

## **Introduction to Analysis the Compatibility between Women's Rights in Islamic Law and International Human Rights**

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### **Abstract**

International Human rights, especially women rights, in today's world is one of the main challenges of the Islamic world with International Law. In fact, one of the great allegation against Islam is about the violation of women rights in Islamic law. This is while in Islam, Human – even man or woman- is considered equal by specification of the verses of the Qur'an like "Surely the most noble of you in the sight of Allah is the most righteous among you" (al-hujurat/13). Islam however also recognizes that such equality does not mean that men and women are the same. It notes their different physical and emotional strengths and in view of this sets out their key roles in life. In this framework, the purpose of this article is to assess the misinterpretations of international women rights about some Islamic views toward women rights. This article's objective is to highlight connections between the basic tenets of the United Nations Convention on the Elimination of All Forms of Discrimination Against Women and the nature of Islam-based reservations. Also, it assess the question of the compatibility of the Sharia with modern international human rights law. Because it is a subject of enormous complexity and variation, detailed examination is restricted to two highly contentious subjects of Islamic family law – polygamy and the Divorce within Islam. The results show that the dispute between Islam and the West over human rights is not a conflict in dialectics but of perspectives, So that Islamic doctrines are compatible with modern norms regarding human rights. Likewise, the divergence between these two worlds are not fundamental clash, but actually the disagreement can be viewed as a cultural dialogue.

### **Keywords**

Human Rights, Islamic Law, International Human Rights, Convention on the Elimination of All Forms of Discrimination Against Women, Women rights.

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### **Introduction**

In many different cultures, a large number of women are routinely denied their basic human rights, and are often subjected to discrimination, demeaning treatment, physical abuse sometimes resulting in mutilation or murder and routine psychological abuse because they are women. Equally, this situation, which would not be tolerated if it impacted so widely and adversely on any other social group, has not been adequately addressed because the victims are women. (Bunch, 1990, p.486) This can be seen in the workings of international treaty bodies such as the United Nations. This organization has acknowledged that many women are in positions where their rights and opportunities are severely limited. (Defeis, 2011, p.398) However, many of its efforts to address these issues have lacked force and have had little impact. The major international statement about women's rights was the United Nations Declaration for Women, passed in 1967. This declaration was intended to establish clear principles regarding equal treatment for women, rather than addressing certain specific problems that had attracted the interest of the international community. The Declaration triggered a chain of events causing the evolution of the Convention for the Elimination of All Forms of Discrimination Against Women, which was drafted and submitted to the General Assembly of the United Nations 1979. The Women's Convention, which has been described as the 'definitive international legal instrument requiring respect for the observance of the human rights of women', (Cook, 1990, p.643) quickly entered into force. The majority of states ratified the Women's Convention, however, a proportionally small number came from states which can be classified as Islamic states. Furthermore, those Islamic states that signed the Convention entered wide ranging reservations regarding some of the major substantive provisions in the treaty, using Sharia as the basis for justifying the continued subjection of women. In other words, a common factor among many Islamic countries' reservations regarding the Women's Convention was the perception that certain of its key provisions conflicted with some basic tenets of Islamic law.

The aim of this Article is to look at both Sharia and the Women's Convention to analyze if the alleged incompatibility between their provisions actually exists, or if the alleged conflict is a fallacy advocated for political purposes. The analysis also serve to identify the nature and extent of the divide between Islamic law and international human rights standards as perceived by the treaty bodies and to show the possibility for accommodation in those areas in which there appears to be conflict. It also focuses on those aspects of Islamic Sharia that relate to Islamic family law,

and assesses the question of compatibility of the Sharia with modern international human rights law. As this is a subject of enormous complexity and variation, detailed examination is restricted to two highly contentious subjects of Islamic family law; polygamy and divorce within Islam.

### **1. Historical Background: Women's Rights in International Human Rights**

Adopted by the United Nation in 1979, The Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) is the only major human rights treaty which exclusively addresses women's rights. It is a wide-ranging, comprehensive treaty that seeks to promote women's rights in all walks of life, including not only civil and political rights but also social, culture, and economic rights<sup>i</sup>. CEDAW is a milestone achievement for international women's rights in that it seeks to end gender discrimination not only in the public sphere but also in the private spheres of family, culture, and religion.<sup>ii</sup> Article 2 of CEDAW calls for states to 'eliminate discrimination against women by any person, organization, or enterprise: and to take all appropriate measures, including legislation, to modify or abolish existing laws, regulations, customs and practices which constitute discrimination against women.'

However, CEDAW's ambition to eradicate private as well as public discrimination has also been its downfall. CEDAW has the dubious distinction of being both one of the most ratified conventions in international law (as in 2015, 189 countries had ratified CEDAW)<sup>iii</sup>, while also having the highest number of states expressing 'reservations' to the agreement. Some of the most damning of the reservations are those that reject CEDAW's obligations where they would interfere with religious and customary law. Some Islamic states such as Bahrain, Bangladesh, Iraq, Malaysia, Oman, Saudi Arabia, and Syria, for example, do not consider Article 2 binding if its requirements conflict with Sharia laws based on the Qur'an. Nearly a dozen Muslim states have objected to Article 16, which requires state parties to 'eliminate discrimination against women in all matters relating to marriage and family relations.' Thus, despite CEDAW's call to recognize women and men as equals in marriage, with 'the same right to enter into marriage,' the 'same right freely to choose a spouse and to enter into marriage only with their free and full consent,' and the 'same rights and responsibilities during marriage and its dissolution', some Muslim states have avoided meeting these obligations, arguing that they conflict with Sharia law<sup>iv</sup>.

The CEDAW Committee has stated that Articles 2 and 16 are core provisions of the Convention, and the committee has expressed concern about the wide number of reservations to these provision. But complains by some CEDAW member states that these reservations are illegal under

international law because they undermine the ‘object and purpose’ of the treaty have been met with accusations of cultural imperialism and religious intolerance.<sup>v</sup> The upshot has been that countries have successfully resisted having to fully implement CEDAW on the grounds that religion and culture make them exceptions to certain parts of it. Thus, although very few countries have yet to ratify CEDAW (including Iran, Qatar, Nauru, Somalia and Sudan), many of its key provisions are not enforced in many Muslim states.

Article 16 of the Convention on rights and duties of spouses has attracted many reservations from Muslim State parties, on the grounds that any law dealing with personal issues must conform to the principles of Islamic law relating to personal status. An example of this is a report made to CEDAW from Morocco. In this report it was stated that, having taken advice from different women’s organizations, the government in Morocco had decided to amend some aspects of its personal status code in order to conform to standards established in international agreements. However, this had to be done so that the code ‘maintained its respect for the principles of Islamic law, the Sharia’.<sup>vi</sup> The report recognized that; ‘there were still a number of barriers preventing women from exercising and enjoying their human rights and participating fully in the socioeconomic development of the country’ but emphasized the ‘Government's willingness to pursue the task of eliminating all such obstacles.’<sup>vii</sup> This would suggest that there is potential for accommodation between international human rights law, with its emphasis on universalism, and Islamic law as practiced in Muslim states, and that this accommodation should be supported.

In relation to gender equality, some of the specific issues of contention between Muslim States and international human rights treaty bodies in the discussion of their reports have included polygamy and divorce. These are now considered below.

## **2. Women’s Rights in Islamic Law and International Human Rights**

In Islam, Human – even man or woman- is considered equal by specification of the verses of the Qur'an like” Surely the most noble of you in the sight of Allah is the most righteous among you” (al-hujurat/13). Islam however also recognizes that such equality does not mean that men and women are the same. It notes their different physical and emotional strengths and in view of this sets out their key roles in life. The roles are therefore not a question of superiority or inferiority, but a question of natural capacity and proper functioning. Nevertheless, International Human rights, especially women rights, in today's world is one of the main challenges of the Islamic world with International Law. In fact, one of the great allegation against Islam is

about the violation of women rights in Islamic law. The purpose of this article is to assess the misinterpretations of international women rights about some Islamic views toward women rights. But because it is a subject of enormous complexity and variation, in the following detailed examination is restricted to two highly contentious subjects of Islamic family law – polygamy and the Divorce within Islam.

### **2-1. Case Study: Polygamy**

Polygamy is permitted under Islamic law under certain conditions (Quran 4 (3)) and is legal in most Muslim states under codes of personal law. However, in General Comment 28 of the HRC, it is stated that, according to the ICCPR, polygamy constitutes a violation of the equality of rights in marriage. It further states that; ‘it should be definitely abolished wherever it continues to exist.’<sup>viii</sup> Furthermore, the CEDAW Committee observed in its General Recommendation 21 that: ‘Polygamous marriage contravenes a woman's right to equality with men, and can have such serious emotional and financial consequences for her and her dependents that such marriages ought to be discouraged and prohibited.’ The question of polygamy has thus been an issue in the discussions of conflict between many Muslim States and the treaty bodies.

Tunisia is to date the only Muslim state to have addressed this issued directly. In 1956 a Code of Personal Statutes<sup>ix</sup> was introduced. Article 18 of this Statute declared that; ‘Polygamy is forbidden. Any person who having entered into a bond of marriage contracts another marriage before the dissolution of the preceding one, is liable to one year’s imprisonment or to a fine...’. This reform was welcomed by CEDAW as; ‘a shining example for other countries, because of its progressive and programmatic interpretation of Islam.’ (Concluding Observations of the CEDAW Committee, 1995, paras. 249-250 (Tunisia)).

However, Other Muslim states, even the more progressive ones such as Algeria have not followed Tunisia’s example. An Algerian representative speaking during a discussion of an Algerian report to ICESR commented that “In the view of Muslims, Sharia law could not be altered by any Islamic State or by any international committee or covenant. The fact that Tunisia had changed its laws was a matter for Tunisia and had no consequences for other Islamic States. The Committee must understand that, when discussing Sharia law as application to family law matters, it was treading on delicate ground and that criticisms of Islam could only lead to recriminations.” (Concluding Observations of the CEDAW Committee, 1995, para. 51) The religious basis of the main arguments in favour of polygamy was also made explicit in a Nigerian deposition to the Human Rights Committee. It was

argued that the fact of traditional religious customs and practices meant that ‘the provisions of the Covenant [ICCPR] should be viewed in the light of realities.’ (Review of the Periodic Report of Nigeria, 1996, para.20) In addition, it was stated that it is ‘precisely in the light of religious practice that a man's right to have one or several wives must be considered.’ The Nigerian representative may have expressed a common concern among Muslim states regarding the Western secular basis of human rights law when he asked whether; ‘the authors of the Covenant envisaged a world without religion, in which no religious precept would be respected.’ (Review of the Periodic Report of Nigeria, 1996, para.20)

The position of the ESCR Committee remained clear and explicit: ‘States that ratified the Covenant were legally bound to abide by it and could not invoke reasons - whether constitutional, legislative or religious - for failing to do so.’ (Concluding Observation: Algeria, 1996, para. 60). However, the practice of polygamy in Muslim states under Islamic law varies. In a statement to the ESCR Committee, Egypt asserted that as polygamy could not be abolished as it is sanctioned under Islamic law. (States parties to the Covenant and Status of Submission of Reports: Initial and second periodic reports, 2001, para. 12)<sup>x</sup> However, it was added that in practice fewer than one percent of marriages were polygamous, largely due to economic pressures and changing social values. It was further pointed out that a man could not enter a polygamous marriage unless the women involved consented to the relationship, and that if a husband wished to take a second wife, the first wife would have to be informed, and that she would also have the right to divorce the husband on these grounds. In this way, restricting the conditions under which practices which are in breach of international human rights law are permitted in Muslim states can be seen as a way to try to strike a workable compromise between international obligations regarding the marriage rights of women, and a social practice (polygamy) which is explicitly sanctioned in the Qur’an.<sup>xi</sup>

It should be also noted, there are normally alternative routes to redress situations of inequality or disadvantage which could also lead to a smooth harmonization of the conflict in the area between Islamic law and international human rights law, One of these is by raising the rights of victims of the inequality, known as ‘equalizing up’. (Baderin, 2007, p. 142). There is consensus in Islamic law that polygamy can neither be imposed upon a woman or a man, it is only a permissible act. Also, most of the schools of Islamic jurisprudence, except the Sharia, endorse the doctrine of ‘suspended repudiation’ and ‘delegated repudiation’. According to the doctrine of ‘suspended repudiation’, the husband stipulates at the time of

marriage that the marriage becomes repudiated if he does certain things which are unfavourable to the wife, which may include taking another wife. By the doctrine of 'delegated repudiation' the wife is vested, by the husband, during the marriage contract with the right to divorce herself should there arise circumstances unfavourable to her, which may include taking another wife by the husband. It is possible therefore for Muslim countries, for reasons of public welfare, to ensure that women should be specifically informed of these rights during the marriage contract. They would then have the discretion either to exercise these rights or not. As a result, the state would have legally activated the relevant rights of women within Islamic law and 'equalized up' their formerly available but suppressed rights against the rights of men regarding polygamy. (Baderin, 2007, p. 142-144) This would give them a choice in the matter. In addition to this, women should also be adequately educated of the existence of such rights to them in law. The importance of educating Muslim women about their rights in Islamic law is manifested in the observation of Fyzee that: "The unfortunate position of...Muslim women... is due to the fact that women being illiterate are ignorant of their rights, and men being callous choose to remain ignorant." (Fyzee, 1936, p.238) Also Coulson confirmed this by stating: "The customary seclusion of women, and especially the lack of educational facilities, left them ignorant of their rights and unable to insist upon the proper use of machinery which the law had provided for their protection." (Coulson, 1964, p. 207). Any disadvantage of polygamy could thus be redressed by women utilizing an alternative legal right available to them within Islamic law, while at the same time the liberty of women who may still like to be co-wives, when exceptional circumstances so demand, would still be guaranteed without interference or prohibition from the law. Neither monogamy nor polygamy would then be an imposition upon men and women, but would actually be put in their correct perspectives under Islamic law as matter of choice. This would not contravene the Sharia and would also indirectly satisfy the obligations of the Muslim States to ensure equality of rights in marriage. This way to focus on international human rights would be seen to concentrate specifically on human rights and not on questioning the basis of religious teaching per se. This could therefore promote a complementary approach to solving human rights problems in regard to areas of conflict with Islam.<sup>xii</sup>

## **2-2. Case Study: Divorce**

Traditionally, the husband has the advantage of 'Unilateral Repudiation' (Divorce) over the wife in the procedure of marriage dissolution under

Islamic law. (Esposito, 1982, p. 28). The wife's right to dissolve the marriage is only through either 'Self-Redemption' (Khul'u), 'Mutual Bilateral Agreement' with the husband (Mubira'ah) or by 'Judicial Order' (Faskh) on specific legal grounds. (Esposito, 1982, p. 28) Article 16(1)(c) of the CEDAW however provides that States 'shall ensure, on a basis of equality of men and women' that couples enjoy 'the same rights and responsibilities during a marriage as at its dissolution' and this can be viewed as one of the biggest obstacles in attempting to reconcile the 1979 Convention with Sharia, as it is implemented in practice.

Some states have entered vague, sweeping reservations that indicate that they would not observe the terms of the convention in any areas where its provisions conflicted with Islamic law, without specifying exactly what deviations from the convention this would entail.<sup>xiii</sup> The Islamic reservations have attracted critical attention and censure on the part of activists and organizations supportive of women's equality. Many parties to the convention have officially recorded strong objections to such reservations, complaining that they are incompatible with the object and purpose of the Convention, and those Muslim countries making such reservations effectively retaining discretion to decide when Islamic law precludes respect for the Convention. For example, Bangladesh simply stated that the provisions of CEDAW Article 16 were objectionable because they were in conflict with Sharia law.<sup>xiv</sup>

However, in ways which parallel the approaches to polygamy discussed above, some Muslim states have sought ways to improve the human rights of women regarding divorce, seeking solutions that are compatible with the principles of Islamic law and which conform to international human rights treaty obligations. These efforts however have been mediated by the risk of potential popular opposition against reforms in this area, forcing governments to focus only what is permissible within Islamic Sharia.

An example of this can be seen in Indonesia. Under article 38 of the Indonesian Law of Marriage (1947); 'A divorce shall be effected only in the court and the court shall not permit a divorce before attempting reconciliation between the parties. Divorce shall be permissible only for sufficient reasons indicating breakdown of marriage.' These reforms to divorce law are possible under an 'enlightened interpretation of the Islamic Sharia' which is operating in the interests of society as a whole. In this way it can be seen that even in the most contentious areas of dispute between international human rights treaty obligations and perceived duties under Islamic law, such as the seeming incompatibility between women's marriage



rights and the requirement to uphold the sanctity of Qur'anic teaching on conditional divorce, there is potential for accommodation. In Egypt, divorce law has been amended family law in order to extend women's personal rights within the context of Islamic personal law. The result is that in Egypt, 'a woman could apply for divorce and, if there was no reconciliation within a stipulated period of time the divorce would be granted on condition that the woman renounced all personal financial rights resulting from the marriage.' (Egyptian Personal Status, 2000, Article 10 (b)). In addition, the Egyptian representative to the ESCR Committee further stated that 'the new law on divorce was an example of the new or enlightened interpretation of the Islamic sharia that had emerged from recent debates' and that '(e)lements of the sharia had been used to give legitimacy to the new divorce regulations, showing that the social system could be modernized without discarding religious tradition'.<sup>xv</sup> Therefore, only a superficial view of Islamic law or very restrictive interpretation of its sources gives an impression of total deadlock between Islamic and international human rights law on the issues of gender equality.

### **Conclusion**

The examples discussed above are indicative of the different approaches of Muslim states to the main areas of conflict between international human rights law and the practice of the principles of Islamic law. It is shown that some Muslim states which operate under Sharia law may employ arguments of cultural relativism to justify their attitudes towards the legal status of women under family law. Although they Islamic law and international human rights law may appear to be fundamentally incompatible in this area, there have been moves towards a more accommodating stance by many Muslim state parties. The importance of international human rights law has been recognized, leading to a less confrontational style that has promoted cautious reforms in the area of family law affecting women's rights in some states. This has in part lessened the disparity between international treaty obligations and duties as expressed in Islamic law. Similarly, there have been moves by international treaty bodies towards recognizing and understanding some of the arguments of Islamic jurists, to the extent that these opinions have been used to oppose the uncompromising stances of some Muslim states on some issues. (Baderin, 2001, p.301). On the other hand, if international human rights treaties cannot succeed in resolving the conflict between women's rights in Muslim states and religious rights, as human rights treaties are often the result of political compromises, there could be a suggested strategy which would improve the situation and being

more of a long-term solution. While discussing Sharia and international human rights standards, Abdullah An-Na'im has argued that in the search for compatibility between Islamic legal theory and the Western standards of international human rights, the West should not expect "Muslim peoples to examine and re-evaluate their cultural and philosophical stance... unless the developed countries are willing to examine and re-evaluate their own cultural traditions." (An-Na'im, 1990, p. 49). With all due respect to this noted commentator, it has been suggested that there is no need for the West to re-examine its cultural traditions, so as to seek compatibility between international human rights standards and the Qur'an and Sunnah. An-Na'im's stance is based on the presumption that one cannot expect a seventh century Middle Eastern concept to accommodate an ideal which has its origins in eighteenth century Europe and North America, he believe that 'not only can Sharia accommodate and effectively implement international human rights standards, but the principles upon which Sharia is based, are entirely consistent with international human rights standards.' (An-Na'im, 1987, p. 14). It is universally accepted in Islamic circles, that the verses in the Qur'an were revealed as the needs for them arose in that particular society. Thus the verses on polygamy were revealed after the Battle of Uhud, when there were many widows and orphans who needed the protection a marriage could offer them. Therefore, it is suggested that those Qur'anic verses which deal with social circumstances were revealed and applicable only to that society. (Johnson, 2005, p.567) In addition to this, the Qur'an repeatedly states that an individual cannot be excused for accepting an interpretation of the Qur'an handed down by previous generations without first contemplating it.<sup>xvi</sup> (Quran 6 (164), 77 (15)). This means that each individual must interpret the verses in the Qur'an on society, according to their own way of thinking, i.e. reflecting their own sociological conditions. Although this may seem radical, it does not in fact depart from the practices of some states and individuals in the past. Historically, this is exactly what the Ulama of all previous generations have done. Also staunch advocates of supposedly authentic Sharia, such as Saudi-Arabia have accepted that slavery has no place in modern society.<sup>xvii</sup> Therefore since the Saudi's could only ratify the Convention on the Abolition of Slavery, by believing in the abrogation of the Qur'anic verses on slavery, other states could abrogate the verses which discriminate against women. It is also quite clear, that at the time the Prophet Mohammed received the Qur'an, the intention was to guarantee women certain minimum rights and not to award them equality on a par with men, because at that time, this was all that society could accommodate. (Johnson, 2005, p.567) The problem now is that some of the

recorded Hadith which reflected the sociological conditions prevalent then, have been wrongly equated with theological injunctions applicable to all eras, even when the sociological conditions upon which these injunctions were based have changed.<sup>xviii</sup> But the general principles in the Qur'an: tolerance, autonomy, justice, freedom, consultation and equality, (Quran 34(15)) upon which much of this reasoning was based, are in fact very similar to the principles upon which international human rights standards are based. Although one cannot expect Muslims to change their position overnight, a change in attitudes, and a mass realization that Qur'anic verses reflect the social conditions in which they were revealed.<sup>xix</sup> For this to occur, one must apply the principles upon which Qur'anic injunctions are based to the modern era, rather than the literal word of the Qur'an. This change in attitudes, however, is one which must be advocated by Muslims to Muslims, otherwise the most reactionary element of the Islamic world will rebel totally. At least Muslims advocating such a stance stand some chance of being listened to, and although it may seem that at the moment the prospects of success are slim, given time, it can be believed that this will prove to be the way to resolve the commonly perceived conflict between Sharia and international human rights standards.<sup>xx</sup>

### Notes

- i. United Nations Convention on the Elimination of All Forms of Discrimination Against Women 1979, e.g. Article 1.
- ii. Ibid. e.g. Article 16.
- iii. United Nations, 'Ratification Status of International Human Rights Treaties' (1 May 2015) [Online] Available at: <<http://www.ohchr.org/Documents/HRBodies/HRChart.xls>>.
- iv. United Nations, *Multilateral Treaties Deposited with the Secretary General* (ST/LEG/SER.E/26, 2009) 290 (Kuwait).
- v. Committee on the Elimination of Discrimination against Women, *General Recommendation No 20: Reservation to the Convention* (GAOR 47<sup>th</sup> Session Supp 37, 1992) 7.
- vi. United Nation, Concluding Observations of the CEDAW Committee (UN Doc. A/52/38/Rev.1, 1997) para. 46 (Morocco).
- vii. Ibid. paras. 49-50.
- viii. Ibid. para. 27.
- ix. Tunisian Code of Personal Statutes (decree of 13 August 1956, amended by Law No. 59-77 of 19 June 1959).
- x. Committee on Economic, Social and Cultural Rights, *States parties to the Covenant and Status of Submission of Reports: Initial and second periodic reports* (UN Doc. E/C.12/2000/SR.12, 2001) para. 12 (Egypt).
- xi. e.g., Iraqi Code of Personal Status (Law No. 188/1959 as amended by Act No. 11/1963 and Act No. 21/1978), Article 3(2).
- xii. Mashood A. Baderin, *International Human Rights and Islamic Law* (Oxford university Press, Oxford 2007) 142-144
- xiii. United Nations, *Multilateral Treaties Deposited with the Secretary General* (ST/LEG/SER.E/26, 2009) 287 (Bangladesh).
- xiv. United Nations, *Multilateral Treaties Deposited with the Secretary General* (ST/LEG/SER.E/26, 2009) 287 (Bangladesh).
- xv. Committee on Economic, Social and Cultural Rights, *States parties to the Covenant and Status of Submission of Reports: Initial and second periodic reports* (UN Doc. E/C.12/2000/SR.12, 2001) para. 64 (Egypt).
- xvi. Quran 6 (164), 77 (15).
- xvii. The Saudis have shown their support for the abolition of slavery by ratifying the Slavery Convention, (as amended by Protocol of Dec. 7, 1953, 212 U.N.T.S. 717 and 182 U.N.T.S. 51, September 25 of 1926). In addition, the Saudis have also ratified the Supplementary Convention on the Abolition of Slavery, the Slave Trade and Institutions and Practices Similar to Slavery (226 U.N.T.S. 3, September 7 of 1956).
- xviii. Joelle Entelis, 'International Human Rights: Islam's Friend or Foe - Algeria as an Example of the Compatibility of International Human Rights Regarding Women's Equality and Islamic Law' (1997) 20 *Fordham Int'l L.J.* 1251, 1253-1254.

- xix. Urfan Khaliq, 'Beyond the Veil?: An Analysis of the Provisions of the *Women's Convention*' (1996) 2 *Buff. J. Int'l L.* 1, 45-47.
- xx. *Ibid.*

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