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Feminist Historiography and the French Welfare State: A Comparative Perspective

Karen Offen

Résumé

Cette contribution propose une analyse d'un point de vue féministe des conclusions auxquelles ont abouti certaines études récentes sur l'histoire de l'Etat providence français. L'auteure insiste sur l'importance des questions de protection de la maternité et de politique de la population pour le débat sur la place des femmes dans l'Etat social à ces débuts. Elle relève aussi le rôle de la contradiction entre les objectifs de l'Eglise catholique à propos des mesures caritatives et philanthropiques en faveur des pauvres et des défavorisés et ceux de l'Etat français. Elle conclut que l'insistance du féminisme français sur l'indépendance féminine et ses demandes de partenariat au niveau social ont finalement apporté des avantages significatifs aux femmes dans les dispositions de l'Etat providence de l'après-guerre. Cela malgré le monopole masculin entre 1848 et 1944, et en particulier durant la Troisième République, sur les prises de décision politiques.

The French welfare state (*l'Etat providence*) under the Republic, was – like welfare states throughout Europe – constructed not only in response to contests over class issues, as socialist historiography would have it, but in response to gender issues. Indeed, gender issues could hardly be avoided, lying as they do squarely at the heart of human sociopolitical organization, and at the heart of answers to questions about how to deal with poverty and its accompanying problems. In recent years, a flowering of feminist historical analysis by scholars both in France and outside the Hexagon has brought these concerns to the forefront, exposing the centrality of women and gender not only to the process of nation-building in Europe but in particular to the formation of the welfare states that followed World War II.

Contributions by a new generation of feminist scholars have demonstrated the importance of placing gender at the center of analysis of welfare state formation (as well as of urbanization and industrialization), and also of engaging in a practice of comparative analysis. Such analysis throws into relief the national/societal characteristics of each system. Multi-national collections of scholarly studies assembled by Gisela Bock and Pat Thane (1991) concerning the comparative development of maternity policy; by Valerie Fildes, Mara Marks, and Hilary Marland (1992) on maternal and infant welfare; by Seth Koven and Sonya Michel (1993) on maternalist politics and the origins of welfare states; and Ulla Wikander, Alice Kessler-Harris, and Jane Lewis (1995) on comparative protective labor legislation for women, are helping us to understand the centrality of gender issues, and – in particular – the long-hidden

importance (because too often on the losing side) of feminists as actors and bearers of alternative, woman-centered visions of citizenship and state) in challenging the ultimately victorious paternalistic, even patriarchal welfare states installed in European countries. Indeed, both the “gender” of power/authority, the objects of its concerns, and the sexual politics within the family stand starkly revealed by these analyses.¹

Consequently, instead of a “worker” (or a “soldier”) as the primary beneficiary of welfare state construction, we now recognize that in many post-World War II welfare states, the neutral term “worker” in fact stood in for a male breadwinner supporting a dependent wife and children. Perhaps because of the embeddedness of a scarcely-disguised *masculinisme* in their own common tradition, Anglo-American revisionist scholars have done a particularly astute job of smoking out the “gender” of “workers”, the “sex” of breadwinners, and of revealing the assumptions that underlay certain seemingly neutral measures whose inadvertent effect (if not expressed objective) was to perpetuate the subordination and dependence of women.² In so doing, this historical work has disinterred the competing arguments that marked the struggle over state welfare.

One point concerning this struggle that deserves to be underlined with respect to any discussion about women’s place in the welfare state is that the condition of motherhood lies at the *center* of the debates. It is not, as some scholars would claim, (merely) a prism (one among others) through which all sorts of other issues are refracted.³ Gender relations and in particular reproduction of the next generation are the central focus, the nub around which all else circles; they are not merely the medium, they are the message. With respect to

1 Gisela Bock and Pat Thane, eds., *Maternity and Gender Policies: Women and the Rise of the European Welfare States. 1880s–1950s*. London & New York: Routledge, 1991; Valerie Fildes, Lara Marks, and Hilary Marland, eds., *Women and Children First: International Maternal and Infant Welfare. 1870–1945*. London: Routledge, 1992; Seth Koven and Sonya Michel, eds., *Mothers of a New World: Maternalist Politics and the Origins of Welfare States*. New York & London: Routledge, 1993; Ulla Wikander, Alice Kessler-Harris, & Jane Lewis, eds., *Protecting Women: Labor Legislation in Europe, the United States, and Australia, 1880–1920*. Urbana & Chicago: University of Illinois Press, 1995. See also Gisela Bock, “Poverty and Mothers’ Rights in the Emerging Welfare States”, in *A History of Women: Toward a Cultural Identity in the Twentieth Century*, ed. Françoise Thébaud. Cambridge, Mass.: The Belknap Press of Harvard University Press, 1994, pp. 402–432, and Nadine Lefaucheur, “Maternity, Family, and the State”, in *ibid.*, 433–452.

2 See, in particular, the following two collections of essays, which also contain references to significant prior publications: Ava Baron, ed., *Work Engendered: Toward a New History of American Labor*. Ithaca: Cornell University Press, 1991; Laura L. Frader and Sonya O. Rose, eds., *Gender and Class in Modern Europe*. Ithaca: Cornell University Press, 1996.

3 As, for example, in the post-modernist interpretative work (informed by the analyses of Joan Scott) by Joshua H. Cole, “‘There Are Only Good Mothers’: The Ideological Work of Women’s Fertility in France Before World War I”, *French Historical Studies*, 19:3 (Spring 1996), 639–672. Cole, like other post-modern academics who critically examine the category “woman” implicitly questions the link between “women”, and childbearing. This article appeared as part of a forum on the theme of: “Population and the State in the Third Republic”, *French Historical Studies*, 19:3 (Spring 1996), edited by Rachel G. Fuchs. Other pertinent articles are by Jean Elisabeth Pedersen, Cheryl A. Koos, and Andrés Horacio Reggiani.

France, Elinor Accampo pinpointed the problem when she stated that “The notion that women’s bodies were not their own became translated into law between 1874 and 1919.”⁴

In order to understand the scope and particular formulation of the French welfare state, it helps to keep in mind two aspects of continuity in French history. The first of these is the long and competing traditions of involvement in issues of personal life and morality (i.e., sex and reproduction) both by the Roman Catholic Church and the French monarchy, a rivalry that long antedates the Church/State conflicts of the nineteenth and twentieth centuries. Competing approaches to charity toward the poor marked and were deeply marked by this rivalry. Of particular historic relevance is the intrusive campaign of the French state (both under the monarchies and under the republics) on the subject of population and reproduction, which began in the mid-sixteenth century with kingly interest in “protecting” fetuses and newborns (especially those conceived out of wedlock) from abortion and infanticide by demanding sworn “déclarations de grossesse” from pregnant women. Related concerns were common both to the several monarchical regimes of the nineteenth century as well as the ensuing Third and Fourth republics.

A second aspect, coincident with the French Revolution, is that strong secular claims were made by some revolutionary politicians (most notably by the Committee on Begging, 1791) to the effect that (in William Fortescue’s phrasing) “public assistance should become a national responsibility”.⁵ Thus was framed the ambitious and perhaps utopian socialist claim for a centralized, top-down state obligation toward all its citizens, which would ultimately lie behind and inform most battles over social policy, and especially the jagged movement from assistance (both private and public) to social insurance in France that marked the years from the 1800s to 1945.

Even as the successive French republics since 1789 have retained a theoretical commitment to encompassing everyone – all *citoyens* – “la nation” including protestants, jews, and blacks – their supporters have demonstrated both extraordinary insensitivity and, often, outright resistance in dealing with the claims for parity by women. Several times during the Revolution, male republican politicians wrote women out of the succeeding constitutions, not on grounds of principle but on grounds of “public utility” – as defined, first, by the Declaration of the Rights of Man, and then by subsequent decisions of the assemblies, who by positing a distinction between “civil” rights and “civic” rights, foreclosed on women’s political activity by disassociating it from their newly-granted property rights. The closing of women’s clubs by the Jacobins

4 Elinor Accampo, “Gender, Social Policy, and the Formation of the Third Republic: An Introduction”, in *Gender and the Politics of Social Reform in France. 1870–1914*, ed. Elinor A. Accampo, Rachel G. Fuchs, and Mary Lynn Stewart. Baltimore and London: The Johns Hopkins University Press, 1995, p. 9.

5 See William Fortescue, “The Role of Women and Charity in the French Revolution of 1848: The Case of Marianne de Lamiartine”, *French History*, 11:1 (1997), p. 57.

in 1793 was merely the last nail in the coffin for a series of contestations over women's claims to engage fully in public and civic activism. French feminists (women and men alike) repeatedly contested prevailing notions of "citizenship", in France from 1789 to 1945, when at last, after the humiliating Vichy years, the governments of the Liberation accorded women those long sought and highly prized civic rights, the right to vote and to run for public office. This ostensible "universality", of citizenship, so long contested by women, has only recently begun to be seriously tested once again with respect to immigrants from non-European cultures.

Meanwhile, in the late nineteenth- and early twentieth centuries, under an all-male "democratic" republic, the issue of "protecting" women workers in industrial production became particularly divisive, with liberals of both sexes defending women's right to work as they pleased, and others (including social Catholics and socialists) advocating state intervention in the industrial workplace on behalf of women's importance as mothers (of France's future soldiers and workers, gendered male). But the motherhood potential of married women workers was by no means the sole concern. In nineteenth-century cities, there were increasing numbers of poor unwed mothers, young women who were sometimes servants or seamstresses, who had been unsuccessful in attempting to earn a living for themselves and who found themselves "poor and pregnant in Paris", in Rachel Fuchs' eloquent formulation, a city that had "one of the highest illegitimacy rates in the western world" and a high rate of child abandonment.⁶

Thus, there were some serious questions that French authorities – at the municipal, departmental, and national levels – felt obligated to address. Yet the combination of the French historical tradition of intrusiveness into sexual and reproductive matters, the ongoing concerns about population growth and strength, and, from 1848 to 1944, the all-male character of the polity, has raised many questions for historians about what kind of measures were finally initiated, what kind of laws were made, and by whom, and how state benefits would be configured when women were neither present in the decision-making process, nor represented by their own kind (though there were a few male representatives who did take women's articulation of the issues seriously). Such question had been repeatedly and insistently raised by feminists, from the time of the Estates-General in 1789 up to and including today's petitioners for "parity", or the equal representation of women in law-making bodies.⁷

6 Rachel G. Fuchs, *Poor and Pregnant in Paris: Strategies for Survival in the Nineteenth Century*. New Brunswick, N. J.: Rutgers University Press, 1992.

7 Karen Offen, "Women, Citizenship and Suffrage with a French Twist, 1789–1993", in *Suffrage and Beyond: International Feminist Perspectives*, ed. Caroline Daley & Melanie Nolan. Auckland: Auckland University Press, 1994; also co-published by Pluto Press, London, and New York University Press, New York.

We Americans from the United States, with our federal state and our highly individualistic and anti-governmental outlook, have virtually no tradition of national welfare (in contrast to our next-door neighbors in Canada) comparable to that of France, and even the measures we have enacted since the 1930s (such as aid to dependent children) have been vehemently and repeatedly contested. Education and welfare issues have been predominantly under the control of the fifty federated states and local jurisdictions. In contrast to the post-revolutionary French, we have never had a deep commitment of “social entitlement”, other than to veterans of the armed forces, though some would prefer it if we did; our meager “social security” for partial support of formerly employed persons in old age (funded by employer and employee contributions) comes the closest, along with medical insurance (Medicare) for the aged population; neither of these programs provide full benefits, and in part due to contemporary demographics, both are threatened with insolvency. “Workmen’s compensation” in case of injury or disability is a state-level, not a national-level program. The comprehensive package of measures initiated on behalf of mothers and children in the 1920s under the Sheppard-Towner Maternity and Infancy Act were vehemently contested and, ultimately, never renewed.⁸ In the US, welfare provides a “safety net”, but not a hammock, and even that level of support is being contested in many states; even improvident mothers of small children are encouraged to enter job-training programs. In consequence, American scholars find centralized European welfare states quite intriguing, even exotic, or “other”, and perhaps analyze them with quite a different eye than do their Canadian counterparts, whether of the French-speaking or English-speaking areas, or their British, German, or Scandinavian colleagues, all of whom take state welfare far more for granted. The French *Etat providence* is especially intriguing, being one of the earliest to assume institutional shape, one of the most class-blind, and perhaps without peer (with the possible exception of the Scandinavian systems) in its demonstrated beneficence to women situated not as “individuals” but as mothers.

In what follows, I want to examine the arguments made concerning the French welfare state in a series of new publications by historians situated both outside and inside France to show how this new scholarship has revealed not only the centrality of women’s issues in the French case, but also the importance – thought limited success – of French feminists in attempting to shape the agenda of the emerging welfare state during the early to mid-twentieth century.

⁸ The Sheppard-Towner Act was the first public health program to be initiated and funded by the United States federal government. It provided matching federal funds to states to establish prenatal and child health centers, with the goal of reducing infant mortality through the education of poor mothers by other women trained in hygiene and puericulture (to use the French term), and emphasizing health over sickness. The measure was the first legislative triumph of American women social reformers following the enactment of woman suffrage in 1919–20. However, as physicians moved to co-opt preventive health care and the American Medical Association opposed the Sheppard-Towner programs, the program did not survive into the 1930s.

Although the Anglo-Canadian historian Mary Lynn Stewart's study of protective legislation for women workers in France is primarily concerned with state action affecting women's situation as workers in the labor market, it is highly revealing of attitudes that would deeply affect the construction of the French *Etat providence* after 1945. Stewart is committed to economic independence for women, and from that standpoint she underscores and confirms the historical establishment of a "social patriarchy" in France, designed to defend the male-headed family and the existing patriarchal social order by marginalizing (albeit with all the good will in the world) women in the workforce. Along with Solidarist republicans, social Catholics, and some industrialists, advocates from the French Socialist parties supported and defended the differential measures for women workers, enacted from 1892 on, while many French feminists vociferously opposed them in the name of women's unrestricted right to work. Indeed – and this conclusion emerges ever more firmly from historical analyses – it seems that gender solidarity functioned as the historical glue that could bond men together across party lines in the troubled democracy of Third Republic France. And when these coalitions of male legislators made the rules, without even taking women's representations of their situations as working women into account, the results were surprisingly predictable.⁹ Most often, children, not women, became the focus of state legislative action; as childbearers (literally, as walking wombs, and increasingly as walking wetnurses) women were all too frequently treated instrumentally, rather than as persons in their own right. From a feminist perspective, this instrumentalization was deemed – and remains – unacceptable.

In the important collection of feminist analyses by a cluster of North American historians, *Gender and the Politics of Social Reform in France. 1870–1914* (1995), co-editor Rachel Fuchs emphasizes the *early beginning* of the French welfare state in the period immediately following 1870. By examining policies affecting families and maternity, rather than policies addressed to male workers, all the authors in this collection effectively "decenter", the conventional concerns. Once this decentering is done, France stands revealed as a *leader* in the process of welfare state formation; this is due in great part to the concern with *depopulation*, centrality of mothers to bearing and raising children for the state. "France did not lag behind [...] it was in the forefront of many social reforms." [...] "France was a European leader in designing family policies and family allowances", argues Fuchs.¹⁰ The articles in this collection focus primarily on the activities of male policy makers; the exception is Linda L. Clark's study of Pauline Kergomard, a "maternalist" feminist educator who became a prominent public official.

9 Mary Lynn Stewart, *Women. Work and the French State: Labour Protection and Social Patriarchy. 1879–1919*. Kingston, Montreal, London: McGill-Queen's University Press, 1989.

10 Rachel Fuchs, "France in a Comparative Perspective", in *Gender and the Politics of Social Reform in France*, 157–187; quotes, 159, 160.

“Children” and “families” are also the concerns of policy formation studied by the North American historian Susan Pedersen in her recent study, *Family Dependence, and the Origins of the Welfare State: Britain and France. 1914–1945* (1993). This work provides a pathbreaking comparative examination of approaches to the redistribution of wealth, placing gender issues and – in particular – concerns about mothers and infant welfare at the center of her analysis. Pedersen’s intent is to contest the hegemony of the British “male breadwinner welfare state” model as the paradigm by which social theorists measure all others. In France, as Pedersen demonstrates, the male breadwinner imperative never provided the norm either for the prevailing model of masculinity or for the development of social policy, despite its prevalence in trade union circles. In France, “parental policies do not assume that women are necessarily dependent, nor that men always have ‘families to keep’; rather they presume the dependence of children alone and hence redistribute income primarily across family types and not along gender lines” (p. 17). Nor are social class lines at issue in this logic.¹¹ In France, “the success with which social Catholics and pronatalists defined aid to families with dependent children as a patriotic measure proved a useful cover for employers eager to distribute allowances in lieu of wages” (p. 19). She describes the family allowance law of 11 March 1932, which required all French businesses of a certain size to affiliate with a family allowance *caisse* as “the single most important piece of social legislation passed in interwar France” (p. 372). The employer-funded family allowance system was later incorporated into the post-war welfare system of the French state, though it continued to be administered separate from social security.

Where Pedersen’s argument can be faulted is with respect to the place of feminist claims in the elaboration of these policies. She assesses French feminist claims on these issues as “weak”. By this she seems to mean that French feminists lacked formal political clout, which is true enough, given that women in France, though they did exercise significant influence, still had no formal vote. But she also suggests that their embrace of maternalist and pronatalist rhetoric *per se* similarly indicates their weakness.

Without wishing to overestimate the organizational strength of French feminism in the 1930s, I think it can be fairly said that the movement’s ideas on subjects of distributive justice, especially where women were concerned, were well known, sharply stated, and indeed widely supported. In fact, it can be shown also that their “relational” perspective was characteristic, and even advantageous.¹² As Jeanne Lavergne put it in a pamphlet dedicated to Madeleine Ver-

11 Susan Pedersen, *Family Dependence, and the Origins of the Welfare State: Britain and France. 1914–1945*. Cambridge and New York: Cambridge University Press, 1993. For further analysis, see my review of Pedersen’s book in *Contemporary French Civilization*, 20:1 (1996), 191–194.

12 For further elaboration, see Karen Offen, “Body Politics: Women, Work and the Politics of Motherhood in France, 1920–1950”, in *Maternity and Gender Policies*, 138–159, and more recently, Anne Cova, *Maternité et Droit des femmes en France (XIX^e–XX^e siècles)*. Paris: Anthropos, 1997.

net in the mid-1930s, “Les droits de la mère sont la conséquence logique de l’acquisition des droits de la femme.”¹³ Even as French feminists staunchly defended women’s right to work and called for equal pay, most also agreed that the state should both acknowledge and reward motherhood. As Susan Pederson has underscored, “French social policy would remain concerned with the problems of reconciling motherhood with women’s wage earning, a focus that would differentiate it sharply from British choices” (pp. 105–6), and this at the level of national, not local, politics. Apart from the vote, “social”, rights, not individual rights, seemed to occupy center stage for feminist efforts in France, in contrast to much of the Anglo-American world.

To understand this focus, it is important (as I have suggested earlier) to look once again at the *longue durée*, to the precedents for intrusive state intervention in family organization and structure, and the history of feminist argumentation/contestation that arose to contest such intervention. Indeed, paradoxes cease to exist; metaphors take on substance; and contradictions disappear when the historian re-submerges herself in the debates of the times, and it is possible to trace many continuous threads. Not only can we then see revealed the open tensions between secular political and social economists, and, of course, the social Catholics (and other pro-patriarchal family advocates, including trade unionists) with their wish to impose the male breadwinner (“le mari pourvoyeur”), and the feminists who insisted – from the eighteenth century on – that women must be treated not as dependents but as full partners in the business of constructing a new society. Nineteenth-century feminists including Flora Tristan, Julie-Victoire Daubié, and Jenny P. d’Héricourt insisted that women’s economic independence was the key to their equality as partners, and that, whether this independence was guaranteed through paid labor, or through state support, male domination was no longer acceptable. Socialist feminists in the Fourierist tradition, in particular Léonie Rouzade, argued from the 1880s on for state recognition and support for motherhood, whether women were married or single; Aline Valette and others elaborated on these arguments. Such ideas would be picked up and developed strongly in northern Europe from the 1890s on through the works and influence of the Swedish writer Ellen Key, and they would be strongly advocated by radical German feminists in the early 1900s through the campaigns of the *Mutterschutz Bund*. Adherents of the Marxist/Leninist tradition were, thus, in good feminist company when they insisted on the importance of women’s economic independence; their insistence on prioritizing class conflict over women’s emancipation distanced them from the important feminist campaigns of the time.

13 Jeanne Lavergne et Madeleine Vernet, *Nous les mères, la guerre et nos enfants*. Rabat: Editions F. Moncho. Undated but with internal references to 1935, and to the campaigns of mothers for peace.

From the vantage point of her multi-national project on women and welfare states, based at the European University Institute in the late 1980s and early 1990s, the German feminist historian, Gisela Bock has emphasized that “many women fought for suffrage and full citizenship not merely for the sake of formal equality with men [...], but for the sake of shaping social policies in favor of women”.¹⁴ The issue was ultimately whether women would be instrumentalized by social policy formulation (by focusing on them as strictly mothers of *children*, as the pronatalists and family lobby advocated) or whether such policies could be directed toward women’s empowerment and independence.

Whereas in countries such as Britain and Germany, where instrumentalization of women as mothers and wives marked the organization of post- World War II welfare states, in France, feminists actually succeeded in two significant respects. In the first instance, women’s right to employment (including married women) – so threatened during the 1930s depression – was reasserted by Third Republic governments, in no small part due, I think, to the insistence of feminists, as well as to the centrality of women’s work for the French economy, and these guarantees were inscribed in the constitution of the Fourth Republic. The second instance concerned the critical issue of distributing the so-called “family” allowances, between the important law of 1932 and the establishment of the *Etat providence* in 1945–46. Both these issues offer telling “sites for analysis” for the French case, both with respect to issues of gender in welfare state formation and with respect to the importance of feminist advocacy.¹⁵ Women may not have had the vote in France before 1944–45, but in the realm of welfare state development and even without the vote they were nevertheless able to achieve remarkable privileges in a political climate marked by population issues and male politicians’ concern about the future of the nation. From an American perspective, it looked as though French women had achieved an enviable position as both having equal rights with men and state support (though diminishing) for their special situations as mothers.

Seen from France, however, the scenario for women in the French welfare state does not look quite so rosy. Two recent works by Anne Cova and Yvonne Knibiehler point to the problems as well as the triumphs of women’s engagement in the construction of the French *Etat providence*. Cova’s 1997 book, *Maternité et droits des femmes en France (XIX^e–XX^e siècles)*, summarizes her exhaustive three-volume dissertation, completed at the European University Institute in 1994 under the direction of Gisela Bock and Michelle Perrot. Cova emphasizes the extent to which France was a pioneer in matters of family al-

14 Bock, “Poverty and Mothers’ Rights”, p. 403.

15 See Offen, “Body Politics”, for further elaboration of these points.

locations, but reinforces the conclusions of earlier scholarship concerning the extent to which populationist concerns drove the articulation of welfare state measures, and the extent to which French feminists spoke the language of national need as they attempted to turn the dominant discourse to favor measures they would propose. She concludes that “The protection of maternity has modified the relations between the sexes, by allowing mothers not to depend entirely on men’s earnings, but it has neither fundamentally overturned nor placed in question the traditional hierarchy between the sexes”. Pointing to the continued conflicts over reconciling women’s employment with childcare, Cova’s conclusions are tempered by a recognition of the ongoing difficulties of women’s situations, even as she insists on the importance of women and their issues in bringing about the French welfare state.¹⁶

In terms of the effects of this welfare state for French women, the French historian Yvonne Knibiehler raises a series of important issues in her new study *La Révolution maternelle depuis 1945*, which examines developments across three generations of mothers and daughters.¹⁷ Among the salient points she underscores are the effective collapse of French feminism in the late 1940s and 50s, but she especially insists on the renewed and elaborate intrusions of French scientists and other observers into the lives of those mothers who are “controlled” and regulated not only by the new institutions of the welfare state, but also by the inquisitiveness of social scientists, psychologists and psychiatrists, and medical authorities themselves. Once again, the lives of women and children are not their own, but must endure the scrutiny of others. Even as the patriarchal family falls to ruin, Knibiehler queries whether “patriarchy”, itself will disappear, given that the *Etat providence* has substituted itself for fathers. “It is the State, henceforth, that extends an ambivalent protection to mothers, and even this is controversial, menaced. Can an authentic womanly citizenship be constructed from among the ruins? How can it be constructed?”¹⁸ To Knibiehler’s questions, I would add: Can any male-dominated welfare state provide for – and adequately fund – a satisfactory answer to ‘the woman question’ as concerns combining employment and maternal responsibilities? Can such a state ever guarantee women’s empowerment and independence? Surely, these are important questions to which feminist historians are only now in a position to begin to answer conclusively, whether in France or elsewhere.

16 See the “Conclusion” to Cova, *Maternité et Droit des Femmes*, pp. 392–411; quote, p. 411.

17 Yvonne Knibiehler, *La Révolution maternelle depuis 1945: Femmes, maternité, citoyenneté*. Paris: Librairie Académique Perrin, 1997.

18 Knibiehler, *Révolution maternelle*, p. 14.