

Translating "Sexual Harassment" in Japan and Egypt: Conception and Perception on the Move

Goto, Emi

Veröffentlichungsversion / Published Version

Zeitschriftenartikel / journal article

Empfohlene Zitierung / Suggested Citation:

Goto, E. (2023). Translating "Sexual Harassment" in Japan and Egypt: Conception and Perception on the Move. *International Quarterly for Asian Studies (IQAS)*, 54(2), 173-190. <https://doi.org/10.11588/iqas.2023.2.22457>

Nutzungsbedingungen:

Dieser Text wird unter einer CC BY-NC-ND Lizenz (Namensnennung-Nicht-kommerziell-Keine Bearbeitung) zur Verfügung gestellt. Nähere Auskünfte zu den CC-Lizenzen finden Sie hier:

<https://creativecommons.org/licenses/by-nc-nd/4.0/deed.de>

Terms of use:

This document is made available under a CC BY-NC-ND Licence (Attribution-Non Commercial-NoDerivatives). For more information see:

<https://creativecommons.org/licenses/by-nc-nd/4.0>

Translating “Sexual Harassment” in Japan and Egypt: Conception and Perception on the Move

Research Note

Emi Goto

Abstract

This research note is based on work in progress relating to the relevance of translation and semantic framing for the public perception of newly introduced concepts. The article traces trajectories of public perception of the concept “sexual harassment” in different countries. It sheds light on the role played by the translation words that were chosen to introduce the concept into societies where it was not yet established as a term denoting a violation of women’s rights and a serious offence. The term “sexual harassment” was coined in the United States during the 1970s and was subsequently adopted in various parts of the world. Two societies in which the term was adopted in transliteration and translation are Japan and Egypt. In the case of Japan, the term was introduced during the 1980s, yielding the transliterated Japanese loanword *sekushuaru harasumento*, later abbreviated to *seku-hara*. It became a buzzword, yet with a less serious nuance than the English term originally aroused. Egypt adopted the term in the 2000s, translated as *taharrush jinsī* in Arabic. The translation word *taharrush jinsī* was strategically selected and subsequently framed so as to denote a serious offence. Examined through an approach known as the “cassette effect”, the comparison of the two cases suggests that the process of framing the meaning of terms and concepts by social movements and advocacy groups is highly significant for their public perception.

Keywords: Sexual harassment, translation, transliteration, framing, cassette effect, Japan, Egypt

The movement against violence against women (VAW) in general and against sexual violence in particular has been developing since the 1970s. It is one of several ongoing modes of civil society activism globally. The recent explosion of the #MeToo movement¹ may be interpreted as proof that, despite decades of endeavour, sexual violence continues to affect people’s lives negatively and

Emi Goto, Research Institute for Languages and Cultures of Asia and Africa, Tokyo University of Foreign Studies, Japan; emi-goto@aa.tufs.ac.jp. This study was sponsored by Grant-in-Aid for Scientific Research 16H06549 and 21H04387 from the Japan Society for the Promotion of Science. This is a revised and developed version of the article “Kotoba ga ugoku toki: ‘Sekushuaru Harasumento’ no tanjo, yunyu, honyaku”, in: Hiroshi Fukuda / Emi Goto (eds): “*Mienai kankeisei*” *wo miseru* [Visualization of Invisible Relationship], Tokyo: Iwanami Shoten, 2020, pp. 208–228.

extensively. Surveys on the state of affairs in the workplace, in academic settings and on the streets or in public places have increased, along with questions about the possible shortcomings of previous movements and how they can be supplemented.² Why are some advocacy movements against sexual VAW successful in achieving their goals and others not? What affects the public perception of a concept such as sexual harassment? This research note raises these same questions and attempts to answer them by shedding light on the role played by translation/transliteration and subsequent framing of concepts.

In the mid-1970s, American scholars and activists coined the English-language term “sexual harassment” to designate unwelcome sexual advances in the workplace. The term spread to various parts of the world in the following decades, in many cases via translation from English to local languages. Studies have shown that while it was important to name the uncomfortable experiences of sexually vulnerable individuals and groups (mainly women), to protest the unjust treatment they suffer and to initiate changes in the underlying social structure, different nuances were embedded in the meaning of “sexual harassment” or its translated expression in accordance with the local context, and such nuances affected the substance of the movements (Saguy 2000, 2003; Hong 2004; Suchland 2005, 2008; Zippel 2006).

While these studies focused on societies in which the term “sexual harassment” was coined or adopted and how the concept was developed, the current research note zooms in on the role played by the term itself, its translation/transliteration and its framing in the respective target societies. The new expression “sexual harassment”, which emerged in different societies, brought forth changes in law, social atmosphere and individual perceptions and behaviours. At a certain point, however, it appears that the concept became a taken-for-granted word that prevented the anti-sexual-violence movement from advancing. I seek the reasons behind this change in perception by examining and comparing the cases of Japan and Egypt, preceded by a review of the term’s emergence and unfolding in its place of origin, namely the United States of America (hereafter: US).

When the term “sexual harassment” was coined in the US in the 1970s, it helped people to recognise the harm that many women had been experiencing. Women could openly complain about it and file lawsuits. However, over the course of time, it became a somewhat “toothless” and ubiquitous expression.

1 This is a movement aimed at changing how society tolerates sexual violence. It began with a tweet posted by the American female actor Alyssa Milano on her Twitter account: “If you’ve been sexually harassed or assaulted, write ‘me too’ as a reply to this tweet”. Her appeal received 500,000 tweets and over 12 million Facebook posts within 24 hours (see Gilbert 2017). For an analytical and descriptive account of the context and the expansion of the #MeToo movement, see Fileborn / Loney-Howes 2019.

2 For a detailed study on the pre #MeToo movements in the US, see Hillstrom 2019 and Gieseler 2019. The Japanese magazine *Gendai Shiso* (Contemporary Thought) prepared a special issue entitled “Sexual Violence=Sekuhara” in June 2018 that reviewed earlier movements in Japan. After the emergence of the #MeToo movement, retrospective lectures, articles and memoirs looking back to the earlier movements increased, with critical reviews.

The term was imported to Japan in the 1980s, yielding a transliterated Japanese expression – *sekushuaru harasumento* – later abbreviated to *seku-hara*, which became a buzzword in public discourse. However, the Japanese *seku-hara* never evoked the effect of the original English term; instead, it took on a less serious nuance. In Egypt, sexual harassment was translated (not merely transliterated) into Arabic, and its translation changed over time. It was in the 2000s that the term *taharrush jinsi*, which symbolises a serious offence, was strategically selected to designate sexual harassment, and the movement denouncing *taharrush jinsi* has expanded ever since.

The developments in public perception of the imported concept of sexual harassment differ strikingly. This article addresses these different trajectories through the lens of the framing adopted by the transliterated/translated terms *seku-hara* and *taharrush jinsi* in Japan and Egypt, respectively. It analyses the cases by applying an approach known as the “cassette effect”. This approach was developed in Japan in the 1970s and is used to examine the experiences of translations from Western concepts in modern Japan. In the early twentieth century, when concepts from the West were frequently introduced to Japan, in some cases the Japanese language had corresponding words and in others it did not. In the latter case, new words were created using sets of Chinese characters or transliterations in order to convey the meaning of the imported concepts. Akira Yanabu³ maintained that these newly introduced translation/transliteration words were like “cassettes” (jewellery boxes), attracting people with the vague expectation that they must contain some important meanings. They were appreciated, yet, at the same time, tended to be accompanied by an emotional and sensory aversion to the new and unknown (Yanabu 2009, 2011). Attraction, appreciation and any rejection or aversion can be conceived of as affective reactions towards the denotation of particular terms. Such affective reactions are related to the respective framing of a term. “Freedom”, for instance, may be appreciated as referring to a state of autonomy, having the power or right to act unrestrictedly. At the same time, “freedom” may have a negative connotation when used to describe a person’s disregard for convention. The cassette effect describes an approach that is similarly connected to the process of framing of a concept, which may arouse either excitingly appealing or strongly disagreeable responses – or both at the same time.

By tracking the difference between the Japanese and Egyptian cases against the backdrop of the initial emergence of the concept “sexual harassment” in the US, this study hypothesises that the framing of a transliterated/translated term is directly connected to the effects it brings, and, furthermore, to the opportunities for advocacy activists to develop a movement against sexual harassment.

3 For an introduction to Yanabu as well as some of his main arguments translated into English, see Yanabu et al. (2008).

The US: “Sexual harassment”, formed and sanitised

In October 2017, when the media were widely covering the #MeToo movement, US-American journalist Lin Farley was interviewed on the radio and spoke about how the term “sexual harassment”, now a widely used expression in the US, was first coined. In 1974, Farley was hired by Cornell University in New York State to give lectures about women and work. She discovered that most of her students had had experiences where they were forced to resign or fired from their jobs for refusing the sexual advances of their bosses and managers. Farley came to believe that these experiences were not recognised as being universal or a problem, despite the frequency of their occurrence, because they did not have a name. Following deliberations with colleagues, Farley decided upon the term “sexual harassment of women at work” as a suitable way of describing these experiences.

The term was first used publicly in April 1975 at a Public Hearing of the New York State Human Rights Commission. *The New York Times* covered the event in an article with the headline “Women Begin to Speak Out Against Sexual Harassment at Work”, after which the term “sexual harassment” gradually spread and adopted conceptual strength (Farley 2017, On the Media 2017).

Farley’s book *Sexual Shakedown: The Sexual Harassment of Women on the Job* was published in 1978, in which she defined sexual harassment as “unsolicited nonreciprocal male behaviour that asserts a woman’s sex role over her function as a worker” (Farley 1978: 33). She wrote that sexual harassment could be any or all of the following: “staring at, commenting upon, or touching a woman’s body; requests for acquiescence in sexual behaviour; repeated non-reciprocated propositions for dates; demands for sexual intercourse; and rape” (ibid.). Furthermore, Farley drew attention to how this behaviour was facilitated by the “superior male status in the culture, sheer numbers, or the threat of higher rank at work to exact compliance or levy penalties for refusal” (ibid.). American legal scholar Catherine MacKinnon also emphasised the same point and was instrumental in the conceptualising, institutionalising and passing of sexual harassment legislation. MacKinnon expressed a broad definition of sexual harassment as “the unwanted imposition of sexual requirements in the context of a relationship of unequal power”, arguing that it is not simply “abusive, humiliating, oppressive, and exploitative”, but also a form of sex discrimination in employment (MacKinnon 1979: 1–6).

From the late 1970s onwards, courts across the US began passing rulings that judged sexual harassment in the workplace as violating legislation that enshrined the equality of the basic rights of citizens. Title VII of the Civil Rights Act of 1964 (equal employment opportunity) states that it is unlawful to disadvantage any person by denying employment, firing or discriminating in terms of compensation

or terms and conditions of employment, on the basis of “race, color, religion, sex, or national origin”. The courts found that sexual harassment fell within the remit of sex-based discrimination. The first judgment was handed down in 1976 from the United States District Court for the District of Columbia. A woman working in the US Justice Department’s Community Relations Service brought a complaint to the court for being harassed by her boss and later being dismissed for poor work performance after she rejected his sexual advances. The court charged her superior’s employer for violating Title VII and ordered that the female plaintiff be awarded her unpaid wages (US District Court for the District of Columbia 1976).

In 1980, the Equal Employment Opportunity Commission (EEOC, the body that enforces Title VII of the Civil Rights Act) issued guidelines that established the criteria for determining behaviour that constitutes sexual harassment in violation of Title VII:

Harassment on the basis of sex is a violation of section 703 of title VII. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment. (29 CFR § 1604.11)

In this guideline, two patterns of sexual harassment at the workplace are provided: submission to sexual conduct as compensation or condition for employment (above 1 and 2) and sexual conduct that aggravates the working environment (above 3).⁴ The EEOC also issued a primer in 1990 to supplement the guidelines, describing in further detail what constituted sexual harassment, such as how to determine whether sexual conduct was “unwelcome” or whether a work environment was sexually “hostile” (U.S. Equal Employment Opportunity Commission 1990).

In 2017, Lin Farley looked back at the forty years since the term was first coined and spoke about her pride at how the EEOC’s active involvement had created an enabling environment that had assisted many women to file lawsuits. However, she lamented that the revolution she had initially expected had never come to pass.

The working women’s revolution I once envisioned hasn’t happened. But not only that, the term, which once held so much promise, has been co-opted, sanitized, stripped of its power to shock, disturb and galvanize. Today, the term “sexual harassment” may be ubiquitous; the behavior, unfortunately, remains ubiquitous, too. (Farley 2017)

4 This classification corresponds to two forms of sexual harassment termed “Quid Pro Quo” and “Condition of Work” (MacKinnon 1979: 32ff). I have referred to McLain (1981) and Yamazaki (2000) on the Title VII of the Civil Rights Act and EEOC guideline.

In the face of increasing lawsuits, companies have introduced anti-sexual harassment training programmes and manuals. The term “sexual harassment” itself is a common and toothless word one might encounter anywhere. Farley argues that there is a need to bring the term back to its original meaning as “the ugly thing it is” (ibid.). She says there is a need to reclaim the term to the original core of the movement, which is to prosecute sexual violence by exposing the offensive and damaging details alongside the term itself.

As the following sections will show, the introduction of the concept of sexual harassment, with all its positive and negative consequences, also took place in Japan and Egypt, albeit with different trajectories in its public perception.

Japan: *Sekushuaru harasumento*, a loanword transliteration

The sexual harassment movement from the US began permeating into Japan in the early 1980s (Akimoto 1989: 22, Harayama 2011: 172ff.). However, a trial at the Fukuoka District Court in 1989 precipitated the term’s widespread usage. A lawsuit was filed by Mayumi Haruno, a woman working for a publishing company. Haruno, who was in her early thirties, was subjected to vicious rumour-mongering by her superior concerning her relationships with men, which damaged her standing at the workplace. She was ultimately ordered to resign by another superior at her company. She complained to both the Labour Standards Bureau and Summary Court without success. Therefore, as a last resort, she filed a lawsuit for employment discrimination against women. In an account she later authored, Haruno recalled how she carried out a survey of women about their experiences of sexual slander and sex discrimination at their workplaces (Haruno 2001: 68–71). She was convinced that this type of behaviour was universal, rather than individual or unique, to most working women. She was also concerned that most victims of this behaviour could not voice their objections or speak about their pain.

Why are so many women unable to speak about their suffering? Society has decided that it is ‘the generosity of the mature woman’ to pretend obliviousness to unwanted sexual contact, remarks and behaviour at the workplace. They are expected to sweetly laugh in response, and to object would mean to be immature. If you are subjected to sexual violence, you are called heedless. Women have no means of prosecuting any harmful encounter at the workplace. No expression makes others recognise the suffering of women. We can refer to someone who initiates unwanted sexual contact on the train, bus and in other crowded spaces as a *chikan* [a Japanese expression meaning molester or groper]; yet we do not use this term to refer to a person with the same behaviour at the workplace. I vaguely understood that this problem was not unique to me alone, but I could not find the words to describe the harm. (ibid.: 73, translated by author)

While researching “the words to describe the harm”, Haruno discovered the term “sexual harassment” when she saw an advertisement for a special feature in

the magazine *MORE*, which stated: “We will not tolerate it anymore! The reality of sexual harassment”. Haruno felt a flash of deep recognition and immediately bought the magazine.

The article began with the sentence: “Have you ever heard the term ‘sexual harassment’? It refers to all those unwelcome sexual advances women so commonly encounter. You must have had moments at work and in your daily life when someone has done something that made you feel harassed” (*MORE* 1989: 253). The feature included the transcript of a roundtable conversation of women who worked as bank clerks, editors, traders in companies and in the manufacturing industry. Stories of lived experiences and contributions from readers were included in the feature. It also contained quotes from female activists, politicians, journalists and lawyers, as well as information about a handbook published in 1980 by women in the US entitled *Stopping Sexual Harassment*, which had been translated into Japanese in the previous year. Additionally, it was noted that sexual harassment had been added in February 1989 to the Tokyo Labour Office’s discussion on labour matters (*MORE* 1989: 253–262).⁵

In the Fukuoka District Court trial, the plaintiff and their legal counsel decided to use the Japanese phrase *seiteki iyagarase* (sexual molestation) as the translated form of the newly identified concept “sexual harassment”. They submitted that sexual harassment in the workplace was sex-based discrimination that constituted unlawful behaviour and infringed on the dignity of women and their right to equality in the workplace. The submissions were based on Article 13 (“all people shall be respected as individuals”) and Article 14 (“all people are equal under the law and there shall be no discrimination in political, economic or social relations because of... sex”) of the Constitution of Japan, as well as Article 1 of the United Nations Convention on the Elimination of all Forms of Discrimination against Women (CEDAW), which Japan had ratified in 1985 (Haruno 2001: 89–91). The media widely covered the trial, with news articles and programmes initially using either the localised term *seiteki iyagarase* in their coverage or *sekushuaru harasumento*, the Japanese spelling of “sexual harassment”⁶, which later evolved into the abbreviated expression *seku-hara*.⁷

In April 1992, the Fukuoka District Court ruled in favour of the plaintiff. Nearly thirty years after the trial took place, at a lecture held in June 2018, the lawyer Yukiko Tsunoda, who had acted as one of the attorneys in this case and later represented numerous sexual harassment lawsuits, reflected on what did and did not change in the aftermath of the Fukuoka trial (Tsunoda 2018). She stated that one fundamental change was that there was now a term to express

5 The special issue was in *MORE*, July 1989, pp. 253–262. Other weekly magazines had also featured the issue of sexual harassment in the United States before *MORE*’s special issue (Harayama 2011).

6 In Japan, foreign loanwords are written in katakana characters according to their pronunciation.

7 Katakana expressions are often being abbreviated by extracting the first two or three sounds of the terms. *Seku-hara* is from *Seku* [shuaru] *Harasumento*. There are other examples such as *Pawa-hara*, from power harassment, and *mata-hara*, from maternity harassment.

“the sexual abuse facing working women” (ibid.). It is difficult to speak about an injury with no name, and thus, establishing a suitable name made it possible to clarify the essence of the problem for the first time and to develop the discussion around it.⁸

However, Tsunoda also referred to the challenges of determining the choice of a conceptual translation for this injury with no name. At the beginning of the trial, the Japanese translation of *seiteki iyagarase* was used to invoke the original English term “sexual harassment”. However, it was later understood that the word “harassment” was initially used by the US Army and others to mean “a violent and continuous attack”. Therefore, Tsunoda and others on the case reconsidered and decided that the Japanese translation did not express the entire reality and depth of the harm done, and eventually adopted the direct transliteration of the English term “sexual harassment” into katakana characters – *sekushuaru harasumento* – as the preferred term.

The term became widely known, taking first prize in the new word category in Japan’s Word of the Year Contest in 1989. The abbreviated expression *seku-hara* also entered general use. Tsunoda suggests that because the term *seku-hara* has become part of everyday language, it has become easier to talk about sexual harassment in public. She wonders, however, whether the concept has been co-opted without public understanding of its meaning. Japan still has no legal framework for punishing sexual harassment, and therefore trials litigating the harm done have been fought within a tort framework to compensate the individual for infringements against their rights and interests. The sued companies pay out small amounts of compensation compared to the standards set by US precedent. Thus, they suffer very little damage, and the case is closed. Given this scenario, it is impossible to develop any deep analysis or discussion of the underlying issues or what should be done to prevent such cases from happening again (Tsunoda 2018, 2019).

Following reports in April 2018 that Junichi Fukuda, then an administrative vice-minister in the Ministry of Finance, had made sexually suggestive comments to a female reporter, allegations of harassment by politicians and celebrities became topical. In addition, comments by then Finance Minister Taro Aso that “there is no such thing as a *seku-hara* charge” fuelled the debate (Kyodo News 2018, NHK 2018). However, these events and the ensuing public discussion evince no deep-rooted recognition in Japan that sexual harassment is an unlawful behaviour that infringes on an individual’s dignity and right to equal employment.

8 Tsunoda referred to a court case of Nagano Electric Railway Company during 1965–1970 (in which a sexual relationship between a 35-year-old married male bus driver and 18-year-old unmarried female conductor became a point at issue) as an example of how further discussion of the issue of sexual violence at working place is stymied (Tsunoda 2018). As to the cases before the Fukuoka District Court, see Fukushima (1989) and Yamazaki (2000).

Egypt: *Taharrush jinsī*, strategic translation

Translating “sexual harassment”

While in Japan the term “sexual harassment” was adopted through transliteration, in Egypt it was translated into various Arabic phrases. The expression appears to have reached Egypt through literature from United Nations conferences in the 1980s and 1990s (Kreil 2016). The term initially used in Egypt was *mudāyaqa jinsīya*. According to modern dictionaries, the word *mudāyaqa* means “annoyance”, “molestation” or “teasing”, and *jinsīya* means “sexual” (Baalbaki 2002). It was after the 1995 Fourth World Conference on Women in Beijing that sexual harassment began to be translated as *taharrush jinsī* (Kreil 2016). The expression referred, at least until the mid-2000s, to behaviours that inflict severe damage or harm, such as the sexual abuse of male or female children in the home, as well as violence against or rape of women in the workplace or home. Other forms of sexual harassment were referred to using the term *mu‘ākasa*, which is close in meaning to “teasing” and “flirtation” (Abdelmonem 2016: 259–302).

Taharrush jinsī became a term frequently heard in Egypt following a mass sexual assault that took place in October 2006. In media reports, the word was used to describe the incident, which took place on *Eid al-fitr* (the holiday marking the end of Ramadan), when a riotous crowd of young men outside a cinema in the centre of Cairo successively assaulted passing women (Al Malky 2007: 1–2, Rizzo et al. 2012: 464–465).

The year before that incident, the Egyptian Centre for Women’s Rights (*al-Markaz al-Miṣrī li-Ḥuqūq al-Mar’a*; ECWR), an NGO promoting human rights education and legal support for women, embarked on a fact-finding survey about the harassment of women on the streets and public transport. The ECWR gathered responses from Egyptian men and women (1010 each) and foreign women residing in Egypt (109). The survey established that sexual harassment and related abuses that stop short of rape or violence were major problems in Egyptian society.

According to a survey report released by the ECWR in 2008, 83% of Egyptian women and 98% of foreign women in Egypt had been victims of some form of sexual harassment within the country.⁹ This included whistling and catcalling (approximately 68% of Egyptian women and 94% of non-Egyptian women), men ogling women’s bodies as they walked by (47%; 91%), inappropriate touching (40%; 71%), verbal harassment of a sexually-explicit nature (30%;

⁹ It should be noted that the major problem in Egyptian society was sexual harassment experienced on the street, while in the US and Japan the term was developed to designate harassment in the workplace. Ancheta calls the former type of harassment “street harassment” and notes that it is found in many parts of the world (Ancheta 2018).

84%), stalking or following (22%; 66%) and phone harassment (11%; 44%). Approximately 46% of Egyptian women and 52% of non-Egyptian women said they experienced such behaviour daily. The report also stated that women subjected to harassment expressed anger, fear, pain and shame. They told interviewers that they experienced headaches, sleeplessness, nightmares, lethargy, apathy, depression and severe physical and mental harm (ECWR 2008).

As a way of trying to effect change, the ECWR decided to refer to this behaviour as *taḥarrush jinsī* rather than *mu'ākasa*, which was the typical phrase in use at the time for street harassment. This usage is visible in the Egyptian language title of the survey report *Clouds in Egypt's Sky: Sexual Harassment, from Verbal Harassment to Rape (Ghuyūm fī samā' miṣr: al-taḥarrush al-jinsī min al-mu'ākaasāt al-kalāmīya ḥattā al-ighṭiṣāb)*. ECWR head Nehad Abul Komsan explained that the organisation changed the language it used to refer to harassment because a weak term like *mu'ākasa* fails to raise awareness that this type of behaviour is a crime. The ECWR hoped that using an expression with strong connotations would change how society viewed harassment (Abdelmonem 2016: 275–276).

In October 2008, a criminal court in Cairo released a judgment on a case concerning sexual harassment in the street. The case was brought to court by Noha Roshdi, a 27-year-old film director. In June 2008, she had been walking down a street in Cairo when a truck driver drove up next to her and reached through the window to grab her by the chest. He dragged her along and knocked her to the ground; she saw the man inside the departing vehicle look at her with a mocking smile. In frustration and anger, Roshdi ran after the truck, caught the man and handed him to the police ('Azzām / Farghalī 2008).

At that time Egypt's penal code stipulated that (1) whoever has intercourse with a female without her consent shall be punished with fixed-term hard labour (Article 267), and that (2) whoever indecently assaults a person by force or threat, or attempts to do so, shall be punished with hard labour for a period of three to seven years (Article 268).¹⁰ It also stipulated that (3) whoever is found on a public road or a frequented place inciting passers-by to immorality with gestures or words shall be punished by imprisonment for a period not exceeding one month (Article 269 bis).¹¹ Sherif Gibril, the then 28-year-old defendant in the Roshdi case, was sentenced to a harsher punishment; given three years of hard labour and payment of 5,001 Egyptian pounds (approximately 900 US dollars) as a penalty ('Azzām 2008).¹²

10 For the contents of articles, I have referred to "Qānūn raqm 58 li-sana 1937" in *al-Wāqī'a al-Miṣrīya* 81 (1937/ 8/5).

11 The article was amended in 1955. I have referred to "Qānūn raqm 568 li-sana 1955" in *al-Wāqī'a al-Miṣrīya* 94 (1955/12/5).

12 The exchange rate in 2008 was 1 Egyptian pound to approximately 0.18 US dollars. In a film dealing with the issue of sexual harassment and the retelling the Noha Roshdi's case (see the next section), one of the main female protagonists, Faiza, who works at a property registry office, receives a monthly salary of 250–300 Egyptian pounds and is hesitant to spend 10 pounds for a taxi ride between home and the office.

Roshdi’s case was widely reported in the news media and individual blogs as Egypt’s first *taḥarrush jinsī* case. During this period, there was a push in Egypt to increase the legal punishment for the crimes of rape, indecent assault and immoral behaviour in public. There was also organised advocacy to include the expression *taḥarrush jinsī* in the provisions of the penal code. The former effort succeeded for the first time in the March 2011 amendment, in which the sentences for the respective crimes became more severe. The latter was achieved in June 2014. The amended Article 306 bis(a) of the penal code stipulates that a person who confronts others with gestures, speech or behaviour that has sexual or pornographic implications may be punished by imprisonment lasting at least six months and/or a fine of 3,000 to 5,000 Egyptian pounds (approximately 420 to 700 dollars). Such behaviour is considered to be *taḥarrush jinsī* if it is perpetrated with the intention of “gaining sexual gratification” and is then subject to the heavier punishment of imprisonment lasting at least one year and/or a fine of 10,000 to 20,000 Egyptian pounds (Article 306 bis(b)).¹³

Mediatising sexual harassment

In 2010 an Egyptian film titled *678* was released, in which three female protagonists of different social backgrounds experience and fight against *taḥarrush jinsī*. One of them is modelled on Noha Roshdi, another is harassed daily on public transportation and the third has experienced mob violence in a soccer stadium. One issue raised in the film was that women who have suffered from harassment tend to remain silent, not voicing their objections or unable to speak about their pain, even though they feel deeply aggrieved. The film also depicts how those around the women failed to deal with their injury or depression and also examines cases in which family members tried to silence the victim for fear of scandal (Diyāb 2010).

According to the ECWR report mentioned above, the majority of harassment victims did not report their encounters for reasons such as a belief that no one would help them, fear of a negative impact on their reputation, or male police officers often being the perpetrators of harassment. The report also found that both men and women were unlikely to intervene if they witnessed harassment due to disinterest in the affairs of others (ECWR 2008).

The group HarassMap (in Arabic *kharīṭa al-taḥarrush*, or map of *taḥarrush*) was launched in 2010 with a new approach for combatting the two issues of how the victims’ silence conceals the extent of the problem, and the indifference of bystanders when they witness harassment. The project, launched by several former members of the ECWR, uses online mapping technology to facilitate

13 The exchange rate in 2014 was 1 Egyptian pound to approximately 0.14 US dollars. The minimum salary for a public servant was fixed in this year as 700 Egyptian pounds per month. For the process of the amendment of the penal code, I have referred to Takemura 2021. The references for the amended articles of the penal code were Al-Barbarī / al-Minshāwī 2014 and Buḥayrī /al-Minshāwī 2017.

the sharing of information about harassment incidents. Anyone logging onto HarassMap's website can easily post information about harassment incidents they have been victims of, or have witnessed, including dates, location and details of what transpired. The website managers instituted a procedure to moderate the posted information to ensure that no identifying information about the victims is revealed.¹⁴ The members of HarassMap aim both to emphasise the reality of the harassment and to inculcate a willingness among people to take notice and intervene. The website states the following:

We wanted to make sure HarassMap would never be “just a map” and it was important to us that it would have a strong community-based component that could make a strong impact on the ground... In Egypt, there are always people in the street—shopkeepers, doormen, police, people parking cars and drinking tea and socializing. In the past, these were the people who would protect the neighborhood and anyone caught harassing a woman would be chased down and his head shaved as a mark of shame. Everyone would come to help and no one blamed the harassed person. These days, bystanders often pretend they don't see or they sympathize with the harasser and tell the harassed that she/he is to blame, or in the worst cases, they join in the harassment.¹⁵

HarassMap aims to create a society in which people unite to protect others from sexual harassment. This cannot be achieved simply by changing the wording in legal texts; harassment needs to be criminalised, and, at the same time, there needs to be a strong societal consensus that it will not be tolerated. HarassMap members carried out an awareness campaign based on the idea of the safe area programme, in which the members reach out to owners of street kiosks to act as their eyes, watching out for others around them, keeping the area free of harassment (HarassMap 2014b). Another element is the use of video clips to raise public awareness and support. For example, HarassMap uploaded the video series *People who Commit Taharrush are Criminals (al-Mutaharrish Mujrim)* on YouTube following the penal code reforms in 2014. One of the videos is taken inside a dimly lit public bus; in it, a middle-aged man approaches a middle-aged woman wearing a veil and tries to grope her. At this point, the narration begins: “81% of harassment takes place on public transport, which means it takes place in front of witnesses. But no one takes action against it”. The narration goes on to say that harassment is a crime like theft and murder that is punishable under the law by a year's imprisonment and that “silence is not an option”. The video ends with the bus passengers determinedly staring at the harasser, who is handcuffed and being put in the back of a police vehicle (HarassMap 2014a). Through these different programmes that use maps, written words and videos, campaigners have found a way to visualise the locations and nature of harassment in Egyptian society.

14 As for the detail, see their official website <https://harassmap.org/en> (accessed 13 July 2023).

15 'Qiṣṣat-nā' (Arabic) <https://harassmap.org/ar/who-we-are/our-story>, 'Our Story' (English) <https://harassmap.org/en/who-we-are/our-story> (accessed 13 July 2023).

In the 2010s, voices advocating sexual harassment as a criminal offence and calls to blame the harassers, not the victims, overflowed in Egyptian streets and media. With the increase in sexual violence during the confusion of the 2011 uprising, several new collective initiatives against gender-based violence in public spaces were founded.¹⁶ As the term *taharrush jinsī* became part of everyday language, it gained the power to mobilise a movement which, in turn, effectively framed the concept, at least to some extent, so as to evoke feelings of rejection and denunciation towards sexual harassment.¹⁷

The Cassette Effect: Conceptual trajectories, framings, knowledge on the move

We have looked at how the term “sexual harassment” originated and developed in the US and how it has been translated and framed in Japan and Egypt. The question is how to explain the trajectories of the different perceptions of the concept in Japan and in Egypt. It should be considered that the two movements against sexual VAW occurred at different times. Moreover, gender consciousness and the media environment are particularly significant with respect to their local contexts. What remains to be analysed here is the relevance of the framing of the term. The strategies that were employed in framing the transliterated/translated terms can be tracked by using the above-mentioned approach, the cassette effect.

The cassette effect, which attracts people to new words with the vague expectation that they must contain some important meaning, occurs when a concept did not previously exist in the society to which it is introduced. A term may be appreciated by some people, sometimes blindly, and rejected by others, sometimes also subject to personal taste. Even though advocates try to convey a particular meaning by way of a selected translation, once a word has begun circulating in the wider public, it becomes difficult to guide its interpretation, because “words are not at the disposal of those who coined them or defined them” (Yanabu 2011: 38). The semantic change escapes the control of its originators and translators, and the dynamics of public discourse develop in their own way, so that the concept becomes used “in a broader historical and social context, eventually creating its own ‘contextual’ meaning” (Yanabu 2013: 23).

16 As to the initiatives, see Tadros 2016: 229–250.

17 Even in August 2021, partial amendments to toughen penalties for *taharrush jinsī* were added to the Egyptian Penal code; see Takemura 2021 for details. A note should be added about the unexpected effect brought about by the Egyptian campaign to disseminate the term *taharrush jinsī*. Starting at the end of 2015, German media adopted the term *tabarrush* to designate episodes of mob violence against women, particularly after an incident in Cologne on New Year’s Eve. Though it is not clear whether the motivation behind the choice of the term was to connect the incident to migrants and refugees of Middle Eastern or North African origin, the term *taharrush* played a role in promoting discrimination and biased views towards migrants and refugees and fuelled Islamophobia in Germany and surrounding European countries in which the reception of immigrants is an issue. See Abdelmonem et al. 2016.

The fate of the Japanese term *sekushuaru harasumento* or *seku-hara* can be perceived as showing the cassette effect. Although the original meaning of the concept sexual harassment could be understood by most Japanese speakers who studied English at school, it eventually became perceived in ways not intended by its original advocates in the US or Japan. Rather than being conceived of as a serious offence, the notion was watered down to denote something like civil disobedience. The currently dominant comprehension of the Japanese term *sekushuaru harasumento* and its abbreviation *seku-hara* relates to a large extent to the discursive framing of the concept in its particular Japanese context, which implies that the conceptual “cassette” did not contain a revelation that brought about a milestone for women’s rights. Watering the concept down and framing it accordingly led to the connotation of a “light misdemeanour” rather than to the association of *seku-hara* with a serious offence. Apparently, advocacy groups in Japan were comparatively weak in framing the concept so as to arouse an affective reaction of rejection and outright condemnation of sexual harassment – or at least in having this frame become the dominant one in the wider public.

In comparison, the Egyptian case, which involved the process of strategic translation and framing, including a continuous visualisation of the term’s meaning in the media, seems to have escaped the effect of rendering the term sexual harassment a “toothless tiger”. Or rather, because the phrase *taharrush jinsī* unambiguously refers to behaviours that inflict severe damage or harm, it was a strikingly negative “cassette” from the outset. All conduct associated with the term reflects, in the dominant understanding of the concept in Egyptian society, “behaviours that inflict severe damage or harm” and “criminal offences”. This is no doubt a major result of campaigns, such as the video series by Harass-Map, which amply illustrate the strategic framing and its effectful diffusion into public discourse. The weight of the term *taharrush jinsī* as denoting something seriously offensive was thus sustained and has hitherto remained.

Having tracked the cassette effect for the transliteration/translation words in Japan and Egypt, it remains to be examined if a particular effect also applies to the trajectory of the term sexual harassment in the United States. At first glance, even when no translation has taken place, a cassette effect may be diagnosed. Lin Farley lamented that the term “sexual harassment”, which once shocked and offended people, has evolved into a common, toothless expression used as a legal term and incorporated in anti-harassment manuals. Her call to bring the term back to its original meaning as “the ugly thing”, by accompanying it with offensive and damaging details of sexual harassment (Farley 2017), indicates that the English-language term has also become a “cassette” that attracted people with the vague expectation that it must contain some important meanings, but lacked the necessary framing and discursive power in order to convey its actual significance.

Conclusion

In this research note, the emergence and subsequent framing of a new concept, sexual harassment, has been examined in three societies where sex-based offences occur frequently. The term was coined to semantically designate a serious offence and violation of women’s rights. Naming and conceptualising it served to give victims of sexual abuse the vocabulary to describe their experiences. Applying the concept made it possible to define the locus of the problem and allowed for discussion of something previously considered inevitable and unpreventable – despite victims’ feelings of frustration, unhappiness, anger and pain. While appreciating this success, the original advocates of the term in both the US and Japan complain that it has lost most of its power and ultimately failed to bring about the desired change in perception. However, in Egypt, where the translation was not only selected in consideration of the local context, but strategically framed by strong advocacy groups, it appears that the moral power of the words still holds weight.

What insights can be drawn from these cases? Two inferences for further research arise. First, mobilising an effective movement can be facilitated by strategically translating and framing the concept, as illustrated in the Egyptian case. Second, strategic framing requires using a translation that evokes negative affective reactions *and* sustaining this negative connotation through media work and other public activities. This way of framing the concept eventually rendered the Egyptian anti-sexual violence movement more effective than its counterpart in Japan.

More research needs to be done in analysing the trajectories of perceptions of concepts and their relation to movement activists and advocacy groups. Recent initiatives in the US and in Japan suggest that both activists and scholars are more likely to use terms such as sexual violence (*seiboryoku* in Japanese), sexual abuse (*seiteki gyakutai*) or sexual assault (*seiteki kigai*) instead of sexual harassment to emphasise the gravity of the matter. Also, there are tendencies in both societies that movements now focus on, or move voluntarily towards, the articulation of details of a particular offence. Since the very beginning of the #MeToo movement in the US, some people have posted on social media, under the #MeToo hashtag, details and feelings of the harm they have encountered. In many cases, they have disclosed information never previously revealed to anyone (Gilbert 2017, CBS 2017). In Japan, a movement called the “Flower Demo” started in the spring of 2019, when several individuals accused of sexual harassment were found not guilty by the courts. During demonstrations against these verdicts and against sexual assaults in general, participants voluntarily spoke out about their own experiences and feelings, again, in many cases, for

the first time in their lives (for details see Flower Demo 2023). What changes these recent initiatives will bring about will be the next trajectory to be observed and analysed.

References

- Abdelmonem, Angie (2016): Anti-Sexual Harassment Activism in Egypt: Transnationalism and the Cultural Politics of Community Mobilization. PhD thesis, Arizona State University.
- Abdelmonem, Angie / Bavelaar, Rahma Esther / Wynne-Hughes, N Elisa / Galán, Susana (2016): The ‘Taharrush’ Connection: Xenophobia, Islamophobia, and Sexual Violence in Germany and Beyond, in: *Jadaliyya*. <https://www.jadaliyya.com/Details/33036> (accessed 13 July 2023).
- Akimoto, Tatsuru (1989): America ni miru sekushuaru harasumento: Nihon dewa do susunde ikuka (Sexual Harassment in the US: How Does the Situation in Japan Progress). *Rodo horitsu jumbo* (Labour Law Journal) 1228, pp. 22–31.
- Al-Barbarī, Muḥammad Sayyid Aḥmad / al-Minshāwī, Ashraf al-Jawharī (eds.) (2014): *Qānūn al-‘uqūbāt al-miṣrī* (Egyptian Penal Law). Cairo: al-Maṭābi‘ al-Amīriya.
- Al Malky, Rania (2007): Blogging for Reform: The Case of Egypt, in: Arab Media & Society. <https://www.arabmediasociety.com/blogging-for-reform-the-case-of-egypt/> (accessed 13 July 2023).
- Ancheta, Angelli Camille P. (2018): No Place for Harassment: Construing Street Harassment as Gender-Based Sexual Violence and Providing Remedies Therefor. *Ateno Law Journal* 63, pp. 539–648.
- ‘Azzām, Muḥammad (2008): al-Sijn al-mushaddad 3 sanawāt li-l-muttaham fī awwal qaḍīya taḥarrush jinsī fī tārikh al-qaḍā’ al-miṣrī (Three Years in Prison with Hard Labour for the Accused in the First Sexual Harassment Case in the History of the Egyptian Judiciary), *al-Miṣrī al-Yawm*, 22 October.
- ‘Azzām, Muḥammad / Farghalī , Dārīn (2008): Nuḥā Rushdī ṣāḥiba awwal da‘wā «taḥarrush jinsī» (Noha Roshdi: The First Plaintiff of “Sexual Harassment”), *al-Miṣrī al-Yawm*, 23 October.
- Baalbaki, Rohi (2002): *Al-Mawrid: A Modern Arabic-English Dictionary*. Beirut: Dar El-Ilm Lilmalayin.
- Buḥayrī, Aḥmad Muḥsin Aḥmad / al-Minshāwī, Ashraf al-Jawharī (eds.) (2017): *Qānūn al-‘uqūbāt al-miṣrī* (Egyptian Penal Law). Cairo: al-Maṭābi‘ al-Amīriya.
- CBS (2017): More than 12M “Me Too” Facebook posts, comments, reactions in 24 hours, CBS NEWS, 17 October. <https://www.cbsnews.com/news/metoo-more-than-12-million-facebook-posts-comments-reactions-24-hours/> (accessed 13 July 2023).
- Diyāb, Muḥammad (2010): 678. New Century Production.
- ECWR (2008): *Ghuyūm fī samā’ miṣr: al-taḥarrush al-jinsī min al-mu‘ākasāt al-kalāmīya hattā al-ightiṣāb*, “*dirāsa sūsiyūlūjīya*” / “*Clouds in Egypt’s Sky*” *Sexual Harassment: From Verbal Harassment to Rape, A Sociological Study*. Cairo: ECWR. (Summaries can be obtained from the following websites: <https://manshurat.org/node/23126> (Arabic); http://www.endvawnow.org/uploads/browser/files/ecrw_sexual_harassment_study_english.pdf.pdf (English), accessed 13 July 2023).
- Farley, Lin (1978): *Sexual Shakedown: The Sexual Harassment of Women on the Job*. New York: McGraw-Hill.
- Farley, Lin (2017): I Coined the Term ‘Sexual Harassment.’ Corporations Stole It, *The New York Times*, 18 October. <https://www.nytimes.com/2017/10/18/opinion/sexual-harassment-corporations-steal.html> (accessed 13 July 2023).
- Fileborn, Bianca / Loney-Howes, Rachel (2019): *#Me Too and the Politics of Social Change*. Cham: Palgrave Macmillan.
- Flower Demo (2023): Flower Demo, official website, <https://www.flowerdemo.org/english> (accessed 13 July 2023).

- Fukushima, Mizuho (1989): Sekushuaru harasumento to ho: Genkoho ni okeru ichizuke to kongo no kadai (Sexual harassment and the law: Locating sexual harassment in the existing law and issues for the future). *Rodo horitsu jumpo* (Labour Law Journal) 1228, pp. 16–21.
- Gieseler, Carly (2019): *The Voices of #Me Too: From Grassroots Activism to A Viral Roar*. Lanham: Rowman & Littlefield.
- Gilbert, Sophie (2017): The Movement of #MeToo: How a hashtag got its power. *The Atlantic*, 16 October. <https://www.theatlantic.com/entertainment/archive/2017/10/the-movement-of-metoo/542979/> (accessed 13 July 2023).
- HarassMap (Kharīta al-Taḥarrush) (2014a): ‘al-Mutaharrish Mujrim (Harasser is a Criminal)’ YouTube video. <https://youtu.be/m7VZUAGpyZ8> (accessed 13 July 2023).
- HarassMap (Kharīta al-Taḥarrush) (2014b): ‘Khamisa sinīn... Kharīta al-Taḥarrush (Five Years with HarassMap)’ YouTube video. <https://youtu.be/wPZgUwxQCP0> (accessed 13 July 2023).
- Harayama, Yohei (2011): *Seku-hara no tanjo: Nihon joriku kara genzai made (The Birth of Sexual Harassment: From arrival in Japan to the present)*. Tokyo: Tokyo shoseki.
- Haruno, Mayumi (2001): *Saraba, genkoku A ko: Fukuoka sekushuaru harasumento saiban shuki (A Farewell to Plaintiff Ms. A: A Note on the Fukuoka Court Case on the Sexual Harassment)*. Fukuoka: Kaichosha.
- Hillstrom, Laurie Collier (2019): *The #Me Too Movement*. Santa Barbara: Abc-Clio.
- Hong, Khuat Thu (2004): Sexual Harassment in Vietnam: A New Term for an Old Phenomenon. In: Lisa Drummond / Helle Rydstrom (eds.): *Gender Practices in Contemporary Vietnam*. Singapore: Singapore University Press, pp. 117-137.
- Kreil, Aymon (2016): Finding Words for Sexual Harassment in Egypt: The Vicissitudes of Translating a Legal Category. Ethan Rundell (trans.). Original paper : Aymon Kreil, «Dire le harcèlement sexuel en Égypte: les aléas de traduction d’une catégorie juridique». *Critique internationale* (70), pp. 101–114.
- Kyodo News (2018): Japan’s finance minister repeats controversial comment on sexual harassment, *Kyodo News*, 8 May. <https://english.kyodonews.net/news/2018/05/4da621915c69-japan-minister-repeats-controversial-comment-on-sexual-harassment.html> (accessed 13 July 2023).
- MacKinnon, Catharine A. (1979): *Sexual Harassment of Working Women: A Case of Sex Discrimination*. New Haven / London: Yale University Press.
- McLain, Lynn (1981): The EEOC Sexual Harassment Guidelines: Welcome Advances under Title VII? *University of Baltimore Law Review* 10 (2), pp. 275–337.
- MORE (1989): Mo yurusenai! Zittai sekushuaru harasumento (We will not tolerate it anymore! The reality of sexual harassment), *MORE*, 6 June, pp. 253–262.
- NHK (2018): “Seku-hara zai ha nai” ‘Zijitsu nobeta’ Aso-shi (Mr. Aso “There is no seku-hara charge” “Stated fact”), *NHK Seiji Magazin (Political Magazine)*, 8 May. <https://www.nhk.or.jp/politics/articles/statement/4215.html> (accessed 13 July 2023).
- On the Media (2017): Sexual Harassment, Revisited, in: *On the Media*, 28 October. <https://www.wnycstudios.org/podcasts/otm/segments/sexual-harassment-revisited> (accessed 13 July 2023).
- Rizzo, Helen / Price, Anne M. / Meyer, Katherine (2012): Anti-sexual Harassment Campaign in Egypt. *Mobilization* 17(4), pp. 457–475.
- Saguy, Abigail Cope (2000): *Defining Sexual Harassment in France and the United States 1975–1998*. PhD Dissertation, Princeton University.
- Saguy, Abigail Cope (2003): *What is Sexual Harassment? From Capitol Hill to the Sorbonne*. Berkeley / Los Angeles / London: University of California Press.
- Suchland, Jennifer Anne (2005): *On the Transnational Trouble with Gender: The Politics of Sexual Harassment in Russia*. PhD Dissertation, The University of Texas at Austin.
- Suchland, Jennifer Anne (2008): Contextualizing Discrimination: The Problem with Sexual Harassment in Russia. *Journal of Women, Politics & Policy* 29(3), pp. 335–363.

- Tadros, Mariz (2016): *Resistance, Revolt, & Gender Justice in Egypt*. NY: Syracuse University Press.
- Takemura, Kazuaki (2021): Sekushuaru harasumento no genbatsu ka: 2021 nen 8 gatsu no ejiputo keiho kaisei no naiyo to haikai (Severer Punishment for Sexual Harassment: The Content and Background of a Partial Amendment to the Egyptian Penal Code in August 2021). *The Takachiho Ronso* 56(3) pp. 95–118.
- Tsunoda, Yukiko (2018): Seku-hara mondai no 30 nen (30 years of Sexual Harassment Issue). Lecture at Japan National Press Club, 25 June. <https://www.youtube.com/watch?v=wicF5muXXbM&feature=youtu.be> (accessed 13 July 2023).
- Tsunoda, Yukiko (2019): Ima, naze, sekushuaru harasumento ka: shokuba no sekushuaru harasumento saiko (Why Should We Talk About Sexual Harassment Now? Rethinking Sexual Harassment at the Workplace). *NWEC Zissen Kenkyu (Practical Research)* 9, pp. 54–74.
- US District Court for the District of Columbia (1976): *Williams v. Saxbe*. 413 F. Supp. 654, 20 April.
- U.S. Equal Employment Opportunity Commission (1990): Enforcement Guidance (Policy Guidance on Current Issues of Sexual Harassment, N-915-050).
- Yamazaki, Fumio (2000): *Sekushuaru harasumento no hori (Jurisprudence of Sexual Harassment)*. Tokyo: Sogo rodo kenkyu syo.
- Yanabu, Akira/ Gaubatz, Thomas/ Haag, Andre (2008): Translation Words: Formation and Background (excerpt). *Review of Japanese Culture and Society* 20, pp. 47–70.
- Yanabu, Akira (2009). Translation in Japan: The Cassette Effect. *TTR: traduction, terminologie, rédaction* 22(1), pp. 19–28.
- Yanabu, Akira (2011). *Honyaku toha nanika: Nihongo to honyaku bunka (What is Translation: Japanese Language and Translation Culture)*. Tokyo: Hosei Daigaku Shuppanyoku (First Published in 1976).
- Yanabu, Akira (2013). *Honyaku bunka wo kangaeru (Thinking of Translation Culture)*. Tokyo: Hosei Daigaku Shuppanyoku (First Published in 1978).
- Zippel, Kathrin S. (2006): *The Politics of Sexual Harassment: A Comparative Study of the United States, the European Union, and Germany*. Cambridge: Cambridge University Press.