in her own culture as limiting and abhorrent. Only the world of ritual as she defines it holds this power. The "bizarre" rituals of Anglo-American culture are for her the norm. The power invested in Anglo-American class structures is less evident to her than the power invested in the patriarchy in those ritualized belief systems that she rejects.

Promises We Should All Keep in Common Cause

ABDULLAHI AN-NA'IM

Theorizing of the kind reflected in Susan Okin's essay (or Samuel Huntington's *Clash of Civilizations*) sometimes influences public policy and thereby affects the lives of individuals and communities. Moreover, such influence often extends beyond, and sometimes contradicts, a theorist's own intentions. Beginning from these premises, I wish to raise two sets of questions about Okin's argument and outlook.

First, can liberal theorists deliver on the promises they make to members of cultural minorities within what Okin calls "Western liberal cultures"? Do such theorists in North America and Western Europe have a clear understanding of the meaning of cultural membership in a minority culture in Western societies, as a daily existential experience and not merely a theoretical construct? And are they willing and able to act in solidarity with minority groups in advancing the objectives those communities now hope to achieve through assertions of group rights? In particular, if they encourage young women to repudiate the integrity and cohesion of their own minority culture, how can the theorists then help to sustain the identity and human dignity of those women?

Second, are liberal theorists concerned about the wider implications of their thinking even for their own official agenda—let alone other equally important issues—at home or elsewhere in the world? For example, will the solution Okin is proposing for Western countries be resented as hegemonic imposition, whether among minorities in the West or in non-Western societies, thereby becoming counterproductive for gender equality in practice? What are the likely
consequences of her approach on the dynamic of the human rights movement at large?

In raising these issues, my frame of reference is the system of international human rights standards, rather than the cultural norms of the majority, as reflected in its conceptual and legal order, social and political institutions, and public discourse. I rely on human rights as a shared frame of reference because the alternative would be cultural hegemony at home and imperialism abroad. Most generally, then, my question is: What are the implications of an exclusive focus on gender issues for other human rights standards throughout the world?

I agree with Okin’s view that nearly all cultures discriminate against women—especially many of the minority cultures on whose behalf claims of group rights are being made in Western societies. I also share her commitment to the elimination of all forms of discrimination against women and girls everywhere as a human rights imperative. The main difference between our positions pertains to the possibility of comprehensive strategies for the protection of all human rights throughout the world. What I emphasize is that, in seeking to eliminate discrimination on grounds of sex, one should avoid encouraging discrimination on grounds of race, religion, language, or national origin.

For example, Okin’s analysis makes no reference to economic and social rights (such as the right to an adequate standard of living and education) although these concerns constitute much of the rationale of group rights. This omission is particularly significant because failure to accept these as human rights is a clear indication of liberal “cultural relativism” in the wider debate about the universality of human rights.

Moreover, while citing examples of discrimination against women and girls from various parts of the world, Okin does not seem to be concerned with the resolution of those problems in non-Western societies. I am therefore wondering whether her proposed solution for the elimination of gender discrimination within minority cultures in the West is detrimental to the achievement of this objective itself globally, let alone to the realization of a more comprehensive view of human rights everywhere.

Okin says that she prefers that a minority culture be “encouraged to alter itself so as to reinforce the equality of women—at least to the degree to which this value is upheld in the majority culture,” rather than “become extinct (so that its members would become integrated into the less sexist surrounding culture).” The sense of ultimatum is of course clear even in her preferred solution. Minority cultures are told: either change to achieve gender equality in the private lives of your families and communal affairs, or perish. But Okin does not offer any comment on the implications of cultural extinction for members of minority cultures. Moreover, it is interesting to note that Okin is willing to accept the degree of gender equality upheld by the majority culture. Whereas the minority culture faces an ultimatum in meeting the standard set by the majority culture, the latter can take its own time in achieving gender equality at the level set by international human rights norms, if ever.

I am not suggesting, of course, that either minority or majority should be allowed to practice gender discrimination, or violate some other human right, because they believe their culture mandates it. In particular, I emphasize that all women’s rights advocates must continue to scrutinize and criticize gender discrimination anywhere in the world, and not only in Western societies. But this objective must be pursued in ways that foster the protection of all human rights, and with sensitivity and respect for the identity and dignity of all human beings everywhere.

In other words, I say that all cultures must be held to the same standards not only of gender equality but also of all other human rights. While gender equality is a serious problem in some minority cultures in the United States, for example, racism and economic and social rights are large problems for the majority culture. So American human rights advocates should be equally concerned with all human rights issues that are problematic in their own situation, though some of them may have one particular focus or another for practical reasons. Only by engaging in such an “internal discourse” can American human rights advocates gain the moral credibility
required to encourage such discourse elsewhere. This in turn will generate "cross-cultural dialogue" to promote consensus on truly universal human rights norms and their principled and sustainable implementation throughout the world. I am also suggesting that compliance with human rights standards cannot be achieved in a principled and sustainable manner except through the internal dynamics of the culture concerned. For that to happen, the argument for gender equality has to be made within the frame of reference of minority culture, and for economic rights within the framework of liberal Western cultures. The persistence of gross structural, as well as social, racism in the United States should clearly indicate the difficulty of achieving the type and degree of cultural transformation necessary for the effective implementation of a universally accepted human rights norm. It would also be both salutary and instructive for liberal intellectuals to try to "encourage their own culture to alter itself" in order to accept and implement economic and social rights as human rights.

I suggested earlier that human rights must be the commonly agreed frame of reference for debate. Some people are tempted to say that economic and social "claims," such as health care or housing, are not "really" human rights. But how would they respond in the face of a similar denial of human rights standing for gender equality? Whatever grounds exist for human rights standing for the one apply to the other. This does not leave the issue to arbitrary assertions and claims. Rather, the task is to provide specific criteria and a process for balancing different values. So, what are human rights, and how are they established or ascertained?

Intuitively, human rights are claims we make for the protection of our vital interests in bodily integrity, material well-being, and human dignity. To secure respect for our rights, we must concede the right of others to make similar claims for the protection of their vital interests. Practically speaking, the normative content of human rights has been established by international treaties negotiated and adopted by governments within the framework of the United Nations and regional intergovernmental organizations.

Both intuitively and practically, group rights are human rights, at least under the rubric of the right of "peoples" (not states or nations) to self-determination, as provided for in the first article of both the International Covenant on Economics, Social and Cultural Rights and the International Covenant on Civil and Political Rights. To be sure, self-determination is commonly understood to refer to political independence for formerly colonized people. But now that that objective has been achieved, attention must be given to "internal" self-determination as the ultimate goal and rationale of political independence everywhere.

According to the first article of the two covenants, self-determination means that a people "freely determine their political status and freely pursue their economic, social and cultural development"; and "freely dispose of their natural wealth and resources. . . ." For a people (which can mean a cultural minority) to exercise these rights, the members must be able to act collectively as a community, rather than simply as individual "citizens" of a country. At the same time, since the two covenants and other instruments also (actually primarily) protect individual rights, it is not a question of choice between individual and group rights. Rather, it is a matter of mediation of conflicts between individual and group rights, as well as within each set of rights.

As Okin has clearly shown in the case of gender equality, group and individual rights can conflict. There are also the usual questions about agency and representation when claims are being made on behalf of corporate entities. But this simply means that the concept and precise content of group rights need to be clarified and mediated in relation to other rights and concerns. After all, there are conflicts between different individual rights, as can be seen in debates about the scope of freedom of expression in relation to "hate speech." Long-standing civil rights, even within such a highly developed domestic constitutional order as that of the United States, are constantly renegotiated among competing constituencies, as can be seen in the case of abortion or affirmative action. Yet no one would suggest abolishing the underlying rights because of problems with their scope and implementation.
In conclusion, I would also note that "uniculturalism" has its own problems, for women and men, girls and boys, as individuals and communities. So, unless we can actually deliver on the promises we made when raising skeptical doubts about multiculturalism, we should work to maximize its benefits and reduce, if not eliminate, its disadvantages. Instead of repudiating multiculturalism because it risks persistent gender inequality, let us work within minority cultures for the internal transformations outlined earlier.

**Susan Okin's primary claim, that there is a deep tension between feminism and multiculturalism, seems unambiguously correct. While multiculturalism celebrates the diversity of cultures, including necessarily the diversity of gender roles that preoccupy these cultures, the enterprise of feminism is dedicated precisely to constraining the available repertory of such roles. By inviting us carefully to focus on this tension, Okin's article usefully exposes ambiguities in our concepts of both feminism and liberal multiculturalism.**

Okin defines feminism as the "belief that women should not be disadvantaged by their sex, that they should be recognized as having human dignity equal to that of men, and that they should have the opportunity to live as fulfilling and as freely chosen lives as men can." This definition is certainly attractive, for such values as "dignity" and "freedom" seem incontrovably desirable. Yet Okin's confrontation with multiculturalism puts this definition under considerable pressure. Take, for example, the culture of Orthodox Ashkenazi Judaism, which possesses strongly distinct and patriarchal gender roles. The culture disqualifies women from important religious rituals, and it assigns them primary responsibility for the care of the home and children.

If we assume that these distinct gender roles do not violate any legal rules prohibiting sexual discrimination, and that these roles are (perhaps counterfactually) entirely confined to what Okin calls "the private sphere," we may ask whether Okin would nevertheless object to endowing this culture with what Will Kymlicka calls "external protections." External protections, while not using the force