contentious citizenship: feminist debates and practices and European challenges

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abstract

Citizenship is both a contentious and contested struggle about the creation of rights, duties, and opportunities. Feminist practices and debates can clarify the meaning of citizenship. This is because the form of feminist practices, characterized by an ongoing struggle, and the content of feminist debates, focusing on gender and other inequalities, recognition of different voices, and critiques of the public and private dichotomy, are particularly suited for dealing with the challenges of contentious and contested processes of citizenship. We argue more specifically that feminist debates and practices provide fruitful contributions for the citizenship challenges that the European Union must face.

keywords

feminist theory; European Union; citizenship

introduction

The concept of citizenship is inherently contentious, in that it necessarily involves drawing borders around questions of inclusion and exclusion and making decisions about which rights, duties and opportunities will be attached to the status of a citizen. It is a concept that can not possibly satisfy everyone, meaning that this drawing of borders and creation of rights, duties, and opportunities comes into being as a result of struggles, causing or being likely to cause disagreement and disputes among people with differing views. Contestations between specific articulations of citizenship rights, duties, and opportunities necessarily ensue. Because of its contentious and contested character, citizenship is always dynamic and is best understood as an ongoing process or a struggle about the creation of citizenship rights, duties, and opportunities.

This paper starts from one set of citizenship struggles – feminist debates and practices – to first clarify the meaning of citizenship as struggle. It then sets out to explore another locus of citizenship challenges in Europe, to identify whether lessons can be drawn from feminist accounts of contentious citizenship for the current citizenship challenges at the level of the European Union (EU). Our argument is that feminist practices, characterized by an ongoing struggle, and feminist debates, such as those on gender and other inequalities, recognition of different voices, and critiques of the public and private dichotomy, offer helpful insights for facing the challenges of citizenship within the EU. The paper includes three sections: the first outlines what in our view constitutes feminist practice; the second discusses the content of some of the most relevant feminist debates; and the third section reflects on the potential contribution of feminist debates and practices to challenges to citizenship within the EU, while also considering the limitations of this contribution.

feminist practice

The starting point of our argument is a procedural rather than content-related definition of feminism, based on the specific form of the processes that in our view characterize feminism. While contrasting with some of the scholarship that has developed typologies of feminism (Offen, 2000; Lorber, 2005), a procedural definition – as we will show – allows not only the hegemonic struggle of feminism with various types of gender inequality (or patriarchy) to be taken into account, but also encompasses hegemonic struggles within feminism. Including these intra-movement struggles is essential for feminist citizenship, as otherwise feminists would be reduced to just being part of a kind of pressure group fighting for women's rights.

First of all we need to clarify what we mean by a procedural definition of feminist practice. We see feminist practices as taking a specific form, characterized primarily by *ongoing struggle* around the proliferation of contested visions of gender equality and different debates on notions of gender, sex, and relations of domination and subordination (Fraser, 1989; Schmidt-Gleim and Verloo, 2003). The struggle is ongoing because *change* is the main concern of any feminist practice, which is necessarily nourished by the presence of conflicting and irreconcilable positions; feminist practice would be depoliticized, losing its *raison d'être*, by any 'final' attempt to find a consensus or a conclusive answer by imposing one particular feminist position on others. This reflection leads Schmidt-Gleim and Verloo (2003: 22) to define feminist practices as based on a multitude of feminisms, in which 'feminism' can only temporarily be given a specific position and therefore will be the object of an ever-ongoing process of struggle. This is in line with what Judith Butler calls 'productive antagonism' (Butler, 1993).

Defining feminism starting from its form rather than its content has at least two advantages (Schmidt-Gleim and Verloo, 2003). The first is that a focus on the form enables us to escape the trap of having to define a common 'women's identity' as prior to the feminist political struggle itself, thus having to connect the partiality of feminist perspectives to a supposedly universal subject that, ultimately, expresses only one partial position among others. Secondly, feminism understood as a constantly contested form better suits the need to adapt to the continuous transformation of the gender struggle[1] and its evolving strategies and agendas. A dynamic understanding of feminism hence not only offers better chances for hitting the moving target of gender inequality, but also enables wider sets of coalitions to profit from emerging political opportunities. It seems reasonable, therefore, to think of feminism as a theory and practice in movement.

A critical feminist position, therefore, entails, in Scott's opinion (1988), systematic criticism and a refusal of 'ultimate truths'. In particular, the format of ongoing struggle enables feminist discourses to challenge processes of assimilation to dominant (male and female) norms. This means that feminism not only criticizes assimilation to an unquestioned male norm, but also identifies an opponent within itself by uncovering processes of essentialism and hegemonization of particular groups of women that exclude many other feminist positions from the debate (Hooks, 1981, 1990; Lorde, 1984). The continuous deconstruction of the unstated 'norm' of dominant groups, in whatever form it may appear, can and should open a space for including the perspectives of subjects who have been excluded, so that differences are not translated into inequalities.

The theoretical format of feminist practices can be described as both constructionist and deconstructionist. It is constructionist because it conceives of reality as socially constructed and knowledge as contextual and situated, and interprets social construction as an invitation to act towards social change, as do, in different ways, Marxism, pragmatism, and neo-constructivism (Berger and Luckmann, 1966; Reed, 1973; Radin, 1990). It is deconstructionist because, like postmodernism, it stresses reality's fragmentation and diversity and the provisional character of truth, and rejects Western philosophy's hierarchical dualisms and its search for objectivity and a single all-encompassing theory. Like post-structuralism, it is interested in analysing and engaging in the construction and deconstruction of social meanings that characterize discursive processes (Scott, 1988; Nicholson, 1990). The feminist combination of constructionist and deconstructionist approaches feeds the ongoing struggle that enables the continuous generation of different partial, sometimes conflicting, positions in feminist debates; these keep the movement alive, and its practices up to newly emerging challenges and opportunities. However, the regulatory ideal of acknowledging the feminist subject as multiple and contradictory has not

always been put into practice, even though the feminist movement is increasingly aware of the necessity and advantages of this epistemological and political objective.

feminist debates

Within the framework of an ongoing gender struggle, a variety of feminist political debates on concepts, visions, and strategies are continuously taking place; examining these helps us to draw out some of the substantive features of feminist practices.

The variety of feminist traditions, or paths to achieve a society free from gender domination and oppression, have resulted in the articulation of three main visions of gender equality, each of which poses different challenges to politics, and which translate into different political strategies. First, gender equality can be conceptualized as a problem of achieving equality as sameness, which is associated with the strategy of equal opportunities. Second, equality is conceptualized as affirming difference from the male norm; positive action strategies accord with this approach, although they are not limited to it. Finally, gender equality can be seen as transforming all established norms, standards and routines of what is/should be female and male; gender mainstreaming has been considered as a strategy suitable to achieve this (Squires, 1999, 2005; Verloo, 2005; Walby, 2005). These three approaches have also been referred to as 'inclusion', 'reversal', and 'displacement', with each of these referring respectively to the principles of equality, difference, and transformation (Squires, 1999, 2005).

According to the vision of equality as sameness, the problem is that women have been excluded from the political realm, and the proposed solution is to include them in the world as it is, without challenging underlying male norms. The idea is that each individual, irrespective of gender, should have access to the rights and opportunities enjoyed by men and should be treated according to the same principles, norms, and standards. However, this feminist route is criticized for not directly challenging dominant patriarchal values.

In contrast, the 'difference' approach — or reversal — problematizes the existence of an unquestioned male norm that women must either imitate or be compensated for not attaining (Mackinnon, 1987). The proposed solution is then to reconstruct the political by seeking recognition of (women's) non-hegemonic gendered identities that have been treated as different from male normative identities and cultures. This vision is frequently associated with radical and cultural feminists (Ferguson, 1993; Squires, 1999).

In the vision of transformation or displacement, more typical of postmodern feminists, the gendered world itself is to be problematized, and not only the

exclusion of women or the existence of a male norm. The solution proposed is to move beyond the false dilemma of equality versus difference, by deconstructing political discourses that engender the subject. The understanding of gender as dynamic in this vision makes it particularly suitable to embrace the challenge of incorporating gender into the mainstream, a process that implies the continuous questioning of established categories and meanings both in the mainstream and in gender theory.

Within the framework of these theoretical visions of gender equality, all of which have been practically institutionalized, a variety of different political debates are taking place. Without claiming to encompass the multiple and varied panorama of current feminist political debates, we have chosen three debates that are crucial to feminist citizenship: gender and other inequalities, the question of voice for non-hegemonic actors, and the public/private dichotomy. Each debate contains not only partial answers, but also different sets of political positions, and different ways of outlining the puzzles and dilemmas that are an integral part of these discourses.

gender and other inequalities

Feminist theories generally share the adoption of the concept of gender as the central organizing and analytical principle of social reality. They share a perspective that sees gender as a 'complex and all-pervasive system of socially-constructed relations of power and subordination' in which sexual roles are created and differentiated (Vogel, 1991: 61). As the meanings that a society attributes to sexual difference are constantly changing, gender is a fluid and open concept, whose main core remains the socially constructed nature of sexual relationships, and whose most important characteristic is its close correlation with power.[2]

2 Power is used here in a Foucauldian sense as both enabling and constraining (see Foucault 1980).

Feminist theories focus on one structural inequality that is prioritized in practice, even if this prioritization has become increasingly contested. The question of how to frame gender in the context of the multiple differences and inequalities that exist among women has cut across debates in the last two decades. Black feminism's contribution to feminist debates on citizenship was crucial in making contemporary feminist scholars more aware of the dangers of essentialism and homogenization within the feminist movement (Hill-Collins, 1990). In the 1970s and 1980s Black feminists challenged normative assumptions of 'mainstream' feminism about 'women' as homogeneously 'white', which excluded from feminist debates the experiences and voices of Black women (Hull *et al.*, 1982; Brah and Phoenix, 2004). New theorizations were developed about the differences between women in terms of race, class, age, sexual orientation, ethnic origins, ability, and other complex inequalities (Hooks, 1981; Amos *et al.*, 1984; Lorde, 1984; Barrett and McIntosh, 1985; Bhavnani and Coulson, 1986; Harris, 1991; Anthias and Yuval-Davis, 1992; Yuval-Davis, 1997; Feminist Review Collective, 2005).

Most importantly, there has been an increased understanding that gender inequality can only be understood in its full complexity as being mutually constituted by other intersecting inequalities. Even if the current scholarship on intersectionality is in need of further clarification, definition and empirical testing (Nash, 2008), the question of intersectionality more generally steers the debate towards more complex ways of thinking and treating gender and other inequalities (Walby, 2007), by suggesting the need to overcome a simple bipolar logic of analysis that treats one type of inequality as compared to another, taking what appears to be the dominant one as the benchmark, instead of focusing on the theoretical and actual social and political problem that the various inequalities of race, gender, class, and so on intersect with each other (Crenshaw, 1989). Crenshaw's concept of political intersectionality, which indicates how inequalities and their intersections are relevant at the level of political strategies, is crucial here. This concept problematizes political differences, as strategies on one axis of inequality are generally not neutral towards other axes. It generates questions such as: how and where is feminism marginalizing ethnic minorities, or disabled women? How and where are measures on sexual equality or on racism marginalizing women? How and where are gender equality policies marginalizing lesbians?

Although the concept of intersectionality is widely used in academic studies, as yet, there are no studies analysing whether all possible intersections might be relevant at all times, or when and where some of them might be most salient. Some studies explore the ontology of different inequalities and reflect on possible implications for the ways in which they intersect (Yuval-Davis, 2006). For instance, McCall (2005) analyses gender, class, and race, and Verloo (2006) studies the ontology of gender, race/ethnicity, sexual orientation, and class. Although there are promising visions, such as Butler's statement[3] that 'the remaking of both gender and sexuality is what happens when both movements intersect', there is little understanding of which mechanisms generate territorial reflexes of defence of one's own group between movements connected to different inequalities, such as feminist; lesbian, gay, bisexual, transgendered, questioning; workers' or Black movements.

3 Statement made at the Sixth European Gender Conference, 31/8–3/9, 2006, Lodz.

Different positions in this debate can be identified as sometimes territorially prioritizing gender (for fear of loss of resources or acquired power or institutionalization), and sometimes outlining visions of the possibility of addressing political intersectionality through the installation of processes of democratic deliberation among diverse social groups that are differently positioned in relation to different structural inequalities (Young, 1990; Squires, 2005). Processes of deliberation are also contested because they could encourage an identity politics that freezes group identities, overlooks intersections, and undermines solidarity among diverse collectives, fostering instead coerciveness among group participants. In incorporating all this, feminist debates and practices

reveal how the concept of gender that is at the centre of feminist debates is constantly challenged by its relationship with other inequalities. In contrast, such debates and understanding still seem to be at an embryonic stage when it comes to policy making.

voices within feminist practices

Another feminist debate concerns the question of who has/should have a voice in the political debate over definitions of gender equality and how the problem of gender inequality should be solved. Contemporary struggles for recognition (Young, 1990, 1997; Taylor, 1992; Fraser, 1997) and political voice (Phillips, 1995, 2003) show how important it is for excluded policy actors to gain access to the public debate in order to influence the formation of public policy. The right to have a voice in the framing of a policy issue is closely connected to questions of power, and is related to the actual inclusion or exclusion of actors in or from the political debate. According to Fraser (1989: 181, 1997), existing hegemonization can be challenged only if there is some space for 'subaltern or non-hegemonic counterpublics' to participate in the debate. Otherwise, participation processes under conditions of inequality will tend to serve dominant groups and exclude subordinated groups from the opportunity to articulate their interests. Hegemonization processes also take place within social movements. The account provided by Williams (2003) of the struggle of Black, ethnic minority and migrant women to make their voices heard in the EU political arena shows that obstacles created by dominant groups and dominant ways of thinking can be found both at the institutional and civil society levels. People at the point of intersection of different inequalities, race and gender in this case, encounter difficulties in having their concerns heard and solved within civil society and institutional contexts that work solely on one inequality. In order to make their claims for recognition in the EU polity, organizations of Black, minority ethnic and migrant women had to fight for access on the two fronts of gender and race. On the one hand, Black, minority and migrant women had obstacles in making their voices heard by other women in the European Women's Lobby (EWL) due to their race, because the EWL's representatives in the 1990s were mainly white, middle-class, professional women, not particularly open to different women's voices (Hoskyns, 1996; Williams, 2003). On the other hand, their concerns as Black and minority women were not represented by the European Migrant's Forum, a civil society organization that was only focusing on race and disregarded gender intersections with race. Similarly to civil society organizations, EU institutions in the 1990s had begun to discuss issues of racism, but were treating race issues separately from gender issues (Williams, 2003). Another example of how voices of people at different points of intersection are lost within European institutional contexts is the difficulty in obtaining recognition for gender issues in the asylum process in many countries, such as the UK (Treacher *et al.*, 2003).

One recent aspect of the debate on political voice and recognition is described in the feminist literature as a tension between 'expertize' and 'democracy', an issue that has become even more evident in the context of the implementation of gender mainstreaming (Verloo, 2005; Walby, 2005). On one side stands the idea of gender equality policy as a political process of democratization in which women's voices are included in the policy-making process (Walby, 2005). On the other side, however, gender equality policy (especially gender mainstreaming) is increasingly organized as a technical process that policy makers should carry out, occasionally with the consultation of gender experts.

Gender expertize is an important element for making progress in gender equality policies (Verloo, 2001; Walby, 2005). However, the risks involved in the treatment of gender policy measures by technocrats have to do with the potential 'depoliticization' of the issue of gender inequality altogether (Squires, 1999, 2005). This could result both from the presentation of gender equality measures as technical procedures that include no political conflict and contestation, and from the exclusion of more radical feminist voices from the policy-making process (Squires, 2005; Verloo, 2005).

Although this duality of direction is used to describe and criticize a signalled 'technocratization' of gender mainstreaming, it has also been criticized for setting up a false dichotomy (Walby, 2005). In some cases, the two sides are not necessarily opposed, as seen in the formation of 'velvet triangles' between femocrats, academics, and the feminist movement (Woodward, 2004). These include, for example, the Northern Ireland 'participatory-democratic' approach to mainstreaming, based on the participation of civic groups in the policy-making process through consultations and hearings (Barnett-Donaghy, 2003), and practices such as the UK Women's Budget Group,[4] in which the union of academics, civil society, and policy makers has contributed to progress in the gendering of government budgets (Walby, 2005).

4 See http://
www.wbg.org.uk.

The result of these struggles for, and debates on, political voice is a continuous redefining of the borders of 'gender equality' as a concept. Little progress has been made to include intersectional categories in the political category of 'women'. Again, while the puzzles are far from solved and the cases where feminist ideas are translated into practices that can be multiplied are sporadic, feminist studies have contributed tremendously to the debates, even if most contributions seem to remain largely at a normative level, while empirical evidence is still scarce. There also remains the danger of (re)creating unproductive dichotomies, such as the division between 'experts' and 'civil society', in situations where constructive alliances, as well as oppositions, are possible.

defining the political: the public/private dichotomy

In the background of feminist debates frequently lies the fundamental issue of the definition of the political, and especially the feminist critique of the

gendered public/private dichotomy (Okin, 1991). Feminist actors have struggled for a broader definition of 'political' that includes issues such as violence against women, reproductive rights and the sharing of care work between the sexes, which were traditionally excluded from the public sphere and treated as 'private' or 'personal' issues. In this classical feminist debate, the two spheres are considered as deeply interrelated, due to the role of each domain in supporting and maintaining the other.

The public/private division has been at the core of conceptualizations of the main structures that contribute to maintaining and reproducing gender inequality, such as the organization of labour, intimacy and citizenship (Connell, 1987; Walby, 1990; Verloo and Roggeband, 1996).[5] The divisions of labour and intimacy reproduce the public/private dichotomy because the existing divisions between labour and care, and paid and unpaid work are based on a hierarchy between men and women that places women in a subordinate position. The organization of private life and relations with children are permeated by traditional notions of masculinity and femininity and the assumption of heterosexual complementarity. In the current organization of citizenship, there exists a hierarchy between women and men as concerns the enjoyment of the main civil, political, and social rights. Gender and ethnicity are not considered among the classic elements of political citizenship, such as voting and active participation and representation in political institutions, nor are they included in the definition of who can be a citizen and who can expect protection and security against which kinds of violence.

Feminist analyses of the policy problems that emerge from these structures, such as gender inequalities in family relations, in politics, and violence against women, stress both the critique of the traditional division between public and private spheres and the interdependence existing between the different spheres. They show, for instance, how gender inequalities in labour or intimacy affect the organization of citizenship and vice versa, in a chain in which the inequalities of one structure are both different from those of others and yet strictly interconnected with them. On specific policy issues feminist analyses show, for example, how domestic violence is treated either as a public or a private problem depending on the type of state involvement in the issue, the priority accorded to it, or the extent to which policies effectively target (male) perpetrators and the structural causes of violence (Bustelo *et al.*, 2005). They observe how state policies on employment and family matters can maintain or challenge a traditional gender division of labour, depending on factors such as the value attributed to the unpaid work of care or the extent to which policies encourage and facilitate the equal sharing between women and men of paid-productive and unpaid-reproductive work (Stratigaki, 2004). They discuss women's political participation pointing at the specific gender bias present in the public sphere of politics as major obstacles to women's political representation, with attitudes

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and practices of discrimination against women and institutional sexism occurring in the main political parties (Lovenduski, 2005). But they also interpret gender inequality in politics as strictly interconnected with aspects of the so-called 'private sphere', such as time devoted to care and reproduction, mainly by women, that could enable such participation (Phillips, 1995). In conclusion, we think that the debate concerning the public-private division is still highly relevant for feminist practices, as there are many gaps in political practices and policy making where issues are still considered private while being state-regulated for centuries, such as gender identity, sexual identity, love, and passion (to name just a few).

feminist debates and practices and EU challenges

While feminist struggles materialize in ongoing debates and practices concerning the complex interactions between gender and other inequalities, between different gender regimes and policy areas, between public and private spheres, and between a multiplicity of different actors, the EU polity also faces its own challenges. The first challenge concerns the nature of the Union as a polity characterized by continuously changing political dynamics and ongoing struggles over the political. This is due to factors such as the constantly evolving institutional, economic, political, and social context at the national and European levels; the changing geographical and political borders; and the emergence of new political actors, new concepts, and policies in the EU arena. Understanding such a constantly changing polity requires analytical approaches capable of dealing with the reality of ongoing transformation and contested concepts and structures.

A second important challenge that the EU faces is the integration of different identities within the same polity. Different aspects of this challenge are: the need to construct a European citizenship capable of acknowledging existing differences without assimilating different subjects under one normative identity; the need to deal with complex inequalities that characterize Europe's increasingly multicultural societies; the EU's ongoing enlargement to encompass new member states and constitution-making processes that are necessary to adapt institutions and policies to the upcoming challenges; and the articulation of debates on migration, mobility, and borders concerning who is considered a legitimate citizen of the Union. Some of these debates reflect on the construction of what Balibar (2005) has called 'European apartheid', where European citizenship raises citizens of national member states to the superior status of 'European citizens', and at the same time lowers non-citizens (who are mainly stable naturalized migrants) to the inferior status of residents with no rights. Others highlight the interdependence between the conditions of citizens and

non-citizens. Rigo (2007), for instance, conceives of European citizenship borders as politico-legal instruments that control the mobility of people by framing the two categories of 'citizens' and 'foreigners' in a differential way, but at the same time creating a relation between these two categories. She argues that punishing the 'illegal migrant' (through expulsion from the European borders) is a *de facto* recognition of her or his membership in a community, as the punishment installs the 'illegal migrant' as someone who is subjected to existing citizenship rules. Although the end result is negative, this already installs a first connection between these migrants and European citizenship.

Strictly related to the latter is a third EU challenge that has to do with efforts to build a European democratic polity. The democratic goal of including different citizens' voices in the European political arena often seems contradicted by technocratic practices that limit or exclude the participation of subjects other than experts or policy makers. This can reduce the opportunity that citizens have not only to propose new categories of rights, but also of effectively exercising the rights they are formally entitled to as European citizens, as a result perpetuating divisions within the EU between a formal and a substantive inclusion of its members. The EU technocratic approach can, as such, contribute to worsening the existing European 'democratic deficit', widening the distance between the Union and its citizens. Meanwhile, there is also some institutionalizing of dialogue with civil society. The EU institutions maintain relations with some Europe-wide organizations such as the EWL on gender equality matters or the European Network Against Racism on race equality. There have been experiments with creating temporary forums of civil society in the EU constitution-making process, such as in the production of the Charter of Fundamental Rights and of the Constitutional Treaty. However, there is an urgent need to improve the type of dialogue that occurs between institutional and civil society actors in the EU and the dynamics of interaction within the existing civil society forums (De Schutter, 2001).

A fourth EU challenge concerns the ongoing tension between a market Union and a social Union, a tension that is reflected in the denomination of the EU as a social market economy. Advocates of a social Union criticize the centrality of the market economy over people's quality of life in the EU. Research on neo-liberal interventions in non-Western contexts, which to some extent also apply to the EU context, shows that market-driven policies create a separation between sovereignty and citizenship (Ong, 2006). This is because the nation state's sovereignty to guarantee protection of citizens' entitlements is constrained by neo-liberal criteria. These criteria highly value mobile individuals with expertize, thus enabling them to exercise citizenship-like claims, whether they are formal citizen or not, whereas devaluing low-skilled individuals (both citizens and migrants) who lack marketable competences, thus exposing them to exclusion practices (Ong, 2006).

In addition to these four general challenges, we want to address one specifically gendered challenge for the EU. This has to do with how to 'gender' the European political debate, by introducing onto the EU agenda issues that tackle existing gender inequalities, and by doing so in all areas rather than only in relation to the labour market.

We argue that feminist debates and practices have something to offer the EU for facing the challenges we have listed above. In particular, considering both the form of feminist practices, conceived as an ongoing process of struggles, and the content of such struggles, as exemplified partially in the different feminist visions and debates, we regard feminist practices and debates as offering a fruitful contribution to the analysis and critique of EU citizenship and of the European integration project, benefiting not only the EU as such, but also its potential contribution to gender equality.[6]

With respect to the first EU challenge, as Jo Shaw (2000) argues, the feminist emphasis on change and the continuous challenging of concepts, structures, institutions, meanings, goals, and social relationships is particularly useful for analysing a constantly changing polity like the EU, especially when traditional concepts have failed in their interpretive attempts. In this sense, feminist practice interpreted as an ongoing struggle over the contested and evolving meaning of gender equality is particularly suitable for understanding the EU polity, whose borders, peoples, policies, concepts, and institutions are in a process of continuous change and adaptation. With particular reference to European citizenship, it is true that strictly interpreted, European citizenship as it now includes only a few minimal rights listed in the Articles 8–8e of the Treaty of EU. Broadly interpreted, however, EU citizenship has the potential to activate new social struggles, which constantly push for extensions of the existing range of rights and for different attributions of meaning to the concept of citizenship. Most recent scholarly debates on citizenship have highlighted the need to theorize the concept by taking into account the interplay between lived experiences and formal entitlements. Isin and Nielsen (2008), for instance, have explored the extension of the boundaries of belonging to a political community through the concept of 'acts of citizenship'. This approach implies a focus on those moments in which subjects constitute themselves as citizens, independently of their status of citizens (historical examples are Antigone or the Tank Man of Tiananmen Square). Similarly, Williams (2003) provides an account of a citizenship practice that pushed for extending citizenship rights and meanings in the EU by considering the intersections of gender, race, and class. This is the 1990s campaign of Black and migrant women within the EWL to advocate for the recognition of their experience of sexism and racism in the EU politics and in the EWL mobilization strategies. The campaign gave voice to Black and migrant women who acted as citizens in spite of their (lack of) status and challenged the position of the EWL by activating an internal discussion that moved the NGO to a

6 Some of the reflections that follow spill over into issues of governance, which can not be covered in this paper.

greater recognition of different women's experiences (Hoskyns, 1996; Williams, 2003). But it also contributed to the emergence of a discourse on race equality in the EU political arena that led to the development of an EU anti-discrimination policy, beginning with Article 13 of the Treaty of Amsterdam in 1997 and continuing with Directives 2000/43 and 2000/78.

The feminist commitment to achieving equality through valuing differences can be a lesson for the second EU challenge on the difficulties of integrating different identities in the European societies. This involves dealing with issues of 'embodied difference' within law, legal institutions and legal processes' (Shaw, 2000: 413), not only recognizing it but also considering it as an enriching and innovating element, cognizant of the risks of homogenization of different identities under one dominant culture. As Shaw points out, the advantage of such an approach is its long-term vision of difference as an expanding category. A feminist approach based on an understanding that women are positioned differently in relation to citizenship rights depending on their race, ethnicity, class, sexual orientation, age, disability, nationality, and other complex inequalities can make a significant contribution to the developing construction of a European citizenship (Lister, 1997). Migrants' mobilization all over Europe challenges a European citizenship that denies free movement rights, voting rights, or social rights to immigrant women and men, marginalizing them in different ways (Williams, 2003). In doing so, it criticizes the elitist bases upon which European citizenship is founded and opens the way to a reconsideration of the nature of the EU polity from being a Fortress Europe towards a more multicultural and (gender) equally inclusive Union.

Feminist analyses also contribute to the third challenge concerning the linking of issues of democracy, currently of high importance to European decision-makers, with the type of interrelation existing between women and men in a society as well as with broader issues of inclusion/exclusion. This is because the category of gender helps focus on the strict interdependence between the male and the female condition as part of a system in which the oppression of one sex can not be understood without looking at the domination of the other, and vice versa. As regards issues of exclusion, a focus on the interrelatedness of the two gender categories has the merit of pointing at the division within the EU between a formal and a substantive inclusion of its members. This is exemplified by the unequal recognition granted in the EU to the (predominantly feminized) unpaid work of care as compared to (predominantly masculinized) paid work, which then translates into gender inequalities in entitlements to social benefits and, as a result, in substantive inequalities in the enjoyment of social citizenship rights (Hantrais, 1995). The EU recognition of employment over care issues is exemplified by the predominantly labour market-related EU legal framework on gender equality, which is due to the EU remit in labour market areas. Even when care issues are addressed, such as in the Council directive on parental leave

96/34/EC, the focus is on reconciliation of work and family rather than on the promotion of an equal sharing of tasks between the sexes. This emphasis only on the organization of work, rather than also on questions of intimacy, perpetuates women's roles, and responsibilities as primary care givers, thus showing the EU's unequal recognition of care as compared to paid work (Lombardo and Meier, 2008). The intersection of race, class, and gender is relevant to this issue in at least two respects. One concerns the independent or derived nature of citizenship entitlements, and has to do with the fact that most migrant women depend on their spouses for enjoying citizenship rights in the member states. Another is the relation between the restrictive immigration laws present in most European countries and the employment-centred character of EU citizenship. These policies contribute to creating a situation, common to all member states, in which migrant women without working permits are usually pushed to work in the illegal economy, marginalized in the domestic and care sectors, or in the sex industry (Williams, 2003). Feminist debates on the issue of voice of non-hegemonic actors and in particular on the tension between expertize and democracy can also clarify the problems that the EU technocratic approach presents for democracy. Such a technocratic approach can exclude more controversial voices and issues from the political debate and agenda, thus depoliticizing the issue of gender equality by preventing the expression of alternative ways of framing policy problems and solutions. Feminist practices suggest models of cooperation between formal and informal levels of political action that challenge the EU to remove barriers between institutions and citizens and to create spaces for dialogue between the two groups of actors. The feminist commitment to opening a dialogue between citizens and institutions may indicate possible ways to solve the EU's 'democratic deficit'. Political experiences of the creation of 'velvet triangles' show that in fact expertize and democracy can coexist rather than conflict (Woodward, 2004).

Feminist reflections on the interdependence of public and private spheres and of productive and reproductive economies can contribute to challenging the centrality of the EU market economy versus people's quality of life. These reflections suggest the need for political action that would tackle public and private spheres together rather than separately. But they also suggest the adoption of a different system of priorities that would unsettle androcentric norms present in EU political institutions, for instance by replacing in the EU political agenda the centrality of money promoted by the market economy with the centrality of the quality of life and the perspective of standards of living fed by the economy of care and respect for the environment (Waring, 1988). These reflections expose the inequalities of European citizenship and of the EU as a whole, as a system that prioritizes what officially counts as economic wealth, that is the gross domestic product that results from the productive work predominantly performed by men, but undervalues and does not sufficiently

recognize the reproductive work of care necessary to live (and live well), that is predominantly performed by women. Focusing on the gendered character of work and on the system of attribution of values that is related to it can generate a reflection on the importance of changing existing social and political systems of attribution of norms, values, and resources by prioritizing people's quality of life and displacing the centrality of the market economy.

Finally, linking the challenge to the centrality of the EU market economy with what we called a 'specifically gendered challenge' helps to make more visible the ways in which feminist practices and debates can contribute to make the Union a polity that works towards gender equality. As concerns the challenge of how to gender the political debate, the feminist adoption of 'gender' as a central organizing principle of social reality has the effect of introducing into the EU substantive agenda a whole range of issues related to gender inequalities in the organization of labour, intimacy, and citizenship (e.g. care work, gender equality in politics, gender violence, equal pay, etc.). The adoption of a more comprehensive and intersectional approach to equality policies, as suggested in a number of feminist debates, pushes EU gender policy to move beyond a mere labour market focus to tackle inequalities in other areas. Different feminist visions of gender equality such as inclusion, reversal, and displacement, have already had a major impact on EU gender policies, as they have influenced the development of strategies such as equal opportunities, positive action, and gender mainstreaming, which appear to coexist in EU documents (Booth and Bennett, 2002; Walby, 2005).

In spite of their potential benefits for the EU, the extent to which feminist practices and debates can contribute to the question of EU citizenship is limited by a number of factors. These include the actual presence of feminist political actors within EU institutions, the nature of existing networks between institutional and civil society actors, and the ways in which official policy discourses are framed, in particular the extent to which they are receptive to and inclusive of feminist actors and discourses. Other limiting factors include the strategies of mobilization and the discourse of feminist movements within the EU arena, and contextual factors related to the EU and national socio-political situations in specific historical moments, which can open or close windows of opportunity for the incorporation of feminist perspectives in the European policy-making process.

More generally, the analysis of feminisms that we have developed in this paper has generated further reflection on the role of social movements, especially those directed at radical change, as developers of new ideas and strategies, from which institutions can learn to improve or redirect their policy making. Social movements, with their challenging practices and debates, are a source of continuous change and innovation for political institutions, and the latter can not but learn from an exchange with these movements. Part of the literature

reflecting on social movements, and feminist movements in particular, highlights the benefits of developing a fruitful 'culture of conflict' to confront and debate different competing concepts (Butler, 1993; Schmidt-Gleim and Verloo, 2003; Verloo, 2005; Blecher, 2006: 35). Yet, to benefit from the knowledge of strategies and ideas developed by social movements, political institutions such as the EU would need to create spaces or forums for these debates to take place, promoting a culture of 'productive antagonism' and exchange between different policy actors (Butler, 1993; Verloo, 2005; Blecher, 2006).

conclusions

We have discussed feminist debates and practices on citizenship in relation to both form and content. The former is interpreted as one which enables the expression of ongoing feminist political struggles that aim at transforming existing gender in/equality concepts, meanings, social structures, institutions, practices, and strategies that are periodically felt as unacceptable for the evolving agenda of the gender struggle or unequal towards particular subjects and positions. This form seems particularly appropriate to analyse a continuously evolving polity like the EU and to challenge the concept of EU citizenship both in terms of rights and substantive participation.

The content of feminist debates is extremely varied, and we have discussed a selection of debates over different visions of equality, the contested meaning of gender and other complex inequalities, the right to have a voice to express different issues, and the political division between private and public spheres. These challenge the EU to place gender equality and other inequalities on the agenda, to adopt a global approach that can deal with inequality in areas beyond the labour market, to implement strategies such as equal opportunities, positive action, and gender mainstreaming. They focus on the interdependence between reproductive and productive spheres, challenging androcentric norms that are operating in EU institutions, questioning the lack of democracy of EU technocratic methods, and suggesting policy discourses and practices which are more inclusive of different 'non-hegemonic counter-publics' (Fraser, 1989).

The EU polity and citizenship are confronted with a number of challenges. For some of the EU challenges that we have highlighted, such as the existence of changing political dynamics, the need to integrate different identities, to democratize the polity, to give centrality to people's quality of life versus the market economy, acknowledging the fact that they are gendered is not sufficient to solve the problem. However, these challenges certainly could benefit from tools and strategies that feminist politics has devised. Other challenges, though, can only be solved if they are recognized as truly gendered challenges, as in the case of the gendering of the EU political agenda.

The interaction of feminist practices and European citizenship is itself a process of continuous transformation. Feminist practices and debates continuously challenge the EU project with different, provisional, transformative struggles that at the same time challenge the movement itself. The mobilization of Black, minority ethnic and migrant women in Europe in the 1990s has both challenged the elitist project of a Fortress Europe, and at the same time challenged the internal resistance of the feminist movement to overcome a tendency to homogeneization and to give visibility and voice to different women's experiences. Beyond the limits of 'identity politics' lies what Nira Yuval-Davis (1997) calls 'transversal politics', where 'perceived unity and homogeneity are replaced by dialogues which give recognition to the specific positionings of those who participate in them as well as to the 'unfinished knowledge that each such situated positionings can offer' (Yuval-Davis, 1997: 131).

EU institutions can opt or not to keep the European project open to continuous criticism and reconstruction, taking on the challenges presented by feminists and social movements, engaging in debates with their citizens and creating spaces for the articulation of their voices. Although at times it can create difficulties both for the movement and for the institutions, the awareness of the ongoing provisional character of all (feminist) positions opens up continuous possibilities of reconstruction, and, for this reason, as Blecher (2006: 190) rightly states, 'it remains a precious element of the movements, because it is precisely this continuous awareness of basic inadequacy and undecidability which keeps (other/better) world(s) possible'.

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