Of those eleven months, only 5 were included in the sample. This limited the time frame of the study and may have resulted in the exclusion of additional frames not present during the months analyzed here.

Secondly, this project made use of random sampling in order to create a manageable sample size. The creation of a manageable sample size naturally results in the exclusion of some articles from the data set. Including *all* articles published by the selected sources would have created a more complete research project.

Finally, no Arab language publications were included in this study. This decision was made for practical reasons, language limitations prevented access to such newspapers. It is possible that such publications included opinions and perspectives not found in mainstream, French-language news outlets that could have greatly enriched this study.

Suggestions for Future Research

In the field of Media Studies there are several methodological tools that inform research. In this study, I took a qualitative approach, focusing on the historical and contextual implications of the discourse found in the French press. Future studies could be enhanced by a mixed methods approach to the analysis of press coverage of the Burqa Ban. Such a study would particularly benefit from a Content Analysis, making use of statistical data to reinforce the findings of a Critical Discourse Analysis.

Scholars wishing to expand this area of research would be well advised to include news articles from Arabic publications in France. As previously mentions, such publications likely

include perspectives and opinions not present in the mainstream French press. For this reason, such publications could greatly inform scholars seeking to understand the role the French press played in legitmating the Burqa Ban.

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