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Islam & Fashion: a modesty-driven combination.

di Anna Marotta

(Abilitata Professore Associato di Diritto Comparato)

Sommario

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Abstract

Muslims are required to abide by Islamic teachings also when it comes to clothing. Fashion must be *halal*, that is to say 'permissible', in Islam. However, *halal* fashion is an heterogeneous category whose content relies on different interpretations of *haya'*, a virtue that is generally translated as 'modesty. As a result, what is labelled 'modest fashion' is a growing market within which the plurality of readings makes Islamic fashion style a multi-faceted phenomenon both in Islamic countries and among Muslim communities in the West, where it enters the courtrooms and gives rise to geopolitical antagonisms.

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1. Introduction: Islam as a driver of a fashion market.

"It is commonly assumed, particularly in the West, that Muslim women are indifferent to fashion"[1]. And yet, Islamic fashion is growing in popularity, gaining an increasing worldwide market share. "Clothing has a comparable element in accordance with Islamic principles, similar to how some items are regulated by Islam"[2]. Clothing still is, in some respects, a normed reality[3], and this seems to be particularly (and legally) true in Islam, at least according to certain interpretations of *sharia*, the revealed divine law which states that even what Muslim wear is to be '*halal*', that is compatible with God's Word[4]. However, Muslims do not agree on what is meant by *halal* clothing. Islamic styles of clothing reflect many variables: level of religiosity, ethnicity, race, gender, class, generation, political context, cultural capital, community norms, family ties, professional and social environments, intersections and overlapping between different affiliations, intercultural contacts, personal history, pop culture, social media, fashion trends, individual aesthetics, practical considerations, transnational links, colorism, social pressure, ideological divisions, specific sensibilities. As a result, The general drive for homologation within the *umma*, which does not spare this aspect of the Muslim believer's life, ends up clashing with a plurality of interpretations of Islamic clothing rules that come not only from Muslim communities and individuals but also from scholars, producing a dispersal of religious authority that results in a confrontation between *ulama'* and new religious intellectuals[5]. As with other ambits of the daily living, Islamic clothing is in fact the subject of several legal non-binding opinions from religious authorities (*fatawa*), who are often self-taught people having a different relationship with changes in time and space. Some of these opinions are crystalized in the seventh century Arabia, revealing a literalist interpretation of Islamic sources, whilst others are more or less open to *ijtihad* (interpretative effort), trying to cater to the needs of a fast changing society. But there is more to that: regardless of the content, legal responses are increasingly conveyed by technological tools, adding confusion to uncertainty. Online *fatawa* comes not only from official institutions. They are issued

[1] F. SHIRAZI, *Brand Islam: The Market and Commodification of Piety*, University of Texas Press, Austin, 2016, p. 144.

[2] H. MOHI-UD-DIN QADR, *The Global Halal Industry: A Research Companion*, Islamic Business and Finance Series, Routledge, London, 2024, p.141.

[3] The legal side of fashion is extensively addressed in B. POZZO - V. JACOMETTI (eds), *Fashion Law: Le problematiche giuridiche della filiera della moda*, Giuffré, Milano, 2016, within which, *see* in particular R. PALAVERA, *Abbigliamento, Diritto e Marginalia*, p. 280.

[4] On the relationship between Islam and fashion please refer to A. MAROTTA, *Halal Fashion Revolution: un business nel segno della modestia*, in S. LANNI (a cura di), *La tutela del consumatore nella prospettiva halal tra sfide e opportunità del mercato europeo*, Milano University Press, 2025, pp. 155-181.

[5] E. GIUNCHI, *La dispersione dell'autorità religiosa nell'Islam contemporaneo: dai tribunali al web*, Memoria della Accademia delle Scienze di Torino, Classe delle Scienze Morali, Storiche e Filologiche, Serie V, 38, 1/2014, pp. 24-31.

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also by individuals who, in a personal capacity, provide their own interpretation of Islamic norms. Faced with Muslim 'costumers'' need to have *sharia*-compliant products in every area of life, clothing included, web becomes a sort of moral guide for Muslims, especially in Western countries, where they are subtracted to traditional monitoring mechanisms. Through horizontal forms of communications, web voices challenge vertical transmission-based traditional religious authority, official interpretations of Islam conveyed through the codes male authority within the family and power systems at national and international level.[6] This exegetical drift by a part of the religious establishment allows Islam to keep up with times and adjust to geographical context, on the one hand. On the other hand, however, the end of the authority-based historical relationship between those who request a *fatwa* and those who issue it – whose anonymity makes it impossible to ascertain the *mufti's* skills – gives rise to a competition between 'experts' who pretend to represent the 'correct' Islam[7]. Such 'hermeneutics of despotism'[8] in which each scholar tries to impose his opinion as the only valuable opinion, makes Islam an '*Islam à la carte*'[9], which is globalized as it is untied from a specific territory, but also simpler, since it lacks all the complex shades of classical Islam, 'cool' in so far as it is interpreted in a modern way, and, finally, less strict than political Islam and less boring than *ulama*'s erudite Islam[10]. At the same time, it allows modernity to enter an increasingly desacralized religion, with the result that Islamic ethics becomes part of the cultural globalization process[11]. This is especially evident for those aspects that bring into play the social sphere. Clothing is one of them. This identity marker is expression and instrument of both encounter and clash between Islam and the West and between traditional Islam and modern Islam. 'Islamic fashion' contaminates itself through the contact with different cultures, be it either direct or indirect, physical or virtual. Regardless of whether this contact produces a traditional conservative style or results in a hybrid modern style, the starting point remains the same: "brand Islam has initiated marketing campaigns in the realm of women's fashion that capitalize on the very core of Islamic precepts: Sharia"[12].

2. The virtue of haya' behind Islamic fashion.

[6] E. GIUNCHI, *La dispersione dell'autorità religiosa nell'Islam contemporaneo*, p. 25.
[7] E. GIUNCHI, *La dispersione dell'autorità religiosa nell'Islam contemporaneo*, p. 40.
[8] K. M. ABOU EL FADL, *And God Knows the Soldiers. The authoritative and authoritarian in Islamic discourse*, University Press of America (Revised edition), Lanham, MD, and Oxford, 2001, p. 94.
[9] O. ROY, *Secularism and Islam: The theological predicament*, in *The International Spectator*, 48, 1/2013, p. 15.
[10] A. BOUBEKEUR, *Cool and competitive. Muslim culture in the West*, in *Isim Review*, 16, 2005, p. 12.
[11] E. GIUNCHI, *La dispersione dell'autorità religiosa nell'Islam contemporaneo*, pp. 39-42.
[12] F. SHIRAZI, *Brand Islam*, p. 144.

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There is something about clothing that cuts across legal traditions: it delimits, protects, mediates interaction, conveys a message and express a distinctive identity[13]. "Fashion is a kind of communication in which clothing acts as a visual reflection of a person' s social status and personal value. Its significance goes beyond simple fashion and style; it expresses the belief of a particular group or church. Clothing has the ability to highlight and signify one's individuality. Fashion, in essence, serves as a non-verbal manner of communicating an individual's or a group's views, preferences, and ideas" [14]. This is also true for Islam, where the need to combine Islamic affiliation and passion for fashion has produced a new label: 'modest fashion'. Although this expression may seem an oxymoron, it arises out of the business language and seems to be designed to make Islamic/*halal* fashion strategically more inclusive. "Using Islam as a portal for selling modest but highly stylish attire has proven a shrewd business decision"[15], indeed. Modest fashion market is an industry that is rapidly prospering under the influence of Millennials and Gen Z, who don't want to give up being fashionable while respecting Islamic teachings.

It is especially Muslim women who are called upon to modestly dress. And yet, although "Islamic clothing is indeed designed with modesty in mind, Muslim women pay as much attention to beautiful presentation as women in the west o and are highly attuned to style and fashion"[16].

In Islam modesty is known with the Arabic term '*haya'*, a virtue that embraces more than outward behavior up to covers interior intentions. *Haya'* encompasses all elements of life, including interactions and clothes. Unlike some terms that have a legal meaning distinct from their general usage in classical Arabic, *ḥaya'* doesn't have not any technical meaning other than ordinary usage in legal works[17]. *Haya'* refers to "a comprehensive notion that includes humility, self-respect, bashfulness, and shyness. It signifies decency and reserve, both in appearance and in behavior, with the goal of preserving one's dignity and moral principles"[18]. According to some scholars, the word *haya'* is translated as 'shame' in so far as it brings together the English terms 'modesty', 'bashfulness', and 'even inhibition': indeed "modesty (in the sense of avoiding excessive physical or social self-display) is only one instantiation of the word's broader reference to an aversion to performing

[13] R. PALAVERA, *Abbigliamento, Diritto e Marginalia*, p. 281.
[14] H. MOHI-UD-DIN QADR, *The Global Halal Industry*, p. 142.
[15] F. SHIRAZI, *Brand Islam*, p. 144.
[16] F. SHIRAZI, *Brand Islam*, p. 144.
[17] M. H. KATZ, *Shame* (al-haya') *as an affective disposition in Islamic legal thought*, in *Journal of Law, Religion and Thought*, 2014, p. 142.
[18] H. MOHI-UD-DIN QADR, *The Global Halal Industry*, p. 142.

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inappropriate actions" [19]. 'Bashfulness', in a similar way, should be seen as a specific and intense manifestation of *ḥaya*[20]. The word *haya'* might be termed as 'anticipatory shame', that is "a person's visceral awareness of the ignominy that would result from an envisioned action (and resulting disinclination to perform it), rather than the feeling ensuing after the action is performed"[21]. So therefore, *haya'* might be also understood as the fear of social disapprobation.

The term *haya'* does not appear in the Qur'an, which uses the word *istihya'* – with a similar etymology and a similar meaning – to refer to the woman's modest movement in the *sura* 24 (*Al-Qasas*). Although at the time of the Prophet *haya'/istihya'* was understood as a predominantly female value and as such it has been passed down over the centuries, this behavioral trait is widely appreciated in men[22]. Not only modesty involves the Prophet indeed, but this virtue ethics is directly connected to God as example of virtuous behavior[23].

According to a line of thinking, *haya'* can be classified into: 1) *haya'* before God; 2) *haya'* towards others; 3) *haya'* of themselves[24]. The first category of *haya'* refers to the feeling caused by actions that displease God. *Haya'* towards others, instead, is what prevents people from harming one another and from performing indecent acts. The final *haya'* indicates a person's shame arising from performing improper acts.

The Islamic perspective of *haya'* involves five characteristics, namely: 1) lowering the gaze; 2) positive speech; 3) safeguarding one's chastity/dignity; 4) being aware/sensitive to the judgement of others, and 5) modest self-representation[25]. The first characteristic requires Muslims to lower their gaze in order to avoid looking at prohibited things. This characteristic is closely linked to the need to safeguard one's chastity. In principle, both men and women have to safeguard their chastity, and their behavior depends on the way they offer themselves to prying eyes, but also, and especially, on the way they do avoid prying eyes. As a matter of fact, however, it is the good Muslim woman, in particular, who is called to refrain from turning her gaze to peoples' body parts that are *haram*, much more than protecting herself from the gaze of others[26]. Safeguarding one's chastity is also related to the rules of

[19] M. H. KATZ, *Shame* (al-haya') *as an affective disposition in Islamic legal thought*, p. 143.
[20] A. W. BOULANOUAR, *The notion of modesty in Muslim women's clothing: an Islamic point of view*, in *New Zealand Journal of Asian Studies*, 8(2), 2006, pp. 134-156.
[21] M. H. KATZ, *Shame* (al-haya') *as an affective disposition in Islamic legal thought*, p. 143.
[22] I. ZILLO-GRANDI, *Modestia, pudicizia e riserbo*, pp. 174-175.
[23] I. ZILIO-GRANDI, *Modestia, pudicizia e riserbo*, p. 172.
[24] R. P. SAWAI - N. JAAFAR - S. M. NOAH - S. E. KRAUSS, *Inculcating the Sense of Modesty (Al-Haya') in Youth from the Perspectives of the Quran and Sunnah*, in *Journal of Ma'alim al-Quran wa al-Sunnah*, 16 (2), 2020, p.19.
[25] R. P. SAWAI - N. JAAFAR - S. M. NOAH - S. E. KRAUSS, *Inculcating the Sense of Modesty (Al-Haya') in Youth from the Perspectives of the Quran and Sunnah*, p. 20.
[26] I. ZILIO-GRANDI, *Modestia, pudicizia e riserbo*, p. 172.

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gatherings and meeting or mixing of men and women with the aim to protect family lineages. Muslim men and women must observe gender boundaries in case people involved are not *mahram* (ineligible for marriage to each other).

Another characteristic of Muslims with *haya'* is that their speech must be positive. A lack of verbosity is a form of modesty. The importance of good speech has to do with guarding one's tongue from any evil. Acts such as disparaging others, laughing at their weaknesses, humiliating them, forswearing, giving lewd speeches, are prohibited in Islam.

Being aware of others' judgment is a further aspect of *haya'*. Shame is the feeling of embarrassment when people see and judge the improper things – for example, performing intimate acts in public. In other words, scrutiny by others serve as a social signal because it actually deters people from doing them.

Those possessing *haya'* also need to modestly present themselves. Both sexes are obliged to wear clothes based on the Quranic standards of modesty. The concept of modesty is addressed from many angles. In physical terms, modesty is connected with the *awra'*, an Arabic word which indicates those body parts that are not allowed to be shown[27]. For men, the *awra'* is from the navel to the knee. For women, the *awra'* is more extensive and a more complicated matter[28]. There is no agreement among Muslim scholars on "whether her *awra'* [author's note] is her whole body except her face and palm, or her *awra'* [author's note] is her whole body except her face, palm and feet or her *awra'* [author's note] is her whole body including her face"[29]. Style of coverage varies greatly from country to country and person to person accordingly, making a specific piece of clothing, the veil, a central focus of modest clothing.

3. Modest fashion around the world.

Although in Islam, "veiling is used to hide a woman's awrah, which goes beyond a simple head covering and transcends transitory fashions"[30], "head covering has been practiced throughout history; even civilizations such as Greece and Persia had a preference for veiling. The veil represented respect and nobility in Persian culture, and it was worn by all women regardless of marital status. In Greek culture, veiling was associated with menstruation and had theological implications. Prior to Islam,

[27] Y. AL-QARADAWI, *The Lawful and the Prohibited in Islam*, Al-Falah Foundation For Translation, Publication and Distribution, p. 150.
[28] A.W. BOULANOUAR, *The notion of modesty in Muslim women's clothing*, p. 135.
[29] N. HASMAD - A. ALOSMAN, *Cloth of Fame (Thaub As-Syuhrah) in Islam*, cit., p. 304.
[30] H. MOHI-UD-DIN QADR, *The Global Halal Industry*, p. 142.

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Arab civilization had the notion of veiling, albeit it was more about covering the head and the less about covering the full body"[31].

The most popular Islamic veil is known as *hijab*, a scarf that is wrapped around the head, covering the hair, neck, and ears while leaving the face visible. In addition to *hijab*, here are further types of Islamic veil: 1) *niqab*, a veil which covers the face and leaves the area around the eyes clear; 2) *burqa*, a one-piece veil which covers both face and body, often leaving just a mesh screen to see through; 3) *shayla*, a long rectangular scarf wrapped around the head and tucked or pinned in place at the shoulders; 4) *al-amira*, a two-piece veil that consists of a close fitting cap, usually made from cotton or polyester, and a tube-like scarf; 5) *khimar*, a long cape-like veil that hangs down to just above the waist and covers the hair, neck and shoulders completely but leaves the face clear; 6) *chador*, a full-body cloak, often accompanied by a smaller headscarf underneath; 7) *tudung/kerudung*, Malay term for a veil that is worn over the head to cover the hair, neck and chest areas while leaving the face exposed and which is common to call *kerudung* in Indonesia.

"On the one hand, the veil is a simple garment, one which millions of women deal with in their daily lives as a matter of habit, without a second thought. They are raised to wear it; it is just another article of clothing. On the other hand, the veil is an enormously important symbol, as it carries out thousands of years of religious, sexual, social, and political significance within its folds. Its original purpose, to separate respectable women from slaves, prostitutes, and women with low social status, has been blurred to a point at which it has different meanings to different people in different cultures, and even in the same culture"[32]. But how do Islamic law sources regulate the issue of veil? Are we sure that Muslim women must wear it? If so, what kind of veil are they supposed to wear according to Islamic rules? The Qur'an refers to veiling in *sura* 24 (*An-Nur*), verse 31, and *sura* 33 (*Al-Ahzab*), verse 59. Nonetheless, dress requirements seem to shift for a woman as she advances in age, probably because of the fact that aging makes women less attractive and seductive, and, thus, less likely to incite *fitna*. Religious authorities, for their part, take different positions about the veil. Elements such as contaminations deriving from local traditions and culture and political influences play a significant role in inspiring different readings of Islamic rules . The veil becomes either a necessary part or an optional element of modest fashion accordingly.

The marketing and commodification of Islamic piety as modest fashion was not born in conjunction with the first events designed to celebrate Islamic style such as the

[31] H. MOHI-UD-DIN QADR, *The Global Halal Industry*, p. 142.
[32] F. SHIRAZI, *Brand Islam*, pp. 151-152.

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'Arab Fashion Week'[33]. It was only in 2016 that Istanbul hosted the first-ever edition of the Modest Fashion Weeks series[34]. In 2018 it was the turn of 'Prêt-A-Cover Buyers Lane: A Modest Revolution'[35], a fashion event organized by the Islamic Fashion and Design Council (IFDC)[36] where designers exhibited their modest wear collections without the use of a catwalk.

Initiatives for the development of modest fashion have multiplied over the ideas. Suffice it to mention the Muffest (Muslim Fashion Festival), one of the programs of the Indonesian Fashion Chamber (IFC)[37], the Modest Fashion Academy[38] set up by fashion designer, businesswoman, instructor and entrepreneur Rabia Zargarpur[39], and modest fashion malls such as the Zeruj Port Shopping Mall in Istanbul[40].

Turning the eyes to the western world, it took its first steps into the modest clothing in 2014. The first fashion brand who showed a collection of modest clothes was DKNY[41]. The Ramadan Collection paved the way to capsule collections by Tommy Hilfiger, Oscar De La Renta, Prada, Dior, Victoria Beckham, Yohji Yamamoto, Max Mara, Jimmy Choo, Valentino, Stella McCarthy, Etro and pop brand such as Zara, H&M, Mango and Uniqlo.

One of the clearest examples of an attempt at promoting an encounter between the Islamic understanding of fashion and western trends was Dolce & Gabbana's 2016 *hijab* and *abaya* collection, with respect of which it is stated: "the garments, while engineered for modesty, have all the flair of any other Dolce & Gabbana collection – a little jewel-encrusted lemon here, some black lace trim there – and are styled alongside the label's cocktail jewelry, oversize sunglasses, and patterned bags in a lookbook shoot"[42].

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[33] The 'Arab Fashion Week' was launched in 2015 by the Arab Fashion Council, not-for-profit organization set up in London in 2014 to establish a comprehensive fashion system unifying the 22 Arab countries under a single umbrella. The 'Arab Fashion Week' was later rebranded as 'Dubai fashion Week' and co-founded by Dubai Design District (d3) making it the official fashion week of Dubai. *See* https://arabfashioncouncil.com/.

[34] https://www.modestfashionweeks.co/events/2016-istanbul-modest-fashion-week

[35] https://www.youtube.com/watch?v=JFkyGKZeWdg; https://www.youtube.com/watch?v=_SIJEJJOcSo; https://www.youtube.com/watch?v=ZkQh6u8B70M&t=12s.

[36] Founded by Alia Khan, the IFDC is a modest fashion and design council representing the Islamic economy and its stakeholders.

[37] https://muslimfashionfestival.com/

[38] https://www.instagram.com/modestfashionacademy/

[39] https://www.rabiaz.com/

[40] https://www.instagram.com/zerujport/?hl=it (ultimo accesso 21 giugno 2024).

[41] B. SHAH, *DKNY's Ramadan collection shows that Muslim dress means more than the burqa*, *The Independent*, 3 July 2014, https://www.independent.co.uk/voices/comment/dkny-s-ramadan-collection-shows-that-muslim-dress-means-more-than-the-burqa-9579469.html.

[42] S. YOTKA, *Dolce & Gabbana's Embellished Hijabs and Abayas Are Great News for Muslim Women – When Will Other Brands Follow Suit?*, *Vogue*, 5 January 2016, https://www.vogue.com/article/dolce-gabbana-hijab-abaya-collection.

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One year later, after some criticism by Muslim women – who had declared : "the D&G collection may be appropriate for Eid, but we exist the other 11 months of the year. And some of us cannot afford couture"[43]– , Nike launched the first sporting *hijab* [44] and London hosted the first 'Modest Fashion Week', which was described as "fashion shows with models in burkinis and hijabs, and a burqa-clad designer pitching her clothing line to the Dragon's Den of the fashion world"[45].

Modest fashion was also the protagonist of the 'Contemporary Muslim Fashions', a museum exhibition at the Cooper Hewitt Smithsonian Design Museum in New York, which was first inaugurated in 2019 to explore the nature of the modest fashion industry[46], and the subject of 'the Turin Modest Fashion Roundtable' in 2015, when Italian fashion businesses and designers met with counterparts from over 20 countries representing the Islamic fashion industry to discuss trends and needs in the sector[47].

Fashion magazines contribute to the spread of modest fashion, too. While Vogue Arabia promotes luxury modest fashion, it was Allure that first dedicated its cover to the model Halima Aden wearing the *hijab*[48], followed by British Vogue[49]. She was also the first Muslim model to appear in Sports Illustrated wearing a *burkini*[50].

Other examples of an encounter between Islam and the West in the fashion industry are the H&M 2015 campaign for sustainable fashion titled 'Close the loop,' which originally featured English model Lalla Mariah al Idrissi wearing both *hijab* and nose

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[43] F. MARINI, *The Dolce & Gabbana abaya collection won't ease shopping while Muslim*, *The Guardian*, 7 January 2016, https://www.theguardian.com/commentisfree/2016/jan/07/the-dolce-gabbana-abaya-collection-wont-ease-shopping-while-muslim.

[44] BBC, *Nike becomes first major brand to launch hijab for women*, 8 March 2017, https://www.bbc.com/news/newsbeat-39205965.

[45] A. KHAN, *Generation M: how young Muslim women are driving a modest fashion revolution*, *The Guardian*, 22 February 2017, https://www.theguardian.com/fashion/2017/feb/22/generation-m-how-young-muslim-women-are-driving-a-modest-fashion-revolution.

[46] https://www.cooperhewitt.org/channel/contemporary-muslim-fashions/. The exhibition also conveyed political messages, as evidenced by the dress 'US Constitution and First Amendment' by Lebanese Céline Semaan Vernon for Slow Factory. The First Amendment to the United States Constitution guarantees freedom concerning religion, expression, assembly, and the right to petition.

[47] IL TORINESE: QUOTIDIANO ONLINE DI INFORMAZIONE SOCIETÀ CULTURA, *Moda islamica: un settore in crescita*, 29 July 2015, https://iltorinese.it/tag/turin-modest-fashion-roundtable/.

[48] K. MENZA, *"Destroyer of Stereotypes" Halima Aden Just Landed Her First Major Beauty Magazine Cover*, *Cosmopolitan*, 20 June 2017, https://www.cosmopolitan.com/style-beauty/a10161271/halima-aden-allure-cover-hijab-model-american-issue/.

[49] E. PITHERS, *Meet Halima Aden, The First Hijabi Model On The Cover Of Vogue*, *Vogue world*, 19 April 2018, https://www.vogue.co.uk/article/halima-aden-interview-2018.

[50] R. SINI, *Sports Illustrated features first burkini girl, BBC*, 29 April 2019, https://www.bbc.com/news/48071948.

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ring[51], and the *Modest Fashion Pop-Up* live scheduled for October 2025 at the Novotel London West, which will showcase 50 designers from around the globe[52].

The growth of modest fashion market goes hand in hand with the development of modeling agencies and a dedicated e-commerce sector, especially in Western countries where it may be more difficult to find Muslim traditional clothing in retail stores. From Modanisa to The Modist, the web plays a significant role in spreading the phenomenon, thanks also to the contribution of content creators such as *fashion bloggers* and *influencers*, street style phenomena such as *hijabistas*[53] and subcultures such as *mypsterz*[54].

In the light of the above, religion and style become an indissoluble combination in modest fashion. And yet, what modest fashion exactly is and how much of it can be considered *halal* is interpreted in many ways. Is there a specific doctrine behind every designer? If so, does it depend on the country of origin or the destination market? Is there a link between the legal norm and the social norm? What is it? A further reflection arises from the fact that the legal act of dressing may also be an unlawful act, a crime, a sanction or a cautionary tale[55]. That is the reason why "Muslim women across the globe are challenging restrictions on Islamic dress and in some instances questioning the arbitrary rulings of religious authorities. In brief, they are pushing Islamically acceptable boundaries when it comes to fashion"[56]. Nonetheless, some argue that "Muslim women who wish to fulfil the parameters of *awra'* [author's note] covering must carefully observe that they do not get involved in status consumption or fashion uniqueness"[57] . Such a position is warranted emphasizing that "Islam states a clear and strict prohibition onto its believers from wearing clothes of fame […]. Clothes that are worn to gain fame, showing off and be magnified, can be identified by its distinguished features whether in terms of colour, shape or design that demonstrates either highend extravagance or low-end frugality which goes beyond the normal norm in the society that consequently made it a finger-pointing phenomenon"[58].

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[51] LA REPUBBLICA, *Mariah Idrissi, la prima modella con l'hijab in uno spot H&M*, 28 September 2015, https://video.repubblica.it/moda-e-beauty/moda/mariah-idrissi-la-prima-modella-con-l-hijab-in-uno-spot-h-and-m/380275/380988.

[52] https://www.modestfashionlive.com/.

[53] *Hijabistas* are young fashionistas that mix street fashion and influences from the catwalks with the Muslim *hijab*.

[54] The term '*mipsterz*' originated in 2012 with a small group of friends in New York who jokingly called themselves Muslim hipsters. They mesh Islam with their new world ideas adopted in the society of their family's new home to form a third culture: *mipster* (sub) culture.

[55] R. PALAVERA, *Abbigliamento, Diritto e Marginalia*, p. 280.

[56] F. SHIRAZI, *Brand Islam*, p. 173.

[57] N. HASMAD - A. ALOSMAN, *Cloth of Fame (Thaub As-Syuhrah) in Islam*, p. 314.

[58] N. HASMAD - A. ALOSMAN, *Cloth of Fame (Thaub As-Syuhrah) in Islam*, p. 314.

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The question then becomes how Islamic countries – which take different stances on the role of *sharia* and *fiqh*[59] in their system of sources – and Muslim communities in Western countries – which face different diversity policies –relate to the plurality of the existing interpretations of Islamic clothing rules.

4. Evolutions and revolutions of modest fashion

4.1. Fashion style between tradition and modernity in Islamic countries

In 2010, the Turkish newspaper *Milliyet* estimated that the Islamic clothing market to be worth around $ 2.9 billion[60]. In 2017, *halal* fashion was the second expenditure item for Muslims in the world after food, equal to € 238,4 billion[61]. According to the State of the Global Islamic Economy (SGIE) Report 2023/2024, by 2027 Muslim spend on apparel and footwear is forecast to reach $ 428 billion.

In current times, where people have easier access to online information, Muslim people are exposed to a multiplicity of stimuli through advertisements about fashion trends. Even in countries such as Iran, where Muslims have to wear a dress code that includes a *hijab* and loose-fitting clothing covering arms and legs[62], there are attempts at expressing some sort of creativity in style, if not a rejection of Islamic dress, as

[59] In explaining what *fiqh* is, Castro quotes the Tunisian Maliki scholar Ibn Khaldun, who asserts that *fiqh* consists of extracting from the roots (*usul*) and sources, the norms (*ahkam*) relating to shariatic qualification of actions (*af'al*) of the *mukallaf*, namely the Muslim who is required to fulfil legal-religious obligations. Please *see* F. CASTRO, *Il modello islamico*, (ed. by G. M. PICCINELLI), 2nd edn, Torino, G. Giappichelli Editore, 2007, p. 9.

[60] F. SHIRAZI, *Brand Islam*, p. 144.

[61] C. BEGHELLI - M. CASADEI, *Modest fashion: la moda islamica cresce sotto la spinta dei Millenial*, *Il Sole 24 ore*, 3 November 2018, https://www.ilsole24ore.com/art/modest-fashion-moda-islamica-cresce-sotto-spinta-millennial--AEmFHyYG.

[62] Iran's National Security Council has paused the implementation of "Law on Protecting the Family through the Promotion of the Culture of Chastity and Hijab", which should have come into force on 13 December 2024. The law, containing 74 articles, was drafted by the judiciary in May 2023 in response to widespread defiance of compulsory veiling by women and girls in protest at the death in custody of Jina Mahsa Amini, which sparked the "Woman Life Freedom" uprising in September 2022. Under the new law, repeat offenders and anyone who mocked the rules would face heavier fines and longer prison sentences of up to 15 years in jail. It would also mandate that businesses report anyone who violates the rules. *See* J. GOL, *Iran pauses controversial new dress code law*, BBC, 16 December 2024, https://www.bbc.com/news/articles/c0mv83m4z7vo. Furthermore, according to a United Nations report, Iran is using drones and intrusive digital technology - aerial drones, facial recognition systems, and a citizen-reporting app – to crush dissent, especially among women who refuse to obey the Islamic Republic's dress code. Please refer to M. TAWFEEQ, *Iran is using drones and apps to catch women who aren't wearing hijabs, says UN report*, CNN, 14 March 2025, https://edition.cnn.com/2025/03/14/middleeast/iran-nazer-app-un-report-intl-latam/index.html.

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demonstrated by the existence of an underground fashion scene in urban areas such as Tehran[63].

In Iran, no one is officially allowed to create fashion that run counter to the Government's dress code. The Iranian Government's strategy of hiring state-controlled fashion designers and supervise fashion festivals has resulted in restrictions on designers' inventiveness. This has in turn produced nothing more than a variation on the basic *chador* apparel, with negative consequences in terms of capturing public interest and the growth of economy. However, in tracking the evolution of the Islamic fashion, it was precisely in Iran that the wind of change began to blow in the 1970s-1980s. The 1979 Iranian revolution marked a significant transformation in the country's political, social and cultural landscape. The religious leader Ayatollah Khomeini stirred a new spirit of conservatism which lasted even after his death, but this movement pivoted towards more fashionable trends in the 1990s, "reflecting increased interest in consumerism as well as an interest in making one's Islamic piety visible"[64]. Although many Muslim women keep wearing *burqa* as a personal choice, others refrain from extreme Islamic clothes on purpose. Iranian women's will to experiment with fashion has often create tensions with authorities, who have used several tools to convey the message that fashion, especially western fashion, is a weakness. An example of this tense atmosphere are posters connected with the *hijab* campaign. Many of the posters were published and distributed by people authorized by the Iranian Government such as the cyber group promoting chastity and the veil and made it clear that "*hijab* is part of a battle or struggle against cultural invasion"[65]. While some posters urged men to choose a wife "who ranks one step below" their status, others resorted to psychology to suggest that "those who like to wear too much make up an improper clothes are suffering from low self-esteem", while still others went as far as to state that "the women who do not have a proper form of clothing and do not look appropriate will be targeted for street harassment and physical abuse"[66]. Some of the posters even depicted Western fashion resorting to images of demons.

The case of India, instead, shows a certain degree of internal plurality when it comes to fashion. In 2010, a *fatwa* issued by the Darul Uloom Deoband proclaimed that Muslim women exhibiting bodies when modelling go against *sharia*[67]. In 2018, the Islamic seminary also stated that wearing designer and slim fit *burqas* is *haram* in

[63] B. DARAGAHI, *Catwalk skirts the mullah*, *Los Angeles Times*, 11 May 2007, https://www.latimes.com/archives/la-xpm-2007-may-11-fg-fashion11-story.html.
[64] F. SHIRAZI, *Brand Islam*, p. 153.
[65] F. SHIRAZI, *Brand Islam*, p. 151.
[66] F. SHIRAZI, *Brand Islam*, pp. 148-149.
[67] THE TIMES OF INDIA, *Fatwa against modelling by Muslim women*, 7 April 2010, https://timesofindia.indiatimes.com/india/fatwa-against-modelling-by-muslim-women/articleshow/5768618.cms.

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response to a query from a person who had asked if wearing designer *burqas*, which are sometimes body-hugging and draw male gazes, was permitted in Islam[68]. But despite this, among Muslims living in the South of India "concerns with *decency* are always negotiated within desires for *fashion*. Kerala's Muslim community is more [affluent on average] and Muslims are especially interested in dressing well and participating in worlds of fashion, which may be vernacular *ishtyle* (Indian film-driven) or global (brands)"[69]. Finally, according to certain conservative Muslim communities in India – but also in Pakistan –, veiling equals to seclusion because of a practice known as *purdah-nashin*, which means 'one who is observing seclusion'[70]. Muslims women are thus restricted in order to maintain social order and prevent *fitna* (chaos).

In Mali, two types of attitudes in the field of Islamic fashion can be identified: on the one hand, Muslim women from urban areas enjoy fashion; on the other hand, women belonging to Islamist groups such as the Pakistani Jamaat e-Islam[71] are committed to uphold traditional values and, therefore, prove that fashion undermines female modesty[72].

With the world's largest Muslim population, Indonesia is a huge market for Islamic fashion. An example is that the country is home to the Islamic Fashion Institute, which "is expected to educate and prepare future talented Muslim fashion designers, fashionpreneurs, and fashion brand owners who have both the hard and soft competences such as emotional, intellectual, and moral intelligence ('*akhlaqul kariman*') as mandated in the Islamic rules and principles"[73].

The Indonesian Government is a strong supporter of the country's modest fashion industry. It makes room for education opportunities in the field and organizes international fashion events, which not only shed light on Indonesia's wealth of talents but also shows its growing influence in shaping the future of modest fashion worldwide. According to the Global Islamic Economy (SGIE) 2023 report[74], Indonesia ranks as the world's third-largest contributor to the global modest fashion ecosystem,

[68] F. SHIRAZI, *Brand Islam*, pp. 151.

[69] C. OSELLA - F. OSELLA, *Muslim Style in South India*, in *Fashion Theory*, 11, 2/3, 2007, p. 2.

[70] F. SHIRAZI, *Brand Islam*, p. 151.

[71] The Pakistani political party Jamaat-e-Islami was set up in India in 1941 by the Indian-born journalist and Islamic revivalist Sayyid Abdul A'la Maududi. This Islam's Political Class aims to restore an Islamic state that applies *sharia*; a state where Muslims must strictly abide to religion, and non-Muslims are relegated to the *dhimmi* (protected people) status. *See* I. BOWEN., *Medina in Birmingham Najaf in Brent: Inside British Islam*, London, Hurst & Company, 2014, pp. 83-84.

[72] D. E. SCHUIZ, *Competing Sartorial Assertions of Femininity and Muslim Identity in Mali*, in *Fashion Theory*, 11, 2/3, 2007, pp. 253-280.

[73] https://islamicfashioninstitute.id/about-us/.

[74] The State of the Global Islamic Economy Report 2023/2024 is available for download at: https://salaamgateway.com/reports/state-of-the-global-islamic-economy-2023-report.

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following Turkey and Malaysia. The Islamic fashion industry, which has experienced a surge since the early 2000s, has churned out well-known Islamic fashion designers – Dian Pelangi, Itang Yunasz, and Jenahara Nasution –, who are invited to participate in Islamic fashion shows around the world. Furthermore, the advent of social media has contributed to promote Indonesian modest fashion, with platforms like Instagram and YouTube being catalysts for inspiration for designers, influencers and consumers.

Turkey, too, has quickly become a modest fashion global center. The creator and the organizer of the Modest Fashion Weeks, the Think Fashion Group, was set up in Istanbul in 2015[75], and the first Modest Fashion week that debuted in Istanbul in 2016 then expanded with editions in cities like London, Dubai, Jakarta, Amsterdam and Riyadh[76]. Turkey is reported to produce "chic Islamic women's clothing consisting of fashionable long outer grown with matching set of pants, all accessorized by stylish large scarves"[77], but the role of Islamic fashion is controversial in Turkey, especially when it comes to the headscarf, which remains a divisive piece of clothing. Kemal Ataturk – who served as the first president of the Republic of Turkey – made unveiling a part of his secular reforms, central to which was the belief that Turkish society had to modernize by implementing changes affecting politics, law, economy, education and society. However, the majority of population is Muslim and many Muslim women wear veil.

The 1980s produced changes in the Turkish fashion world as a reaction to the forced unveiling. Homemade, shapeless outer gowns with large scarves became the marker of young urban women, replacing European-style fashion. However "as the number of protestors grew, both men and women, fashion designers and the apparel industry recognized an untapped potential: the marketing and commodification of Islamic dress"[78]. Furthermore, an increasing number of Turkish women began to choose Islamic clothes to support Muslim women seeking freedom of expression in European countries. So therefore, it was the anti-Islamic veil sentiment across Europe which contributed to the resurgence of Islamic fashion between Turkish women. Since 2006 the country has played a major role in presenting veil fashions in haute couture fashion shows[79], which has triggered debates among both secular populations, who do not regard favorably Islamic fashion, and conservative Muslims, especially those who want to demonstrate that being devout believer cannot go hand in hand with enjoying fashion.

[75] https://www.modestfashionweeks.co/about/organizer
[76] https://www.modestfashionweeks.co/about/modest-fashion-week
[77] F. SHIRAZI, *Brand Islam*, pp. 168.
[78] F. SHIRAZI, *Brand Islam*, pp. 170.
[79] F. SHIRAZI, *Brand Islam*, pp. 169.

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Muslim-majority countries' fashion world appears to be full of divergent voices and opinions. There are religious authorities saying that "it is OK for hijab to look pretty […]. And is it OK to hold Islamic fashion shows that display beautiful hijab clothing on models to promote those"[80], others who talk about '"the evil and prohibition"[81] of fashion shows, and scholars who make some distinctions and point out that "as far as Islamic Shari´ah is concerned, there is nothing wrong for hijab to be colorful and artistic as long as it is not attractive"[82], whilst "as for Islamic fashions and using models, they go against the objective of hijab"[83].

One of the most controversial fashion-related *fatwa* came from a Saudi cleric, Sheikh Abdullah Daoud, who is reported to have called for all female babies to be fully covered by wearing the face veil as it would prevent them from being sexually assaulted[84]. In response, Sheikh Mohammad al-Jzlana, who had been judge at the Saudi Board of Grievances, said that Dauod's *fatwa* was denigrating to Islam and *sharia* and made Islam look bad, urging people to ignore unregulated *fatawa* and adding that he felt it was an injustice when he saw families walking around with a veiled baby.

In spite of how it may seem, requests for *fatawa* in matter of clothing goes beyond the veil or fashion shows. Some are about men wearing a hairband on his wrist or women buying bags that bear foreign names; others concern men wearing high heel shoes or women wearing bikini at home or pants at work; still others deal with women asking about buying expensive dress or wearing pleated skirts, brand-name underwear or garments below the hands[85].

In the light of the above, modest fashion industry in Islamic countries is a growing business which has different characteristics in each country. From the popularity of *abaya*[86] in the United Arab Emirates to Iran's *chador* up to the Malayan *tudung* and the Indonesian *kerudung*, *halal* fashion moves between young designers who try to continually reinvent Islamic style and religious scholars who denounce Islamic fashion as *haram*.

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[80] F. SHIRAZI, *Brand Islam*, pp. 156.

[81] F. SHIRAZI, *Brand Islam*, pp. 157.

[82] ISLAM ONLINE, *Islamic Fashion Shows Displaying Hijab*, https://fiqh.islamonline.net/en/islamic-fashion-shows-displaying-hijab/.

[83] ISLAM ONLINE, *Islamic Fashion Shows Displaying Hijab*, https://fiqh.islamonline.net/en/islamic-fashion-shows-displaying-hijab/.

[84] M. ALYOUSEI, *Burkas for Babies: Saudi Cleric's New Fatwa Causes Controversy*, *Al Arabiya*, 3 February 2013, http://english.alarabiya.net/articles/2013/02/03/264031.html.

[85] *See* Islamweb.net: https://www.islamweb.net/en/fatawa/242/clothes.

[86] An *abaya* is a long, loose-fitting, robe-like garment that covers the entire body, except for the face, hands and feet.

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4.2. The Western side of Islamic fashion.

There is no dress code in Western countries, at least at this historic moment. Yet, it was not always so. In the Middle-Ages, women had to appear in public having their head covered: sometimes it was legislators and preachers' strategy to make them obey, other times it was a way for women to represent their personal and social condition, reveal privileges and wealth, show self-care and communicate subjection, mourning, marginality[87]. It was Christian doctrine that attributed a strong religious meaning to female veil – women had to pray by wearing a veil – and made it a symbol of decency – the veil became a sort of shield against men's sight and concupiscence – and subjection, so that it ended up marking the subordinate presence of woman in public space[88].

Currently, we can discuss the extent to which social norms requiring a certain type of clothing still apply, but there's no denying that values underpinning Western modern democracies demand not only that states possibly refrain from regulating identity fields but also that they act in order to protect them. Muslim women who wear veil in the western legal space do it as a personal choice accordingly."One thing that is striking is the extent to which many young Muslims employ a strongly reflexive language in talking about their decision to cover"[89]. They take distance from more habitual taken-for-granted ways of wearing covering clothes, which they see more as cultural attitude than a religious one. They often emphasize how their conscious decisions to cover are "part and parcel of the process of becoming a more committed and practicing Muslim"[90]. "Whereas it may be tempting to consider such an emphasis on reflexivity, choice and conviction to be the result of growing up in Europe or America where traditions of liberal governance foreground the value of individual autonomy and authenticity, it is also important to situate these attitudes within the emergence of a global Islamic revival movement"[91]. As already observed, this trend, called "the new veiling" movement, started in the 1970s- 1980s in Muslim-majority countries and initially was marked by a uniform, sober and more conservative style. It was replaced by more fashionable Islamic clothes in the 1990s, showing a shift within the Islamic revival movement itself from a radical and anti-consumerist stance towards a more individualized reformist position, where

[87] M. G. MUZZARELLI, *Ma cosa avevano in testa? Copricapi femminili proibiti e consentiti fra Medioevo ed Eta` moderna*, in C. PANCINO - R. G. MAZZOLINI (a cura di), *Un bazar di storie. A Giuseppe Olmi per il sessantesimo genetliaco*, Trento, 2006, pp. 13-28.

[88] F. TREGGIARI, *I giuristi leggono San Paolo: Il 'De Velandis Mulieribus' di Jacques Godefroy (1587-1652)*, in M. G. MUZZARELLI - M.G. NICO OTTAVIANI - G. ZARRI (a cura di), *Il velo in area mediterranea tra storia e simbolo: Tardo Medioevo-Prima Età Moderna*, il Mulino, Bologna, 2014, p. 89.

[89] A. MOORS - E. TARLO, *Introduction*, in A. MOORS - E. TARLO (eds), *Islamic Fashion and Anti-Fashion: New Perspectives from Europe and North America*, Bloomsbury Academic, New York, 2013, p. 8.

[90] A. MOORS - E. TARLO, *Introduction*, p. 8.

[91] A. MOORS - E. TARLO, *Introduction*, p. 8.

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identities are increasingly produced through consumption[92]. As a result, not only a new market for Islamic fashion emerged, but also a new understanding of Islamic fashion come to life, spreading all over the world and often modeling itself through cultural encounters.

The evolution of Islamic fashion that has taken place in Muslim majority countries over the decades seems not to have an exact equivalent among Muslim communities in Western countries, where different Islamic fashion styles have been displayed since the progressive Muslim settlement in this area of the world. Currently, it is possible identify two big categories of Islamic fashion in the West: a category bringing together several forms of a minimal and rigorous style that seem to give shape to a literalist reading of Islamic clothing rules, and a category encompassing a multitude of hybrid and (more or less) contaminated styles where a wide range of interpretation of Islamic rules can be identified.

Although there is a growing Western modest fashion industry, originally this sector of the Western economy was way far from the larger Islamic fashion sector in Muslim-majority countries such as Indonesia, Turkey, UAE or Malaysia. Islamic shops were small and they used to sell conservative clothing products. It is only with the new millennium, especially after the first decade, that western countries have started to specifically cater to a public that ask for more fashionable Islamic clothes. Some Islamic fashion manufacturers have opened subsidiaries in Europe accordingly, and Islamic fashion chains have been directly set up in European countries.

Muslim and non-Muslim designers in Western countries are increasingly experimenting with Islamic fashion: "their goal is to marry modest, reserved fashion with design concepts that are beautiful and chic, no easy feat"[93]. Some stories have become known. That is the case with: British designer Sophia Kara, who started designing her own collection to find something that she could be more confident with; American Nzinga Knight, who described the look of her work 'sensual, mysterious and innovative, and her creations designed for a woman who is happy to be a woman; Brooklyn-based designer Nailah Lymus' clothing line, Amirah Creations, which shows bright colors and patterns that target Muslim and non-Muslim women in order to break down Islamic clothing-related stereotypes[94]. At the

[92] A. MOORS - E. TARLO, *Introduction*, pp. 8-9.

[93] F. SHIRAZI, *Brand Islam*, p. 171.

[94] As a secular country since 1905, France forbids all public employees from wearing outward signs of religiosity. In particular, there is an ongoing social, political, and legal debate concerning the wearing of the Islamic veil and , more recently, other forms of Islamic coverings in public. All started in 1989 when three children were barred from attending middle school after refusing to take off their *hijab*. It was the first of countless 'veil affairs' that have led French governments to pass two laws: one in 2004 (Law No. 2004-228 of 15

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same time, the West has been reached by famous Muslim fashion designers such as the Saudi Al-Jassim, whose creations are variations on the traditional *abaya*.

When it comes to that specific Islamic piece of clothing which is the veil, in Western countries it is often linked to the stereotype of the veiled Muslim woman as a victim of a patriarchal system. Although this representation of Muslim women may be true sometimes, the act of veiling is considered as a feminist statement at other times. After the colonization of the Middle-West in the nineteenth century, for example, "the pro-feminist veiling camp argued that hiding one's body from the lustful gaze of men allows women to be dealt with as individuals, to be independent, with their own values and intelligence, rather being judged solely on physical appearance"[95].

When the Islamic veil entered the western courtrooms in the form of religious symbols, it did not fail to spark debates. An example is the case of France[96]. Since the 1980s, the Islamic veil has become the focus of the public debate on *laïcité* , which has progressively shifted from the role of *foulard* (*hijab*) in public schools to the ban on the full-face veil (*voile intégral*) in public space, producing *ad hoc* legislative measures[97]. However, in August 2023, the spotlight turned on the *abaya*. Right before the resumption of school activities, the Minister of education Gabriel Attal publicly announced his decision to ban this garment in schools, giving rise to a number of reservations on both political and mediatic front[98].

Over time, 'clashes' between the need to abide by Islamic clothing rules and the need to comply with the obligations arising from state affiliation have been brought before the European Court of Human Rights[99], which has been called upon to balance the

March 2004) which forbids the veil – as well as the skullcap and large crosses – in schools, and one in 2010 (Law No. 2010-1192 of 11 October 11 2010) banning full-face coverings such as the *niqab* in all public spaces.

[95] F. SHIRAZI, *Brand Islam*, p. 152.

[96] J. A. SELBY, *France*, in J. CESARI (ed.), *The Oxford Handbook of European Islam*, Oxford University Press, Oxford, 2015, pp. 30-33.

[97] L. CÉDELLE, Laïcité à l'école : du « foulard » de 1989 aux abayas d'aujourd'hui, trente-cinq ans de controverses, Le Monde, 8 March 2024, https://www.lemonde.fr/idees/article/2024/03/08/laicite-a-l-ecole-du-foulard-de-1989-aux-abayas-d-aujourd-hui-trente-cinq-ans-de-controverses_6220941_3232.html.

[98] In this respect, it might be of interest to report what *The Guardian* writes about an increasing representation of the Islamic clothing: "it is no longer so much a question of banning a long, loose garment to free young women from the grip of the Muslim patriarchy as about protecting other students from the proselytizing threat that these abaya-wearing adolescents could present. These girls are now seen as school-going envoys of global Islamism". See K. HARCHI, *Muslims are already excluded from French political life: that's the real issue in the school abaya row*, *The Guardian*, 5 September 2023, https://www.theguardian.com/world/commentisfree/2023/sep/05/muslims-excluded-french-political-school-abaya-france.

[99] Court cases such as *Dahlab v Switzerland* [2001] or *Leyla Şahin v Turkey* [2005] should be mentioned, even though the best-known case is probably *S.A.S v France*, [GC], no. 43835/11, judgment of 1 July 2014, which was brought by a French citizen and devout Muslim who sued the French Government for passing the law banning face covering. She asserted that the ban was discriminatory under Article 14 of the ECHR, and that it infringed upon the right to respect for private life (Article 8). She also argued that the ban violated the freedom to manifest

right to cultural identity when expressed through the decision to wear the veil with a set of other rights on the assumption that, from a legal point of view, expressing identity through the right to choose what to dress is a corollary of the right to non-discrimination[100].

Choices concerning fashion have proven to have a geopolitical significance, too. In 2014, the Instagram account of the Brooklyn-based Jewish creators Mushky Notik and Mimi Hecht, founders of Mimu Maxi, was attacked because they reposted the picture of a Muslim blogger wearing one of their creations[101]. Furthermore, according to a widespread representation, middle-eastern clothes are synonymous with *jihad*, as demonstrated by political, media e social debates in Western countries[102].

The legal sphere of Western countries has been widely affected by its encounter with Islamic fashion, and more specifically with the veil and its multiple forms. But, on a closer examination, the veil itself seems to have acquired new meanings after its encounter with the West. One could even retrace the evolution of Islamic veil in western countries by identifying three phases that have enriched its symbology, bearing in mind that the different meanings that it has acquired in each historical phase do coexist with each other. In the mid-1970s, the veil was one of the instruments used in the process of emergence, visibility and affirmation of Islam in Western countries. In the early 2000s, it became the major banner of the ideological battle against the West, which, for its part, was increasingly faced with episodes of Islamic terrorism, but, after the first decade of the new millennium, it has turned out to be the accessory *par excellence* of Islamic fashion, which is establishing itself as an eclectic growing global market which makes modesty its *distinctiveness*.

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one's religion or beliefs, protected ECHR Article 9, and the right to freedom of expression under ECHR Article 10. The Grand Chamber's analysis focused principally on the compatibility of the French law with Article 8 and Article 9 of the Convention. The Court accepted France's argument that the law was enacted to promote public safety, but expressed skepticism as to whether the ban on full-face veil was a necessary and proportionate measure in the absence of a general threat to public safety. The Court was more receptive to the argument that the ban was also to protect the "rights and freedom of others," especially the "respect for the minimum requirements for life in society". The Court found that Franch law did not violate the Convention and, in doing so, accepted that the ban was necessary in order to achieve 'living together' ('*vivre ensemble*').

[100] R. PALAVERA, *Abbigliamento, Diritto e Marginalia*, p. 300

[101] J. BRACCULIERI, *Orthodox Clothing Boutique Posts Photo Of Muslim Blogger, People Freak Out*, *Huffpost*, 18 July 2014, https://www.huffpost.com/archive/ca/entry/orthodox-clothing-boutique-posts-photo-of-muslim-blogger-people_n_5599452.

[102] J. CESARI (ed.), *The Oxford Handbook of European Islam*, Oxford University Press, Oxford, 2015.

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