Managing Transnational Islam in Western Europe:
The Limits of Institutional and Postnational Approaches

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I. Introduction

The impact of the international arena on populations of immigrant origin became a regular feature of national political discussions in Europe during the 1990s. The variegated success in socio-economic integration of second and third-generation immigrants from the Muslim world created potentially restive populations in the urban peripheries of major European capitals. Debates in the late 1980s and early 1990s over the Rushdie fatwa, the Palestinian Intifada, the Gulf War, and the headscarf affair all heightened governments’ fears that these subpopulations were especially vulnerable to extraterritorial influences. Enhanced community demands for recognition of Islam in the public sphere and manifestations of cross-border solidarity with Muslims in conflict zones around the world coincided with these governments’ growing concern over Saudi-sponsored religious fundamentalism abroad after the end of the Cold War (Kepel 1991). The implantation of Islam in Europe, led by Saudi Arabia’s Muslim World League, and the maturation of migrant Muslim minority communities of North African and Turkish origin with strong ties to home governments and international NGOs, have posed a sharp threat to European states’ sovereignty from transnational religious bodies and to the separation of church and state. The decline of state sovereignty—in matters ranging from immigration policy (Hollifield 1998) to foreign policy—has been magnified by the particular challenges posed by international Muslim networks that straddle national borders and cultures (Lubeck, 76). The activities of these networks revive the specter of transnational religious influence over European populations, familiar from 19th century experiences with Judaism and Catholicism: e.g. the applicability of fatwas, the necessity
of wearing the headscarf, the civil recognition of marriage and divorce, the obligation to wage holy war, the source of financing of prayer space, and the training of imams.

The years since September 11th, 2001 could be seen as the culminating period of general attempts to “de-transnationalize” cross-border solidarity of Muslims in Europe. If, as Soysal (1994) writes, transnational migrant communities gained indirect access to European polities in the 1980s thanks to new international human rights norms and conceptions of postnational membership, then we have since 1989 witnessed the state defend itself and redefine the contours of its sovereignty. The state has struck back at the organizational networks established by foreign governments and international NGOs by using the tools at its disposal to shelter Muslim minorities from transnational political and religious pressures. This has taken the form of Islam’s institutionalization in national church-state regimes and the use of parliamentary legislation to place a domestic imprint on the religious norms of believers. Institutional consultations have led to the establishment of a French Council on Muslim Religion (CFCM) and of several councils in German Länder to guide state-Islam relations, and the Italian government has similarly initiated formal efforts “to distinguish moderates from extremists” in their search for a state-church interlocutor among their Muslim communities. As early as 1989 (France) and as recently as 2003 (Italy), these governments began locating and incorporating the associations and leaders who would explicitly accept the national constitutional framework and the paramountcy of the central state in exchange for the political reward of a representative monopoly over religious community issues.

New laws directed at Muslim populations provide additional windows onto government efforts to relieve transnational pressures exerted on their citizens. The 2000 citizenship law reform in Germany, for example, affirmed the state’s sovereignty over the Turkish population – effectively re-territorializing the state’s jurisdiction (de Galembert 2001). Laws banning the wearing of Islamic headscarves in certain state-run institutions passed in 2003 and 2004 in France and Germany clearly aimed to undermine transnational Muslim religious norms. Governments’ legislative efforts plotted a delicate course around constitutional and international treaty obligations. By passing legislation rather than issuing a decree or administrative ruling restricting religious expression, for
example, the French government’s laïcité revival circumvented the European Convention on Human Rights technical prohibitions.


Governments have pursued state-centric agendas, but they have also had to manage the supply-side of competing demands and interests of Muslim organizations at home and abroad. This dissertation examines the evolving balance between supply and demand pressures guiding state intervention in Islamic affairs in two broad periods over the past thirty years. During the first period (1974-1989) governments tolerated international Muslim organizations’ evangelizing activities and accommodated some basic religious needs. In the second period (1989-2004) policies targeted the transnational traits of Muslim populations with instruments of domestication and incorporation. Policies of the first period were driven by the assumption of a transient and minor Muslim presence. Pragmatism and geopolitics led to passive acceptance of minor challenges that Islam posed to the dominant socio-cultural, largely Christian, order. The laissez faire policies of that era encouraged international organizations to fill a vacuum left by the hesitant hand of the lay state, creating an untenable scenario to be addressed in second period. Ultimately, the predominant diplomatic arrangements promoting an “Islam of the embassies” proved unworkable. Alongside the timid development of some traditional social integration policies, European governments used religion policy to de-transnationalize global religion of Islam. This institutionalization aimed to minimize the impact of foreign religious authorities and networks on domestic populations by reaffirming the centrality of the state and casting religious practice in a national framework. These policy processes are rooted in national state-church regimes and state-society norms, but should be viewed through the prism of the first phase, as each state tries to reduce reliance on the very international networks it had supported in the first period.

The limited regulation of Islam between 1974 and 1989 aimed principally to resolve material needs for Muslim populations of immigrant origin: e.g. the availability of burial sites, prayer spaces, ritual animal slaughter, religious education, chaplains in hospitals, prisons and the army, etc. These pragmatic arrangements derived from
ambiguities and ambivalence about the size and permanence of migrant populations, grounded in pervasive optimism regarding the reproduction and cohesive force of national identity. In addition, the increasingly coordinated economic and diplomatic bloc of six European Community member states negotiated its own growing influence among governments of the oil-producing Arab world between the regional power brokers of the US and USSR, while navigating Europe’s colonial past.

The extension of religious freedom to Muslim missionaries and nascent minority religious communities in this first period took place in an international organizational field of the early-mid 1970s that was strikingly similar to the choices that East Asian countries faced with Christian missionaries and minorities following military defeats and commercial dependence on Europeans in the mid-19th century (Baker 1997; Rudolph 1997). The Chinese political community, Baker writes, “was forced to accept rents in its fabric as the transnational Christian religious community, with support from Western governments, began to carve out zones of autonomy for its Chinese members” (Baker, 150). In the first, international phase, European states developed a policy of toleration and mild accommodation towards Islam, engaging in the light-handed regulation of foreign missionaries and minorities, in essence, just as China, Japan and Korea had done with Christians. In the case of 19th Asia and 20th century Europe, exposure to another region of the world with distinct religious traditions – either through international migration or trade – led to demands by new residents for recognition and for new freedoms of religious exercise.

These demands first peaked in the late 1980s and pointed to the emergence of a new transnational class of guestworker populations (Kastoryano 2003; Soysal 1994). The State-Islam consultations that began in earnest in the late 1980s and early 1990s during the second period recognized that populations of immigrant origin were there to stay. Governments also acknowledged the reality of bottom up pressures for recognition and the danger these populations could be “lost” to competing influences if existing policies were to continue. An over-reliance on foreign representatives had stifled a burgeoning “Islam of the Street” as well as an increasingly assertive “Islam of the federations” (Alliévi 2000; Maréchal 2001). National federations and local associations challenged the legitimacy of foreign monopolies over the regulation of Islam. Governments accordingly
increased the stature and institutional position of religious associations and Muslim federations active within national context. Muslim groups took advantage of association law granted to foreigners in mid-1960s in Germany, and in 1981 in France. The resultant representative configurations of the second period are critical in determining the degree of symbolic integration – and channels of political participation – for organized religious groups in these societies. French, German and Italian governments have distinct institutional arrangements and philosophies of state-society relations and the role of religion in public life – sometimes even conflicting views between political coalitions. They also draw on different approaches to citizenship and immigrant integration, and divergent histories and structures of state-church relations. State policies have aimed to influence the shape and impact of religious belonging on the duties of Muslim citizens living in the West, re-discovering religion policy, paradoxically for some, as a tool of immigrant integration.

III. Explaining Toleration And Accommodation Regimes (1974-1989)

From the perspective of institutional inertia and path dependency, it is worth looking at the European governments’ initial interaction with Islam, since this led to later difficulty during state-Islam consultations. Individually and collectively, there was a common trend of privileging embassies for a blend of purposes. Four central reasons converged to favor inter-state solutions to the (1) secularist pragmatism (2) national security concerns (3) ambivalence over the permanence of Muslim minorities (4) trade relations and ambitions in the Middle East. The first institutionalization of Islam reflected diplomatic and commercial ties with regard to dominant sending state (such as Algeria for France, or Turkey for Germany) or deference to the rising center of Muslim authority in international politics (e.g. Saudi Arabia). The special relationship of post-colonial ties, additionally, which were tinged with feelings of European guilt, may have also contributed to the granting of wider influence to sending states over emigrant population.

III (a) The Pragmatism of Secular Regimes

During the early 1970s, the populations of immigrant origin in Western Europe were still in the first generation – largely male and just beginning to decide whether to
settle or return to their countries of origin. Though some labor migrants had married and had children, this period preceded the arrival of families in mid-1970s and the subsequent development of Muslim communities with pronounced Muslim identity. These male workers practiced what could be called a “Gastarbeiter Islam” (Feindt and Steinbach) or “Islam des foyers” in their dormitories (Kepel 1991). During most of the post-war era, all European governments with labor migrants from the Muslim world encouraged the involvement of “home countries” in the provision of religious requirements for practical reasons – in particular Algeria, Morocco, Turkey, Senegal and Saudi Arabia. In terms of population management, it made sense for European states to rely on Arab governments and migrants’ home countries, since they were experienced in dealing with material and practical requirements of religious observance (burial, ritual animal slaughter).

<table>
<thead>
<tr>
<th>Early Instances of Muslim Accommodation in France</th>
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<tbody>
<tr>
<td>1973-4 Sonacotra - prayer spaces in public housing</td>
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<tr>
<td>Mar-75 Interior Ministry's (Poniatowsky) &quot;10 Points&quot;</td>
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<tr>
<td>Nov-75 Special sections in cemeteries</td>
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<td>1975-8 Sonacotra - prayer spaces in public housing</td>
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<td>1976 Renault - prayer spaces in state-owned factories</td>
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<tr>
<td>Paul Dijoud, State Secretary for Migrant Workers - measures to ease practice of Islam, eg working</td>
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<td>1976 hours and prayer time</td>
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<td>1978 Camac/Camavic - Social security for clergy extended to Imams</td>
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<td>1980 Raymond Barre – decree “Conseil consultatif des musulmans français”</td>
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<td>Secretariat aux rapatries de Raymond Courrier met l’accent sur l’action sociale: centers d’éducation, formation professionnelle, contrats d’action sociale educative, culturelle:</td>
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<tr>
<td>1981 “immigrés de l’intérieur” – granted same indemnisation as others from decree of 5 aug 1970</td>
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### III (b) Domestic Security Calculus

European governments also appreciated Muslim states’ adeptness at fighting Islamist radicals, since dissidents operating in the relative freedom of Western countries can represent a threat to their regimes from afar. Home and host countries’ shared a desire to reduce potential of radical threats to their own regime’s stability. Some dissidents or extreme fringes of state Islam in Turkey, Algeria, Morocco, Saudi Arabia etc. had sought refuge in Europe and were enjoying democratic freedoms denied in their home countries: “first and second-generation immigrant communities offer better bases for the exchange of ideas and information than those available in countries of origin” (Eickelman, 31). “Algeria, Morocco, Turkey and Senegal were able to offer France a
common front that was perhaps not pro-Western but at least anti-terrorist” (Interview, Alain Boyer, June 2002). Thus the Libyan and the Algerian governments were viewed, in the words of a French minister for cooperation, “a model for young nationalists seeking to loosen the vice of neo-colonialism without becoming atheist Marxist Leninists or like the Soviet satellites in Africa” (Frémeaux 1995). Likewise, western countries sought to contain the regional aspirations of newly theocratic Iran (Shi’a) by supporting its Sunni rival Saudi Arabia.

Given the alternatives at the time – the growing influence of Nasserite Egypt, the Ba’th party, radical regimes in Algeria, Libya, Syria – European states preferred to tolerate the implantations of Saudi-sponsored (Sunni) Wahhabi Islam, which was viewed as a one of the more moderate variants of centralized Muslim initiatives (Rudolph, 254). The Turkish DITIB in Germany, the Saudi Muslim World League in Italy and France, and Algerian Grande Mosquée de Paris in France (GMP), were all granted a privileged, institutional presence in State-Islam relations in order to counter the implantation of organizations linked to the Egyptian and Syrian branches of Muslim Brotherhood, Germany-based Milli Görüs, Algerian FIS (Islamic Salvation Front), and Saudi Salafists, e.g. Over time, the GMP in France became a “second embassy” yet “a useful bulwark against Islamic radicalism” (Boyer 1998). By 1979, twenty-six Turkish DIB bureaucrats already in place throughout Europe – compared to 150 Sufi Suleymanci preachers, 100 National Movement Party preachers, and 150 Milli Görüs-affiliated preachers (Blaschke 1989, 332).

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1 Jean-Pierre Cot, 1984; Books published at the time: Saddam Hussein, un gaullisme arabe? ; Hafez el-Assad, parcours d’un combatant;
2 House of Saud and Wahhabi Islam linked since Prince Ibn Saud “championed religious revival preached by Muhammed Ibn Abd-ul-Wahab (Hunter 1998, 153); “L’attentisme s’est mêlé parfois de pragmatisme, leading public authorities to privilege relations with countries of origin rather than with the different emerging communities in their territory when creating a framework for Islam” (De Galembert 2001, 226).
III (c) Ambiguity over the Permanence of Migrant Minorities

There was political ambiguity over the permanence of migrant presence throughout the duration of guestworker programs, continuing even after labor migration was formally ended in 1974.\(^3\) Home countries have always sought to retain political and religious influence over their expatriate nationals. This is partly pragmatic: foreign cash remittances in Morocco, for example, make up the largest portion of GDP after tourism revenues and phosphate industries; ideologically, in addition, each national brand of Islam is in competition with its neighbors as much as with any imaginary West. During the 1960s, Algerian and Moroccan governments supported “amicales,” religious clubs for single male guest workers (Amicale des Algériens en Europe (AAE) since 1962 (Hargreaves, 1990, 301)). There were continued appeals to Algerians and Moroccans to vote in elections at “home” well into the 1990s; the Moroccan government even created a special ministry for the “emigrant community.”\(^4\) A convention signed by France and Morocco in 1981 obligated judges to apply Moroccan Islam law in matters of marriage, divorce and inheritance, for Moroccans living in France (without French citizenship).

In Germany, there existed consensus that Turkish migrants would eventually return ‘home’ to Turkey. The particularity of nationality law meant that Gastarbeiter and their offspring were not destined for citizenship, and thus Islam, as the religion of foreigners was considered “an exogenous reality” (de Galembert 2001). Turkish government did not push for citizenship rights (except as part of double citizenship), retained conscription for Turkish nationals as well as citizenship requirement for inheritance through mid-1990s. Official refrain that Germany is not a country of integration (“Deutschland ist kein Einwanderungland.”). Foreign Minister Genscher’s 1982 visit to Ankara made clear Germany’s desire for political and economic stability in Turkey (two years after a putsch), especially “since the country’s intake capacity had

\(^3\) The economic slump following the same OPEC embargo led European governments to end labor recruitment and related migration. Which had the unintended consequence of encouraging long-term settlement (Chapin 1997). Set the stage for the family reunification court battles that would take place in French and German high courts in 1976-8; family reunification reinforced the trends of investment and development of families.

\(^4\) –1984 elections for ‘their’ reps in Moroccan parliament : 5 deputies btwn 1984-1992 for circonscriptions representing the 2m Moroccans abroad (2 districts in France) – reverse colonial –
been reached” although 700,000 family members of Guestworkers in Germany were then awaiting departure (Refflinghaus 264). 

The issue of foreign interlocutors first emerged because of the way in which religious education is organized in public schools of many German Länder. When Bavaria granted the right to teach Islamic religious education in the early 1980s, for example, a monopoly over instruction was given to the Turkish state bureaucrats of local DITIB branch. The official encouragement of a “home country” identity also dovetailed with a mutual fiction of eventual “return” – non-renewal of residence visas, emigration incentives and even plans for mass deportation pursued well into the 1970s in both Germany and France (Koopmans 1999; Weil 1995; Refflinghaus 2003; Ireland 1994, 52). The DITIB, for example, has traditionally opposed religious instruction in German and insisted on using Turkish. And, notwithstanding French tradition of integrating migration flows throughout the 20th century, long-term settlement was not promoted as public policy for North African migrants. Thus at various points, the proxy of the Algerian government was granted monopoly over organization of Islam. The few French policies aimed at immigrant workers and their families promoted native cultures and ties with homeland: thus FAS (social affairs ministry, founded in 1959) sponsored Arabic language radio, ELCO (through foreign affairs ministry) funded imams who could give Qur’anic instruction. De Galembert calls this a form of “extra-territorialization of Islam” (2001).

III (d) Geopolitical Considerations

Early attempts to organize Islam, finally, were heavily influenced by the geopolitical conditions under which Islam first took root in contemporary Europe. Baker’s research on East Asian confrontation of 19th century Christian transnationalism shows how regional dependence, in effect, dictates the broad outlines of state religion policy. Along lines of that which Christian powers required of East Asian nations in return for favorable diplomatic and commercial ties: religious toleration of missionaries (and ultimately, some autonomy for minority religious communities). “It was the Chinese, Japanese and Korean relationships beyond East Asia since the mid-19th century,” Baker writes, “that forced these countries to recognize Christianity and grant

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5 A theme also taken up during Prime Minister Özal’s 1984 visit to Bonn
Christians some religious freedom” (Baker, 156). There were similar diplomatic considerations given a growing reliance on the Arab world for oil and trade purposes, as well as aspirations to use European influence in the Middle East to serve as counterweight to USSR and US (Hubel 1986).

Europeans first recognized their dependence on the Arab world following the Arab-Israeli conflict in October 1973, during the OPEC embargo of the US and the Netherlands, and the threatened oil embargo of the rest of Europe. The use of the “oil weapon” revealed the “capacity of the Arab states to change the terms of their relationship with external powers through their control of large supplies of a critical resource – oil” (Fraser 221). In the assertive behavior of Egypt’s 1973 invasion and the OPEC embargo of the US and the Netherlands, “Arabs were finally once again able to change the power dynamics and be agents and full subjects of their own history” (Benchenane, 14). But Europeans, too, sensed a chance to change course. Just over a decade after French withdrawal from Algeria – the symbolic end to the European colonial era in the Arab world – EC countries saw an opening for new European-Arab cooperation and a chance to decrease American influence in the Arab world. During the embargo, France refused to participate in a US-led “coordination group” of oil-consuming countries. The attitudes of EC countries towards the US reflected “each state’s conception of what kind of Europe they wanted to construct: a European Europe, or one that is submissive to the Americans?” (Benchenane, 90). As French former foreign minister Michel Jobert stated, “The Israel-Arab war… reminded Europe of its singular

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6 The heavy dependence of South Korea on the US meant they “could not afford to alienate an American population that treasures religious freedom” (Baker, 163).
7 Organization of Petrol-Exporting Countries (OPEC) was created in 1960 – Saudi Arabia, Iraq, Iran, Kuwait and Venezuela; Org of Petrol-Exp. Arab Countries (OPEAC: Saudi Arabia, Libya, Kuwait) created in 1968 as instrument of inter-Arab economic integration, after 17 years of negotiations among arab producing countries; consists of permanent oil council in society hq of Arab League; a court (Benchenane, 79)
8 France and Italy, as “Muslim powers” in 1924, supported the end of the Hashemite caliphate in Mecca and Medina under Ottoman Empire, and saw the victory of Saudi armies as a step in the right direction towards greater stability in Islam’s holy places” – though this was complicated by Italy’s diplomatic relations with Yemen, who opposed House of Saud…. Italy had taken advantage of anti-French and anti-British sentiment in the Arab world in the 1930s: Mussolini declared himself “defender of Islam” (Donini, 47, 49); French colonization of Algeria, in particular, had poisoned its relations with Saudi Arabia (Nonneman, 31)
9 France, Spain and UK (temporarily) put on “preferred list” to spare them the effects of the embargo and 5% decrease in production (Nonneman, 32)
destiny, which is not simply that of an Atlantic promontory… The oil embargo was an alarm bell, not the cause, of the crisis” (Jobert, 10). Jobert had earlier noted that “European projects, such as the [Euro-Arab] dialogue face a determined opposition… The struggle is, how can the [Arab] states escape a system of economic and monetary control by the United States? Saudi Arabia has been American since 1938.”

In this context, Italy and even the Vatican City pursued relations with Arab-Muslim world. Additionally, the Italian government developed personal relationships with Shah of Persia, Syrian ambassador to Madrid, Qaddafi, Catholic Schools in Amman. I knew the Shah well because I met with him on numerous occasions. We have cultural and historical relationships, in addition to personal relationships. But we are also interested from the point of view of being Mediterranean and so we are involved with many Islamic countries. We need to know and understand one another. Beginning in the 1970s and continuing through the next two decades, the influential French specialist of the Arab world, Jacques Berque, constantly promoted a similar notion of "cultural synthesis" between Europe and the Arab world.¹¹

The cultural Euro-Arab Dialogue was the next step after Islamic-Christian dialogue. European certitudes were shaken by [the events of 1973-4]” (Benchenane 194). Affirm cultural and scientific contributions of Arab world, as well as highlighting aspects of tolerance and intellectual within Islam itself – an oft-cited hadith by Europeans involved with this dialogue was that: “The ink of the wise is as valuable as the blood of martyrs.”¹² The Euro-Arab dialogue was rooted in the desire to emerge from the “impasse of Euro-Arab relations over the centuries” (Benchenane 191) – a historic reframing of the economic and diplomatic dynamics between the two regions. The dialogue coincided with the growing importance of religion in the “statecraft of Arab politics” before the Iranian revolution (Fraser, 213).

In response to the rise of Arab nationalism and socialism (Nasserism and Ba’athism) from the mid-1950s through the 1970s, the Saudi government made “systematic use of Islam as an instrument of its foreign and security policy” to safeguard the position and interests of the royal family. (Hunter 1998, 156). The difficulties of secular nationalists exemplified by Nasser’s military weakness against Israel (Fraser

¹² Hamburg Mayor Donanyi (1986) and Jacques Berque (1985)
214). Saudi Arabia had become a major player in international Islam and Middle East commercial and diplomatic thanks to its role as custodian of Mecca and Medina, as well as its more strategic use of its oil resources and revenues. Saudi Arabia emerged as leading oil exporter and creditor and was gaining in its competition with Egypt following the latter’s defeat by Israel, which marked the collapse of Nasserite ideology and defeat of a privileged alliance with the Soviet Union” (Leveau 2003,146). “Saudi Arabia could serve as interlocutor within Arab state system for the concerns of its western allies” (Fraser 221).

European governments began to seek individual and collective bilateral oil and arms trade agreements with the Kingdom and other Gulf states (Al-Mani’; Benchenane, 55; Hubel, 62). “The West viewed Saudi style Islam as a convenient antidote to both Communism and Arab radicalism” (Hunter 1998, 159). Saudi Arabia, in turn, used the military buildup from West, “along with status as custodian of the holy sites to consolidate their presence in the wider Islamic world supporting the Muslim World League and the Organization of the Islamic Conference” (Fraser, 221). A more ambitious Saudi foreign policy ensued, with expanded influence in Asia, Africa, the Arab world and Saudi Arabia’s non-Arab neighbors such as Iran, Turkey and Pakistan; a determined effort to acquire the spiritual and political leadership of the Arab and Islamic worlds” (Hunter 1998, 158). Perhaps an “Islamic Commonwealth” constructed by the Saudi monarchy would be “one of tomorrow’s geopolitical realities, and one of the spiritual forces of a world in disarray” (Frémeaux, 144).

Increased diplomatic and commercial cooperation

This period saw a large increase in European Community “associative diplomacy” and foreign aid to the Arab world; the oil crisis had led to a greater openness to the concerns of Arab states and a desire for economic and cultural exchange, as Europeans sought a guarantee of oil flow. The EC signed further bilateral Association agreements between 1969 and 1974, which had been formally invited by a declaration of the League of Arab States beginning in 1968. The EC’s Council of Ministers stated the intention to associate “member states at the heart of political cooperation and the Community in order

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13 Khadim al-haramayn = servant of the holy places – a role previously held by Hashemite Kingdom (Jordan) during Ottoman Empire
to situate Euro-Arab cooperation in a general policy framework.”  

In the course of the 1970s, accords were signed with governments representing 70% of the Arab population, covering half of all European exports to the Arab world (Benchenane 267). Improved relations with Saudi Arabia – including extensive arms trades beginning in 1975 – allowed a mini-oil crisis that followed “to pass almost unnoticed.” 

Andreotti noted that following Sadat’s peace treaty with Israel in 1978, the “Western countries divided the task of visiting Arab capitals to calm the opposition front against Sadat’s decision, we Italians were in charge of Libya, Jordan and Iraq” (interview, October 2003). Arab governments main priority was Palestine, but the issue of Islam in Europe was a convenient symbolic repository for the newfound good will between Europe and the Arab world.

Increased cultural cooperation

Leveau dates the issue of “minority Islam in Europe” to the reintroduction of religion into international politics following the 1967 Arab-Israeli war, but the true turning point is the end of immigration in 1974 and the permanent settlement of North Africans and Turks in Western Europe (Leveau 2003, 149). In 1974 a Euro-Arab Dialogue was institutionalized between 21 Arab states and the 10 countries of the European Community (EAD): met several times a year to discuss trade issues alongside the theme of cultural cooperation. As a reaction to the impression that “Euro-Arab cultural relations have been conducted on a basis of inequality for centuries” (Benchenane 194). The Arab world is “a source of oil” for European countries, “not a source of cultural inspiration” complained one observer.

“The spread of Wahhabi Islam became closely interconnected with the achievement of [the House of Saud’s] secular objectives” (Hunter 1998, 159). This period yielded significant benefits in terms of implantation for Saudi Arabia and the Muslim World League. This coincided with Europeans’ strategic competition with the US for

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14 cited in Benchenane, 112
15 1978 plus Qatar and Egypt
16 S.Freund (1979) “Difficultés d’undialogue Euro-Arabe dans la culture” Die Dritte Welt, no.4, cited in Benchenane 195
regional influence in the Arab world; Italy, for example, had begun to distance itself from US foreign policy already following 1967 war (Strika, 58).  

Timeline 1974-1989:
- In Feb 1973, MAE Medici signed cultural, scientific and technical exchange agreement in Ryadh, and in June of that same year King Faysal visited Rome where the Islamic Cultural Center received approval.
- In 1974, Saudi and Arab ambassadors received legal recognition as religious entity, and Italian government (under Giulio Andreotti) secures agreement from Pope Paul VI that Vatican would not block project; soon thereafter, President approves legal personality for Rome Mosque as Ente Morale, allowing the city of Rome to grant it space on outskirts and permission build the Centro Culturale Islamico, which would become the largest mosque in Europe.
- Also in 1974, Belgium grants Islam state recognition “of administrations in charge of the needs of the Muslim religion” in provincial governments; director of the Centre Islamique et Culturel as the privileged interlocutor for Islam between 1978-1980 (Frégosi 2000).
- In 1975, King Faisal bin Abdul Aziz paid for construction of Vienna Islamic Center, which had been stalled since 1968.
- In 1977 the Muslim World League opens offices in Paris (Schulze, Dassetto).
- In 1978, post-Franco Spain “deconfessionalized” the state and revised its concordat to recognize minority religions, including Islam (Frégosi 2000).
- In 1979, Austria –Shura Council, Conseil Supérieur, Mufti
- In 1980, a Libyan-financed grand mosque opened in Catania.

Arab and Muslim media, portrayed this implantation as important historical events – when the Rome mosque was completed, for example, stories trumpeted “the establishment of a mosque in the very center of Christianity” (Allievi, 87). The Muslim World League Journal reported “A Mu’ezzin on a minaret calling Muslims to prayer in the historic center of Christianity?”; and, that “the Eternal City, the cradle of Christianity, is getting ready for the dedication of a mosque… probably the most important monument to see the light of day in postwar Italy”.

Saudi money was elicited to support mosque construction in Europe; and during this time, French and German governments continued parallel relations with Algerian, Moroccan and Turkish governments, respectively, regarding “their” nationals. “The Arab immigrant community, additionally, could be a factor for development of the cultural

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17 (PM Moro and MAE Fanfani)
18 “Islamic Centre in Vienna: Beginning of a New Era for Islam in Europe,” Muslim World League Journal, Jan.2000, Vol.27, No.10; The Austrian Chancellor, the minister of Foreign Affairs and a representative of the Saudi King attended the opening ceremonies.
19 this would inspire Italian reform of Lateran accords and accords with culti ammessi (see Gianni Long, interview, and le Confessioni Religiose in Italia)
dialogue” (Benchenane 197). A Euro-Arab dialogue report recommended “that the Arab countries strengthen their cultural support to Arab migrants in Europe.” The “social integration of migrant workers and their families in the host countries [would] be facilitated by… making the general public more aware of the cultural background of migrants, e.g. by promoting cultural activities of the immigrant communities,” as well as “assuring that migrants be in a position to receive regular information in their own language about their own culture as well as about the conditions of life in the host country.”²¹

But beyond the management of immigrant populations, European governments’ diplomatic and commercial motivations remained paramount in their interaction with Islam. In the early 1970s, Muslim immigration to Italy, for example, was just beginning; thus, the principal reasons for building the mosque were political, strategic and symbolic… “ (Allievi 2001, 87). After armed dissidents occupied the great mosque of Mecca in November 1979, the French President Giscard sent special forces to help Saudi monarchy retake control (Hubel; Eickelman 235). This was like Louis Napoleon’s coming to Pope Pius IX’s aid at time of first Republican revolution under Mazzini (The U.S. played this role during the first Gulf War, and stayed in Saudi Arabia until 2001).²²

By affirming the regional status quo – House of Al-Saud’s control over Mecca and Medina – of a Muslim center of power, this also affected what kind of Islam would be supported in Muslim diasporas.

Diplomatic alliances with the mid-19th century French state came at the price of the Korean King’s agreement “to tolerate Catholics, including French missionaries, on Korean soil” (Baker, 151). Equivalents can be seen in European tradeoff of cultural cooperation and recognition of Islam in exchange for trade openness and oil price stability in the mid-1970s. As a matter of diplomatic and commercial expediency, European governments tolerated Muslim missionaries and began to grant Muslim minorities equal recognition with other major religious communities.

²¹ Hopwood, 309
²² King Fahd formally requested US and UK military intervention in August 1990 to protect against Iraqi aggression (Nonneman, 37)
IV. Theoretical Background

(a) The limits of transnationalism

Transnational religion is an exogenous force on state sovereignty, and its global aspect provides “conflicting claims and empowerments” for citizen-believers. The emergence of transnational forms of Islam in the West, like Christianity and Judaism before it, poses the same sort of challenges to state autonomy as the post-WWII establishment of international human rights norms. Soysal points to international treaties and institutions that created universal conceptions of individuals’ rights, regardless of their citizenship – “a universal model of membership, anchored in deterritorialized notions of persons rights” (1994:2), leading states to extend rights and privileges. Some scholars have therefore argued that Islam’s path to recognition will be just like that of any other religion or minority group claim in a postnational era (Long and Zolberg 1999).

Building on Hammar’s observation of immigrants’ denizenship on a territorial basis, Long and Zolberg see a similar gradual expansion of scope of citizenship to include multicultural difference. They are tempted to see the improved status of Islam in Europe as a routine tale of pluralist minority incorporation – comparable to the institutionalization of the Spanish language alongside English in some US states, or the inclusion of holidays in alternate-side parking rules or a religious group’s tax exempt status.

Not all governments have multicultural policies or minority recognition for groups along lines of immigrant origin or racial background. But even in political systems where race is not a politically salient organizing principle, or where national origin is subsumed within a universal citizenship, all states have a state-church policy. State-religion policy has developed alongside debates in the early 1990s over the political status of immigrants and citizenship policy, the definition of nationality codes, etc. If there is room for three religions at the “Table of the Republic” (Catholicism, Protestantism, Judaism) goes this reasoning, then there is room for four. Soysal shows how state-sponsored internationalization of human rights has had the unintended

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23 (Sewell 1992 in Soysal 1994)
24 Yoon and Zolberg 1999; [or the extension of affirmative action to non-blacks – Skrenntny 2002]
25 as the historian Maurice Agulhon has written (and been widely quoted by J-P Chevènement while interior minister).
consequence of modifying states’ own monopolies over the granting of certain rights. This model of individual rights to representation “undercuts the importance of national citizenship by disrupting territorial closure of nations” (Soysal 164).

Religious belonging, too, has persistently posed challenges to the meaning of territory and citizenship by setting constitutions in competition with a higher law. Rosenblum (1998) refers to this as the “painful conflict between the obligations of citizenship and the demands of faith.” Transnational Islam has provoked state activity not only by leading governments to grant religious rights to members of a polity, but put another way, also to try and abridge the degree of obligations of individuals who have “one foot in the city of God” (Rosenblum 23). In McConnell’s memorable paraphrasing of Rousseau: “your citizenship can be in Heaven or in France, but not in both” (2000: 92). Wanting to wear the headscarf in schools, Markell argues, is no more than “the desire to be included in mainstream French institutions without thereby having to violate [religious] obligations” (Markell, 169).

Following liberal democratic revolutions of 18th and 19th centuries, European nations aimed to weaken the influence of transnational Catholic network by eliminating its monopolistic or dominant position in state-church discussions. Napoleon and Cavour recognized religious minorities, and subjected the Catholic clergy to a civil code, taxing or seizing their property and wealth. The ecclesiastic conspiracy against the new regimes was not entirely a figment of these state-builders’ imagination – the papacy under Pius IX was a reactionary state that opposed the advent of godless rule. Well before the gradual separation of state and church, religious minorities (beginning with Jews, and later Christians and Muslims) had posed a particular set of problems stemming from their refusal to obey what Rousseau calls the “law of the vanquished”: the customary obligation to convert upon military defeat. The refusal to recognize the god of the majority makes religious minorities’ loyalty as citizens forever circumspect and begs the question of whether the beliefs of religious individuals undermine the legitimacy of the state. Consider Brown’s summary of arguments against Jewish emancipation:

(1) [Their] fealty to another (higher) god and another (higher) legal order preempts their fealty to the Christian or secular state
(2) [They] live a partial [religious] life, and do not … participate in the universality the modern state is held to embody.
(3) [Their] religion cannot be easily rendered a purely private affair – holiday requirements, as well as public worship and prayer, contour their daily civic life and thus prevent them from the eligibility for tolerance, available to Protestant sects, in which religion can be rendered a purely individual and private order of belief … Community, law and/or ethnic affiliation leak into the domain where the abstract and universal equality, liberty and community of man are held to reign. (2003, 28)

Faced with a dual system, priest and prince, Rousseau asks, can believers be trusted which to choose? “The sacred cult of Christianity aimed to become independent of the sovereign, and had no natural or necessary bond with the body of the state …far from attaching citizens’ hearts to the State, it detaches them from it as from all worldly things” (Rousseau 126 and 128).

IV (b) “A man in the streets and a Jew at home”:

**The Detransnationalization and Privatization of Religious Faith**

Governments’ offer to Islam of a “seat at the Table of the Republic” during the second period (1989-2004) is as much a reminder of state’s centripetal agenda as of its pluralist tendencies. The state’s desire for community interlocutors is about fitting religious organizations into round pegs of the interior ministries’ religion bureaus. Institutionalization, the assignment of political status to interest groups, “is always two-sided in its effects…

Groups gain advantages and privileges although… they have to accept certain constraints and restrictive obligations… They gain access to government decision-making positions … but are subject to more or less formalized obligations, for example, to behave responsibly and predictably.

States have always behaved as though they can do something about the place of religion in the public sphere, and European states sought to de-transnationalize Catholic and Jewish communities in the past. The religion bureaus of contemporary European interior ministries structure and mediate the relationship of citizens and their (chosen or native) religion: to “ensure that the centrifugal push of religious loyalties that transnational religious regimes foster does not grow strong enough to overcome the centripetal pull toward national unity that the state must nurture” (Baker, 154). These bureaus are the administrative tools to “deal with the demands that their relationship with the rest of the world has placed on [a state’s own] policy towards religious believers among their own

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26 Even in victory or bravery, Christians are soldiers of the priest, citizens of the Church – they fight for a *spiritual country* (130). “They know how to die rather than to win” in war, since for them, “the essential thing is to go to heaven” (129).

27 … and to refrain from any nonnegotiable demands or unacceptable tactics (Offe 1981, 135)
citizens” (Baker, 156). By institutionalizing religion, states convey their interest in the westernization of religious belonging: “in a theological sense, i.e. its dogmatic content” and “in forms of religiosity: the relationship of the faithful to a universal liturgy” (Roy, 2003, 20).

We can see contemporary centralization and institutionalization of Islam as damage control in defense of national unity. The mechanisms of reterritorialization and “de-transnationalization” are not new to Europe: these states initiated similar institutionalization to resolve the dilemmas of loyalty and identity in the 19th century (Brown, Markell, Albert). Enlightenment thinkers from von Dohm to Mirabeau suggested that emancipated, domestically oriented Jews would make for more useful members of society as full citizens (Parekh 2002; Elon 2002). Ironically, recognizing the existence of the community may “redraw the very configurations and effects of power that they seek to vanquish” (Brown in Markell 127 and 145). Yet community recognition represented the first step towards emancipation, incorporation and dissolution of the religious minority into the national polity. According to one of Friedrich Wilhelm II’s minister’s, in 1808, emancipating the Jews would “undermine and abolish their nationality, and gradually… produce a situation in which they will no longer seek to form a state within a state” (Markell, 135). Markell describes the logic of emancipation as a “double-bind” between Prussian Jews and their new government: the positive act of recognition thinly concealed the state’s aims of domestication. Emancipation was a contract – a tradeoff that served the designs on sovereignty of both Group and State. “The recognition of difference [was] an instrument of, rather than a threat to, sovereignty…The law secured recognition for the Jews, yet it also secure recognition for Prussia by placing Jews into a new relationship with the state” (Markell 31 and 138).

IV (c) The Specificity of Islam

Many scholars have pointed to the structure of religious community in Islam to explain its difficulties relating to institutionalization in Western Europe, and suggest that governments cannot expect to handle it in the same way as Catholicism and Judaism (Soper and Fetzer 2002; Warner and Wenner 2002; Rémond 1999). The failed attempts to find a single organization that can “communicate and negotiate” on behalf of a religious
community are due to inherent organizational obstacles within Islam itself.  This is usually contrasted with Catholicism, which has ready-made spokesmen and a clear chain of command. Islam has no pope, no clergy, no decision-making assemblies that can serve as an interlocutor.

Government officials in German Ländere ascribe the fruitless search for an interlocutor among Muslims of Turkish origin to Islam’s organizationally diffuse nature (Laurence 2001). French and Italian governments have likewise expressed impatience or pleaded impotence while Muslim organizations fail to unify underneath a common umbrella. It is the case that some Muslim communities in Western Europe have resisted the notion of nominating a universal representative for Islam in their adopted countries, judging it to be foreign to Islam’s non-hierarchical, decentralized character.

This is partly due to Islam’s organizational structure, in which organizations spontaneously “spring up” (Rudolph, 253). Nonetheless, the difference in the way Catholics and Muslims organize the transnational transfer of religious resources can be overstated. Whereas Catholic “charity” relied on “formally constituted components of a hierarchical structure,” Rudolph writes, “Islamic philanthropies are more spontaneously founded and funded, not part of a hierarchical or monocratic system.”

Many of these same voices say Islam represents a different challenge, furthermore, because its structure and ideology do not “admit a natural distinction between religious community and civil and political society,” thus adding to its incompatibility with western political systems (Rémont 1999; Koopmans and Statham, 2004).

In contrast to Catholicism, the Islamic religion is not conducive to large-scale collective action. Save for the Shi’a, adherents of which are scarce in Europe, Islam is a decentralized, non-hierarchical religion with multiple, competing schools… there is no unifying ideology, there is no central authority to enforce cooperation or structure activity, nor is there even a single Islamic doctrine with which all Muslims from a particular country or ethnicity can identify. (Warner and Wenner, 5-6)

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28 Quote from René Rémont (1999); cf. Warner and Wenner
29 e.g., “Presbyterian organisms” of the Protestant churches (Interview, G. Long, Jan. 03)
30 Zakaat “has nothing to do with the borders of countries,” one Tunisian Islamist is quoted as saying, “The Islamic movement relies on this individual sharing, financial participation.” The Washington Post, August 2, 1993, Monday, Final Edition, FIRST SECTION; PAGE A1, 3279 words, Radical Movements Thrive on Loose Structure, Steve Coll, David Hoffman
31 (Rémont 1999); warner and wenner: “like the Catholic Church until Vatican II (1962-1966), Islam makes no theoretical distinction between religion and any set of political institutions”
Warner and Wenner complicate this view by noting that in Sunni Muslim countries, where the vast majority of these immigrants are from, “a body known as the *ulama’,* the national collection of religious scholars and theologians who are responsible for the content and direction of Islam within that state.” But they note that these *ulamas* are do not have legal standing in the Islamic system of any other Muslim state, setting the stage for a competitive relationship among different national variants of Islam. Indeed, mosques, madrasas, hospitals, bookstores, are sometimes transplanted by the representatives of a formal institution abroad, and may well be nurtured by competing centers of Islamic religious and political authority.

But many Muslim organizations in Western Europe do not pursue all available options for legal recognition because of trade-offs in terms of interference by the state in their internal affairs. Thus many French federations are content with the simple association status of the 1901 law and do not want the status of religious organizations (*cultuelles*) permitted by the 1905 law separating church and state: “the disadvantage of the 1905 law status,” said the leader of one major French Muslim federation, “is that prayer space can only be prayer space, whereas the role of mosques in France is not just in prayer. A mosque has a social role, it is a welcoming space where talks and meetings are held.” This is especially true because recognition as would limit ability to receive financing from abroad. “Islam has a historical handicap – the state pays for the maintenance of churches that were in place in 1905 France, whereas Islam came afterwards.”

Similarly, some German and Italian Muslim organizations do not aspire to sign an *intesa* or gain corporation status (*Körperschaftsstatus*), which would allow them to collect church taxes (*kirchensteuer* or *otto per mille*). “The financial advantages of corporation status are not so dominant or existential for us,” said the chairman of the Central Council of Muslims in Germany, which has simple association status. “Especially

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32 Warner/Wenner: Furthermore, there are four "schools" of law in Sunni Islam; though each has areas of the Islamic world where it is dominant, they co-exist in many places and practice mutual acceptance of judgments

33 Interview with Fouad Alaoui, sec.gen. UOIF, June 2002

34 This issue could be addressed, Alaoui said, by “a new openness in 1905 status that allowed Islam to make up for its late arrival [using French state funds] and have the effect of limiting foreign countries’ financing.”
when we consider that such status would bring infighting along with it – the internal structure of Muslim communities is not made for this and it would cause more damage than good.\textsuperscript{35} “We’re used to paying our own taxes,” said the leader of an Italian Muslim federation.\textsuperscript{36}

But the issue of precise legal status is a separate question from the general organization of government interlocutor, which has many benefits and potential for influence for the religious representatives who are included in the consultations. There exist many Muslim federations who aspire for state recognition and the rights that come with being religious representatives. “The demand for recognition emanates from intermediaries who pose as representatives of a community that would be made real through its legalization:

The strategy of these associations is to be recognized as interlocutors by local administrations and the State as a way of officializing their version of Islam and spreading it in return amongst the local Muslim population” (Roy 2002, 117)

\begin{flushright}
\textsuperscript{35} Interview with Nadeem Elyas, June 2000, Vorsitz.ZMD; [see also Nour Dachan, Interview July 2001] \\
\textsuperscript{36} Telephone Interview with Nour Dachan, July 2002, Sec.Gen UCOII
\end{flushright}

V. The Institutional Perspective

The options for public legal status that are available clearly influence the path of institutionalization (Offe 1981; Minkenburg 2003). Some scholars have relied on a strictly national institutional perspective to explain the development of specific institutional forms of consultation with Islam. They argue that cross-national differences in state-church regimes—which are the product of state secularization, toleration for Protestants and Catholics, Jewish emancipation, etc.—“reveal how host states and their foreigners encounter each other” (Soysal, 5). The very presence of Muslims “threatens the inherited relationship between the Christian churches and the state in each country.” Soper and Fetzer find, therefore, that the outcomes of religious incorporation and secularization reflect accepted “[national] ideas about the role of religion in public life” (2002a; 2003). “Political disputes over religion,” they write, “will inevitably be played out through church-state patterns inherited from the past.” In this view, state-church regimes are thus considered simply as a subset of group-state organization within state apparatus, analogous to European states’ “incorporation regimes” (Soysal 1994;
Koopmans and Statham 2000). Church-state relations reflect “different collective modes of understanding and organizing membership in host polities,” and provide an opportunity structure for religious groups that aspire to public recognition or support for their activities (Soysal 25). The question from an institutional perspective then becomes, what does “emancipation” mean in a given national context: do religious minorities encounter the state as corporatist groups or as individuals? (Soysal 37-8).

The fundamental right to freedom of conscience and religious practice exists throughout contemporary Europe, but state-religion regimes generally fall into one of three ideal-typical categories that roughly map European division amongst “secular, Protestant and Roman Catholic countries”: separation/universal (France, Netherlands), concordatario/recognition (Italy, Germany, Spain), and national church (UK, DK, NO) (Ferrari 2002; Frégosi 2000; Champion 1993; Messner 1999).

**National Church models (United Kingdom, Denmark, Norway)**

In the “national” model, the state recognizes and finances only one religion, though other religions may obtain simple associational status and a lower tier of rights available in common law. National church systems have a state church, which receives preferential treatment but is subject to state influence in its leadership.

**Concordatario / Recognition models (Italy, Germany, Spain)**

In concordatario regimes, “relations with religious groups are regulated through bilateral provisions, negotiated between the state and each religious group” (Ferrari 2002) concordataire. In the “recognition” model, religious communities can apply for recognition or sign protocols in the framework of sometimes hierarchical but pluralist church law—sometimes known as a regime of ententes.

**Germany**

In Germany, organizations aim to qualify for corporation status at the Land level—as a corporation of public law (Körperschaft des öffentlichen Rechts, or KöR)—in order to collect church taxes from their members, or as officially recognized religious communities (Religionsgemeinschaft)—which can be granted by an administrative court to qualify to teach religion in public schools (Amiraux 1999). Eventually, corporations may sign a contract (Staatsvertrag) with state parliaments, which allows for further

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37 (Minkenberg, 197)
public financing. Article 137 of the Basic Law (actually held over from the 1918 Weimar constitution) places responsibilities for religious communities squarely in the control of individual Länder. Thus Muslim organizations have general status of a registered association (eingetragener Verein, or e.V.) but no specifically religious status. Corporation status is not obligatory for associations to be treated on an equal basis with religious communities. Federations may also receive corporation status from the federal government (Catholics, Protestant and Jewish communities), but the competences and funds of the national government in religious matters are very limited. Thus the main negotiations are at local-state level between local Muslim associations and the governments of the sixteen Länder.

**Italy**

In Italy, the interior ministry grants recognition to a juridical partner (ente morale) with whom a government commission (located within the presidenza del consiglio, or prime ministry) can negotiate and sign a religion treaty (Intesa), as allowed by Article 8 of the constitution. An intesa can only be negotiated with Italian citizens (only 2-3% of Muslims in Italy are citizens), and with the formally recognized juridical subject (ente morale). This requires that the major federations unify under a single umbrella organization because the state considers it undesirable to have multiple negotiating tables for a single religion. The agreement can be seen as a “bilateral instrument” allowing for mutual recognition of a religion and the state—a “mini-concordat.” Once the presidenza del consiglio approves it, it is usually submitted for approval by the parliament, and becomes state policy.

**Separation / Universal models (France, Netherlands)**

Finally, in the “universal” model, the lay state is not in the business of recognizing or financing religions, but it regulates religious activity and accords certain

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38 The lone recognized Muslim Ente Morale, ironically, is the Moschea di Roma (1974), whose administrative board consist mostly of ambassadors from Arab-Muslim world (and Yahya Pallavicini).

39 Simple status of Associations, federations – but no legal standing to negotiate on behalf of any community or religion. An intesa is signed with the religion, and not with a given community (see Long – confessioni diverse…)

40 A movement against the multiplication of Intese following Craxi’s reforms (1984-7) led to a bill on Libertà Religiosa, which would obviate future Intese by granting specific rights to all religious communities – eg, cemeteries, ritual animal slaughter, Friday prayers, etc.; but bill has been stalled for at least five years
status and rights to religious organizations and their leaders (France; Netherlands: verzuiing/pillarization) – this is sometimes referred to as a separatist regimes (France, Ireland, NL), finally, neither concordat nor state church.

**France**

In France, a 1905 law (art.2) states that religions are “neither recognized nor subsidized.” “Ethnic or religious communities are not officially or legally recognized categories” (Soysal citing Lochak 1989). This process converged around the recognition of interlocutors – the creation of national and regional Councils that regroup numerous associations and federations (recognized through 1901 law and its 1981 amendment allowing foreigners to form associations; 1905 law on religious associations). Though highly centralized, above all it is a channel of communication. Its powers are informal and limited by political circumstances, e.g. the capacity for consensus among signatories. The resultant consistoire is not an ulema or religious authority so much as a conduit to inside and outside worlds of religion.

<table>
<thead>
<tr>
<th>Finance</th>
<th>Representation / Govt. Access</th>
<th>Institutional Equality</th>
<th>Special</th>
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<tbody>
<tr>
<td>Indirect:</td>
<td>• Tax exemption on charitable contributions and bequests</td>
<td>• Legal Status of Religious, Political and Social Associations</td>
<td>• Organization of Aid El-Kebir (annual ritual slaughter of lamb)</td>
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<td>• Creation / Maintenance of Prayer Spaces (e.g. favorable municipal loans)</td>
<td>• Körperschaft des öffentlichen Rechts – D</td>
<td>• Hajj allocation (country’s quota for pilgrims to Mecca)</td>
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<td>• Culto Amesso – I</td>
<td>• negotiation for headscarf cases?</td>
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<td>• Association Cultuelle Loi 1905 - F</td>
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<td>• Executive consultation</td>
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<td></td>
<td></td>
<td>• community relations (new year’s greetings, etc.)</td>
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<td></td>
<td></td>
<td>• Interior ministry consultation (or Culture ministry)</td>
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<td></td>
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<td>• practical matters relating to exercise of religion</td>
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<tr>
<td>Direct:</td>
<td>• Religious tax collection - in Germany and Italy:</td>
<td>• Contractual:</td>
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<td>(e.g. Kirchensteuer-Germany, Otto per Mille - Italy)</td>
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<td>• Intesa - I</td>
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<td>• Consultation - F</td>
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In each national case, local and national governments have taken initiative to centralize religious representation of Islam alongside other established religious communities. These legally personified institutions would serve as interlocutors for local and national governments where religion meets the public sphere, in the same way as
Catholic dioceses, Protestant federations, Jewish consistories have done for over a century. The organizations oversee life cycle events (birth, marriage, divorce, death), the material needs of minions (prayer space and leadership, ritual animal slaughter, cemeteries), a presence in state institutions (military, hospital and prison chaplains), and serve as symbolic leaders in times of international or domestic crisis.

VI. The Domestication Effort: beyond transnational and institutional perspectives
(a) Limits of the institutional approach

A strict adherence to an institutional perspective leads to rather thin predictions regarding the interaction of Muslim organizations and the state during the second period. Soysal asserts that Muslim associations “adopt predominant national organizational models and communicate with the host societies’ institutions” (1994: 115). A “more centrally-organized Islam emerges” in states that provide opportunities and incentives to do so, such as the Netherlands – where “corporatist regimes expect each migrant group to be represented by its own national organization, different political orientations are compelled to unite under one umbrella federation” (Soysal, 87). Using this same reasoning, Fetzer and Soper predict “hostility” to Islam in France but “accommodation and compromise in Germany” (2002b). Yet we find similar debates over the place of religion in the public sphere across national cases (e.g. religious education, headscarves); and institutional opportunities for some form of organized Muslim representation, in effect, exist everywhere.41

There is a further reason why strict adherence to an institutional perspective is unsatisfactory for understanding dynamics of state-Islam interactions. It fails to consider “underlying policy goals,” or the ways in which ideas of the role of religion in public life can change over time (Bleich 2003). De Galembert has shown how state attempts to reduce foreign influences and place Islam within a national organization structure come up against general trend of “denationalization of host societies which are themselves

41 In the French state’s view, for example, young girls’ wearing of the headscarf incarnates the negative influences of an organized transnational movement (Weil 2004). In Germany, opposition to the headscarf crystallized around the theme of equality of the sexes in addition to the proselytization aspect that French government finds objectionable. In Italy, however, where nuns receive special dispensation to be photographed with their habits on national drivers licenses, the headscarf has been altogether less controversial. Religious education: contrat d’association in France; religionsunterricht in German (selbstverständlich);
affected by globalization” (De Galembert, 224). Ironically, the progressive
disestablishment of the Catholic Church is taking place at the same moment as Islam’s
institutionalization. Thanks to technological advances of globalization, European
integration and increasing regionalization of culture, one author argues, “Muslim
integration into national societies is no longer a simple question of assimilation into a
stable national identity” (Lubeck 2002). “Certain forms of [Islamic] revivalism come at
the same time as religious decline and secularization – an identity claim at the very
moment when the definitions of religious community and its boundaries are in crisis”
(Roy 2003, 22).

Most crucially, studies of policy legacies also ignore what could be called the
supply-side of transnational religion: cross-border religious communities that operate in a
multi-leveled organizational structure. The Islam consultations can be seen as European
states’ management of the “reverse flow” of transnational religion, inward to the West
(Rudolph, 3). Europe is on the receiving end of transnational religion: if Dominicans in
the United States “adopt a parish” in their country of origin, in Europe it is a wider
transnational community in the form of government foreign missions and transnational
NGOs –the umma – that “adopt” and sustains parishes in France, Germany and Italy.

The relevant actors are not limited to the domestic arena, and thus constitute an imperfect
match for the analytical lens of national state-church regimes. In fact, we are witnessing
the European state in action at three levels of claims-making. This takes place at the
crossroad of state-society relations and interstate ties with a mix of representatives from
competing centers of religious authority: domestic (associations), international
(diplomatic) and transnational (non-state).

VI (b) The Supply-Side of Transnational Islam in Western Europe

To understand contemporary efforts to domesticate transnational Islam requires
consideration of how transnational and institutional perspectives interact. Governments
aim to deliver the incentives for a negotiated settlement that is acceptable to transnational
organizations, foreign governments and domestic organizations. These three categories

42 Levitt 2001; This phenomenon is not unlike the expansionist behavior of Christian and Jewish
transnational networks throughout 19th and 20th century, whether Protestant or Catholic missionaries in the
Levant, or the Alliance Israelite Universelle in the North Africa and the Ottoman Empire (Eickelman
1997).
generally correspond to conflict in home countries between international-minded Islamists, official state Islam and finally, those who want to live their religiosity in (typically apolitical) peace. Any attempts to organize Islam that fail to appreciate the necessity of a three-way settlement among these forces have been confounded.

**State Islam:**

With the exception of Saudi Arabia and Pakistan, Roy observes, the classic Islamist movements in the Muslim world have abandoned internationalism, and have entered politics as a national force against domestic radical influences (Roy 2002). Some regimes (Israel, Egypt, Jordan, Algeria, Turkey, Syria, Tunisia, Morocco) viewed Islamic activism “as a means to counter secular leftist influences, and until the early 1980s many Islamist groups benefited from state support or at least tolerance” (Eickelman 33; Blaschke 1989). The Turkish government viewed the Qur’anic education movement’s “aggressive nature,” for example, as “helpful against the organized Left” (Blaschke, 303). Many of these states “re-islamized” their national laws and officialized religious practice in the public sphere: the creation of a national clergy, religious schools and faculties.

This is institutionalized in the form of an official mufti in Egypt, a directorate of religious affairs in Turkey, a ministry or Islamic non-profit organization in Jordan and elsewhere, e.g., in Morocco or Algeria, who have a monopoly over the designation of imams at grand mosques and in religious education. These measures were taken in order to limit the spread of unapproved preaching (*prédication sauvage*). There have been unintended consequences of the officialization of religion in the Muslim world. In particular, the personnel of official state Islam is necessarily drawn from a religiously conservative –if politically loyal— observant base (Roy 2002, 44).

**Transnational Religious Networks**

Non-governmental organizations based in the Arab-Muslim world –such as the Muslim World League (Saudi Arabia), the Muslim Brotherhood (Egypt and Syria), Refa party (Turkey), Jam’at-I Islami party (Pakistan)— maintain the “international nodes” of transnational forms of Islam (Eickelman, 37). These are not simply political movements, Roy writes, but also a sort of religious brotherhood; “they aim only to attack the symbols of impious rule, not to construct an Islamic state” or take power. These movements were able to spread in Western countries through the 1970s and 1980s, Roy argues, thanks to
globalized migration and communication technologies (2002). The commonality among these Islamist organizations is their broad ideological outlook regarding the “inseparability of religion and politics” and their recruitment patterns, which attract individuals “far removed from traditional ulemas,” or religious authorities (Roy 2002, 29).

**Domestic Federations**

Rival umbrella organizations at the national level regroup local associations, and are often local branches of international networks described above. They take advantage of specific, national legal framework, work towards political integration in the host country and for the most part participate in national Islam consultations: they make the choice of “nationalization,” such as the UOIF which changed its name from Union of Islamic Organizations *in* France to *of* France (Etienne 2000; Roy 2002, 35).

It is useful to delve briefly into the background of prominent religious international NGOs, government missions and federations of national associations. A look at the brief descriptions and diagram below describes the major transnational religious actors of Islam in Europe and shows how intermingled these levels are in fact. Not all religious networks are included in this graphic; these are the largest politically active ones. The list is incomplete, but gives a sense of the landscape. (An asterisk* denotes NGOs, though some receive major governmental funding.)
## Muslim Transnational Religious Organizations in Western Europe

### (France, Germany, Italy)

<table>
<thead>
<tr>
<th>International Non-governmental</th>
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<tbody>
<tr>
<td>Muslim Brotherhood (MB) (1928) [Egypt]</td>
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<tr>
<td>Muslim World League (MWL) (1962) [Saudi Arabia]</td>
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<th>Regional Non-governmental</th>
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<tr>
<td>Federation of Islamic Organizations of Europe (FIOE) (1989) [MB/MWL]</td>
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<tr>
<td>Islamische Gemeinschaft Milli Görüş (IGMG) (1976/1985) [Turkey]</td>
</tr>
<tr>
<td>HASSAN II Foundation (1990) [Morocco]</td>
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<tr>
<td>Tablegh/ Jama’at Islami (1926) [Pakistan/ India]</td>
</tr>
<tr>
<td>Religious Affairs Directorate (DIB) (1950/1982) [Turkey]</td>
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<tr>
<td>ALGERIA</td>
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<td>MOROCCO</td>
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<th>Domestic Non-governmental</th>
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<tbody>
<tr>
<td>Union of Islamic Organizations of France (UOIF) (1983) [FIOE]</td>
</tr>
<tr>
<td>Central Council of Muslims in Germany (ZMD) (1986/1994) [MB/MWL]</td>
</tr>
<tr>
<td>Islam Council / Milli Görüş / Islamic Federation - Germany (IR/MG/IF) (1976-1990s) [IGMG/MWL]</td>
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<tr>
<td>Italian Islamic Religious Community (COREIS) (1993) [eur.hum.]</td>
</tr>
<tr>
<td>Association of Italian Muslims (AMI) (199X)</td>
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<tr>
<td>Tabligh Adda’wa - France (AEIF) (1963) [Jammat I Islami]</td>
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<tr>
<td>Islamic Center - Germany (IZ) (198X)</td>
</tr>
<tr>
<td>National Federation of Muslims in France (FMNF) (1983) [Morocco]</td>
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<tr>
<td>Grand Mosque of Paris (GMP) (1926/1982) [Algeria]</td>
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<tr>
<td>Turkish-Islamic Directorate for Religious Affairs (CCMTF/DITIB) (1982-1999)</td>
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<tr>
<td>Islamic Cultural Center of Rome (CCI) (1966/1974) [MWL/ Morocco]</td>
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<tr>
<td>(Foreign) Governmental</td>
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<td>(Foreign) Governmental</td>
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<td>(Foreign) Governmental</td>
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</table>
VI (c) : The Three Organizational Levels of the Supply-Side

These three organizational levels with which European states must contend are not always easy to distinguish, since national federations receive financial support for their activities (e.g. providing prayer space and religious leaders) from embassies and non-state networks, alongside any membership contributions. The religion budgets of national governments themselves, additionally, may be topped up through strategic alliances with international NGOs (e.g. subsidies to Turkish or Moroccan ministries from the Saudi Muslim World League). Many of these groups may “share the goal of ‘reislamization,’” Eickelman writes. But “the links are multiple, fluid and subject to severance at short notice,” as happened during the first Gulf War (Eickelman, 37). Roy finds that the state-oriented movements of “official Islam” are slowly losing their connections to the various diasporas. He points, for example, to weakened ties between the Turkish Refah party and the Milli Görüs movement in Europe, whose European branches have a hard time following the politicized developments and party schisms – they have other interests than the composition of a coalition government in Ankara (Roy 2002, 34).

International NGOs: the Muslim Brotherhood and the Muslim World League

The two most influential international organizational networks are the Muslim Brotherhood (Ikhwan al-Muslimin, MB), of Egyptian inspiration, and the Saudi Arabia-based Muslim World League (Al Rabita al islamiya al’alamiya, MWL). The MB consists of a loose ideological network regrouping like-minded leadership figures, whereas MWL provides formal organizational and financial support to Muslim associations.

The MB was founded in 1928 by Hassan al-Banna (1906-1949) in Egypt, the intellectual and political center of Islamism. The MB aimed to Islamize society from below by taking control of religious, academic, cultural and social institutions. In the words of al-Banna: “Islam is faith and religion, country and nationality, religion and state, spirituality and action, book and spade.”43 There was a crackdown on the movement under Jamal Abd an-Nasirs (Nasser), who took power in 1954, after which many moderate elements of the MB fled abroad. Thus MB branches were established in Syria (under Hasan at-Turabi), Jordan Palestine (Hamas), Sudan, and Iraq, now forming a

43 (Allam, 54)
loose international network. The Syrian branch is influential over Muslim organizations in Italy and Germany: in 1964 Syrian Muslim Brothers founded Islamisches Zentrum in Aachen. The Egyptian branch, in turn, is influential over Moroccan organizations in France (such as the UOIF); the grandson of Hassan al-Banna, Tariq Ramadan, is a respected authority in French Islam, though he is not directly linked to the present-day MB.

The MWL was founded in Mecca as an NGO during the 1962 hajj to support Muslim populations abroad, and was in part the product of a rapprochement between the recently dispersed MB leadership with Wahhabi religious authorities in Saudi Arabia. Saïd Ramadan, the son of Hassan al-Banna, wrote the MWL charter from exile in Switzerland. Its mission statement reads, in part: "to make direct contact with Muslim minorities and communities wherever they are in order to keep them informed, to close ranks, and encourage them to speak with a single voice in defense of Muslims and Islam." Official Saudi control over the MWL aimed to undermine the diplomatic dominance of the League of Arab States in the early 1960s. The organization was conceived as a Wahhabi counterweight to Nasserism and brought together Salafite and Wahhabi groups (and neo-salafites and neo-wahhabis) to this end. King Faisal sought “to enable independent Islamic diplomacy” through commissioners in Saudi embassies, who would serve as representatives of the MWL. The head of Paris bureau, for example, simultaneously served as the MWL’s ambassador to UNESCO. The current MWL president is Prince Abdallah bin Abdul Muhsen al-Turki, former Saudi minister of religious affairs. By 1973, the MWL was the most important financier of Islamic movements worldwide, with Saudi neo-fundamentalist Wahhabism becoming a factor in world politics.

Between 1973-1985 the MWL opened fourteen local offices (makatib), including three in Europe. The MWL currently has 120 offices worldwide and regional Islamic Councils on each continent. Its European headquarters are in London, and an annual meeting of 53 board members from throughout Muslim world (and minorities) is held

---

44 (Steinberg 2004)
45 (Schulze, 260)
47 A total of 25 in 1986: six in Arab world, four in Asia, eight in Africa, five in Europe, two in the Americas. (Schulze, 264)
annually in Mecca. The league established the World Supreme Council for Mosques in 1982 to oversee Mosque construction and maintenance abroad. That Council’s own European headquarters are in Brussels, where it weighs mosque construction projects.

The MWL has a reported government budget of about $30 million annually. It has provided major financing for mosques in Mantes-la-Jolie (€120,000/year), Evry (€9 million between 1984-1995; €90,000/year), Lyon (€4 million), Madrid, Rome, Copenhagen, Kensington etc. and receives around fifteen construction proposals in France each year, from which select about one quarter. During a visit to the Moschea di Roma in May 1999, Crown Prince Abdullah donated $1m for Islamic associations in Italy.

Regional Islam; the example of the Islamische Gemeinschaft Milli Görüş (IGMG)

As we will see in the dissertation’s chapter on organizing Islam in Germany, the chief challenge of German Länder is to keep Turkish DITIB quiescent while politically engaging its rival Milli Görüs (IGMG).

The Islamische Gemeinschaft Milli Görüs (National Vision, IGMG) was originally linked to the Refah party through son of party founder Necmettin Erbakan. Its estimated budget of €40 million is dependent on individual contributions from the 20,000 plus members across Europe and private contributions from Persian Gulf countries. Established in Cologne in 1976/1982 as the Islamic Union of Europe (Islamische Union Europa), it underwent several schisms before becoming the IGMG in 1992. There are currently 14 IGMG branches in Europe, including one in Brussels. The Cologne office

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49 Mozammel Haque et al. “Prince Abdullah Visits Islamic Cultural Center of Rome,” Muslim World League Journal, June 1999, Vol.27, No.3; –initial commitment of 10b lire ($5m)- largest mosque in Europe, holds 2000),$50m total donation
51 (cum Fazilet, cum Saadet) in Turkey, the less successful offshoot that gains only 3% in national elections (AKP, the other spinoff, gets nearly 40%)
52 Dues of €10/month from 20,000 – €200,000/month income (Feindt and Steinbach 1997).
53 Be: 2 offices; NL: 3 offices; France: 4; CH: 1; Austr: 2; Ital: 1; Member of “europäische Gelehrtenrat” (is this CEFR?)
is responsible for finances, while the Bonn office (1994) oversees religious issues and mosque construction (called the Union of the New World Outlook in Europe, EMUG).

Local Milli Görüş branches (called Islamic Federations in Germany) have emerged as a major organizational force among Turks in Europe, principally as the arch-rival of the Turkish state’s directorate for religious affairs (Diyanet Isleri Baskanligi, DIB), whose foreign branches (DITIB) are the Turkish government’s religious caretaker of Turks abroad. Wherever there is Turkish immigrant minority throughout Europe, DITIBs offer shelter for existing or newly-founded Turkish-Islamic cultural organizations. The DIB thus indirectly controls half of all Turkish mosques (or about 1,100) in Europe. The IGMG defines itself in contrast to the DITIBs which consider themselves as foreign organizations operating under diplomatic cover, and which the IGMG view as an obstacle to integration:

We consider ourselves to be an Islamic religious community in Germany, which cares for the social and cultural needs of its members, which as an immigrant organization also has political functions. Since our claims are addressed to politicians. But we do not wish to be treated as a foreign organization or as Turkish political party. We see ourselves as a community established in, and concentrated on, and developed in the context of Germany and Europe.

Local Milli Görüş branches organize rival Hajj trips, billing them as the only one truly accepted by god (and charge 700DM more).

Transnational Nongovernmental Islam: the example of the Unione delle comunità e delle organizzazione islamiche in Italia (UCOII) and the Union des Organisations Islamiques de France (UOIF)

The chapter on Islam in Italy will discuss the Italian government’s struggle to keep the Muslim World League from sabotaging consultations with other federations that are under sway of Syrian offshoots of the Muslim Brotherhood. The government’s other main task is to convince the UCOII to accept the presence of the COREIS, a Sufi (mystical Islam) organization run by a group of Italian converts. The UCOII, much like

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54 Diyanet Isleri Türk-Islam Birligi (DITIB)
55 The CEM Vakfi, also state supported, aims at influencing religious practices of Turkish Alevites (Lemmen 2000)
56 (Lemmen 2000)
57 (Maréchal, 32)
58 Telephone interview with Secretary General of IGMG, Mustafa Yeneroglu, October 2003
59 (Steinbach, 40)
its sister federation UOIF in France, is one of the main grassroots forces to be reckoned with in contemporary Italian Islam.

Founded in 1990, the UCOII represents a typical branch of a transnational NGO, since it is vertically linked to the London headquarters of the Federation of Islamic Organizations in Europe (FIOE).\textsuperscript{60} The UCOII leadership consists of former students from Syria, Palestine and Jordan, many of whom have been targeted by the authorities in their respective homelands because of their activism with the Muslim Brotherhood.\textsuperscript{61} UCOII president Mohamed Nour Dachan escaped an assassination attempt by Syrian secret services sent by President Hafez Assad in the 1970s. Though the leadership of FIOE branches in France (UOIF) and Italy are habitually referred to as being close to the Muslim Brotherhood, the FIOE itself has had no organizational links with the MB since 1991. In addition to funding it receives from the FIOE, 70 individual affiliated Islamic centers that run 120 prayer spaces (roughly half of those in Italy) pay €250/year in dues.

The Union des Organisations Islamiques de France (UOIF) is the French branch of the FIOE. Headquartered in a defunct factory in the Parisian suburbs, the federation was founded in 1983 as a rejection of the Grand Mosque of Paris’s monopoly of representation, and as a result of other schisms amongst dissidents of “official” Franco-Algerian Islam.\textsuperscript{62} It federates approximately 250 of the many cultural, religious and professional associations that have appeared since the 1981 reform that allowed foreigners to found associations. It claims control over 150 prayer spaces, but directly owns less than a third of these.\textsuperscript{63} The UOIF also runs a small theological seminary. Its current president and general secretary are both from Morocco, and both came to France to pursue advanced degrees in Bordeaux.\textsuperscript{64} Though the organization has no formal links to the MB, its president has used an MB slogan in interviews (“The Qur’an is our constitution”) and its general secretary meets regularly with a roving MB ambassador in Europe. UOIF representatives go on regular fundraising trips to the Gulf states and Saudi Arabia, partly with the help of the French offices of the Muslim World League and

\begin{itemize}
\item \textsuperscript{60} in Ancona, on model/framework of Unione degli studenti musulmani (Perugia 1971, itself tied to MB); FIOE is presided by Ahmed Al-Rawi, an Englishman of Iraqi origin
\item \textsuperscript{61} (Allam and Gritti 2001)
\item \textsuperscript{62} emerges from Groupement Islamique de France, itself a result of the scission with AEIF
\item \textsuperscript{63} (XT) (Expr)
\item \textsuperscript{64} Its administrative council is known as the “Moroccan axis” that counterbalances the Algerian-dominated GMP.
\end{itemize}
private donors. There are conflicting accounts as to whether it is one-third or two-thirds foreign financed, but the organization’s directors speak openly of their wish to decrease their dependence on foreign aid. The federation maintains a “policy of non-intervention” with regard to its donors: the UOIF independently owns and administers the prayer spaces paid for with Saudi or Gulf-state money. The UOIF has sought to dispel any ambiguity that its sympathies lie with its adopted country, however, and in 1990 changed its name to the Union of Islamic Organizations of France (rather than “in” France).

State Islam: the Grande Mosquée de Paris (GMP) and the Diyanet Isleri Türk-Islam Birligi (DITIB)

The chapter on institutionalizing Islam in France, finally, documents the French governments’ attempts to retain support of Algeria, while enhancing the role of archrival Morocco (via the UOIF and FMNF) in the state’s consultation with Islam.

The Grande Mosquée de Paris is the oldest and most revered of Muslim institutions in France. The French government constructed this religious sanctuary as a gesture of gratitude to Muslim soldiers of the Empire who died for France in the World War I. The mosque was built in the fifth arrondissement of Paris and personally inaugurated by the French President in 1926. An association attached to the Mosque was placed in charge of holy sites in French Algeria. Though its first board of directors included Algerians, Moroccans, Tunisians and Senegalese, it gradually came under Algerian domination in the two decades that followed that country’s independence. In 1982, the Algerian government took over responsibility for the GMP’s finances and began using the mosque as a conduit for spreading its official state Islam. The GMP currently receives around €750,000 annually from Algiers and perhaps another €100,000 in revenues from its certification of halal butcheries in France. The GMP is organized

65 Saphirnet.info “L’UOIF et l’organisation de l’Islam de France”, (Nicolas Mom 14 april 2003); Ternisien, Xavier, Un budget encore très dépendant des "généreux donateurs" du Golfe • LE MONDE | 12.12.02
66 Ternisien, Xavier, Un budget encore très dépendant des "généreux donateurs" du Golfe • LE MONDE | 12.12.02
67 but its Arabic name did not change: fee Faransa (Fregosi ? or Roy ? XT)
68 First proposal for a Mosque in Rome was made to Mussolini in 1936 “as a place of prayer for subjects from Italy’s short-lived African empire.” But commitments to Vatican that Catholicism was state religion led him to refuse permission. – Philip Pullella “Grand Mosque Coming Up in Rome,” Muslim World League Journal, Oct/Nov 1989, Vol.17, Nos.3&4
69 It briefly held a monopoly of halal certification under the interior ministry of Charles Pasqua (1993-1997)
as a federation with five regional Muftis, and it controls 250 prayer spaces and associations around France. The rector has authority over 150 imams (just over 10% of all Imams in France), most of whom are imported from Algeria.

Alongside the GMP, one can look to the Turkish directorate for religious affairs (DIB) for the quintessential model of state Islam. Founded in 1950, this special administration in the prime minister’s office is responsible for the construction, administration and staffing of mosques (60,000 clerics), the organization of qur’an courses, and publication and censorship of liturgy. It underwrites prayer space abroad through local DITIB offices, staffing them with diplomats from Turkish consulates. Its prayer spaces in Europe are considered sovereign Turkish territory; when they join the DITIB umbrella organization, the property is transferred to DIB and comes under the control of Turkish interior ministry. The DIB’s mission statement is to “instill love of fatherland, flag and religion,” and a portrait of Atatürk in offices or foyers of prayer space. Like Algerian state Islam, the DIB lays claim on all Turkish citizens living abroad; the president of DIB in Turkey is the honorary chairman of every DITIB, and he may participate in DITIB membership and executive meetings.

In 1995 Germany, DITIB employed 760 imams, each of whom are hired with statute of public servant and salary from Turkish state for six-year terms. The French branch established during the late 1990s (CCMTF), once the Turkish population had grown to critical mass, partly in response to its rival Milli Görüs’ having opened an office there. Like the GMP, the Diyanet, has a secular outlook and actively supports the separation of Islam and State; also like the GMP, the Diyanet is though to have entered into occasional strategic alliance with its apparent nemesis, the Muslim World League in order to counter organizational influences competing for its constituency.

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70 (it is not technically a ministry though its budget is larger than some ministries)
72 (Lemmen 2000)
VII. Conclusion

The primary empirical analysis of the dissertation reconstructs the second phase of regulating Islam in Western Europe (1989-2004), when European governments began to pursue policies of incorporation that encouraged an “Islam of” and not just “in” their societies. This entailed the encouragement of domestic associations as well as the creation of “western” forms of religiosities, e.g. through training institutes for imams. State consultations seek to address fundamental questions relating to their Muslim citizens’ transnational relationships. Who speaks urbi et orbi for Islam? Whose fatwas will carry the weight of encyclicals? The custodians of Mecca and Medina, ie the Saudis, through the sages and sheikhs of the Muslim World League? Or, rather the thirty sheikhs on the European Council of Fatwa and Research, run by the Federation of Islamic Organization in Europe, which is loosely linked with the Muslim Brotherhood?

Casanova argues that papal control over nomination of bishops with his nuncios was the “single most important factor in papal control of the transnational Catholic church” (206). Similarly, the exportation of religiously trained leaders from the Muslim world has also been a tool of foreign embassies and transnational networks alike. Only one of every ten imams is a French citizen, and it is thought that only one-quarter are proficient in French language; the respective percentages are even smaller in Germany and Italy. Those who have received formal training usually attended one of three universities in the Arab world. Can legitimate religious training of European imams only take place in the esteemed Islamic universities of the Arab world, eg. Al-Azhar University (Egypt); Al-Qarawiyyin (Morocco); or Al-Zaytûna (Tunisia)? Making use of their governments’ religious affairs bureaus, China, Japan and Korea “de-transnationalized” Buddhism, Christianity and Islam by “bringing them within state corporatist regimes. Allowed them to operate on the condition that they sever foreign

73 [In the west, Roy writes, decision to follow a fatwa is “absolutely personal and voluntary, not the object of coercion” (2003, 21)]

74 The European Council for Fatwas and Research (Conseil européen de la fatwa et de la recherché) Founded in March 1997 in London, but now headquartered in Dublin, the ECFR focuses on the adaptation of Islamic law (fiqh) to the realities of the Muslim presence in Europe, or what is called the “jurisprudence for the minority.”
connections… accept state control of appointments and finances” (Rudolph, 247). The “insistence on financial and institutional independence from transnational religious regimes led to a reorganization of Chinese Protestantism (1951) and Catholicism (1957). European requirements are not as stringent with regard to Islam but there beneath these consultations lies a desire for a degree of domestication as well as regulation of flows of money (Debré 1997).

European governments’ state-religion policy aims to influence the kind of community identity or collective claims-making. In a sense, French Republicanism resembles Japanese Shintoism: “no matter what their religious affiliation, affirm certain propositions about the special status of the emperor and the nation” (Baker 1997). The French government promotes a sacred, “Shinto”-like credo of official state secularism (laïcité). Governments may find it preferable to use “corporatist solutions” rather than encourage the electoralization of community interests (Modood 1999).

The state’s task in the second period has been to dislodge the established interests without overly alienating those who have something to lose. And without sacrificing the valuable contributions that foreign states can make to the stability of Muslim populations: “France is afraid that it will lose control of the organization of Islam. It prefers to ask these states to take care of it, because they are capable of controlling Islamist movements and know the reality of Islam.”

The unresolved questions regarding European Islam’s relationship with the larger Muslim world recall the “tensions between Roman, national and increasingly global character of ecclesiastic institutions… between particularity and the claimed universality of doctrinal principles and moral norms” (Casanova, 215). State consultations are set up to facilitate structures in which these questions can be answered with greatest amount of consensus. Any success at eliciting consensus from the major centers of Islam, however, works somewhat against the nature of Muslim organization. Even if elite-level bargain can be struck, no guarantees that the base will follow. From the point of view of the state, Rudolph writes “elite-controlled is more predictable and manipulable, but religion from

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75 In 1941, Japan forced all Protestant denominations in Japan – Presbyterian, Congregationalist, Methodist, Luther and Baptist – to set aside their differences and join in the United Church of Christ (Baker, 152); French Protestants had already done this between 1904-6: the Fédération Protestant.

76 Interview (June 2002) with Hakim El Ghissassi, founder of La Médina magazine and press
below less so. High religion lends itself more readily to formal or informal pacts with the state; religion from below is amorphous… hard for states to monitor, to control or to bring into a regularized relationship” (252).

Consultations are a sign that European governments want to move away from these models of heavy reliance on foreign governments. “The French authorities have come to understand the risk of associating themselves with countries of origin whose aim is to maintain, through the exploitation of religion, authority over the population which had escaped their control” (Leveau 1993, 104). The second phase of incorporation (1989-2004) is about undoing the power arrangement of the mid-late 1970s that privileged Saudi Arabia and Arab sending states in national organization of Islam in Europe. Using interview material from 150 interviews with bureaucrats, politicians and religious community leaders conducted by the author in France, Germany and Italy between 1998 and 2003, the empirical chapters of the dissertation reconstruct the precise trajectory of political negotiations and institutional designs of Islam councils that have taken shape in the second period.

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77 although: The education minister of North Rhine Westphalia, for example, traveled three times to Ankara to negotiate religious instruction in local public schools; Interior minister of France traveled to Cairo for sheikh Tantawi’s approval of headscarf ban;
## Appendix 1

### Approximate Muslim populations and Muslim prayer spaces (2003) in F, D, I, UK

<table>
<thead>
<tr>
<th>National Origin (first and second generation immigrants)</th>
<th>as % of Immigr Pop</th>
<th>Muslims as % of Total Population&lt;sup&gt;78&lt;/sup&gt;</th>
<th>Places of Worship</th>
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<tbody>
<tr>
<td><strong>Germany</strong></td>
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<tr>
<td>Turkey 2,370,000 (2.1mSunni; .5mAlawite)</td>
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<tr>
<td>Bosnia 283,000</td>
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<tr>
<td>Iran 125,000 (Shiite)</td>
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<tr>
<td>Morocco 109,000</td>
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<tr>
<td>Afghan. 86,000</td>
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<tr>
<td>Pakistan 60,000 (Ahmadi)</td>
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<tr>
<td>Palest. 60,000</td>
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<tr>
<td><strong>Total</strong> 3,300,000</td>
<td>40%</td>
<td>3%</td>
<td>2,300</td>
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<tr>
<td><strong>France</strong></td>
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<tr>
<td>Algeria 1,558,000</td>
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<tr>
<td>Morocco 1,000,000</td>
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<tr>
<td>Tunisia 350,000</td>
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<tr>
<td>Turkey 315,000</td>
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<tr>
<td>Africa 250,000</td>
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<tr>
<td><strong>Total</strong> 5,500,000</td>
<td>75%</td>
<td>8%</td>
<td>1,500</td>
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<tr>
<td><strong>UK</strong></td>
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<tr>
<td>Pakistan 750,000</td>
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<tr>
<td>Bangladesh 200,000</td>
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<tr>
<td>India 150,000</td>
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<tr>
<td>Turkey N/A</td>
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<tr>
<td>Malaysia N/A</td>
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<tr>
<td><strong>Total</strong> 1,500,000-2,000,000</td>
<td>40%</td>
<td>4%</td>
<td>1,000</td>
</tr>
<tr>
<td><strong>Italy</strong></td>
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<tr>
<td>Morocco 150,000</td>
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<tr>
<td>Ex-Yug. 100,000</td>
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<tr>
<td>Tunisia 50,000</td>
<td></td>
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<tr>
<td><strong>Converts</strong></td>
<td>40,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong> 750,000 – 1,000,000</td>
<td>75%</td>
<td>1.5%</td>
<td>400</td>
</tr>
<tr>
<td><strong>Total</strong> EU-15</td>
<td>15-17 million</td>
<td>5%</td>
<td></td>
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</tbody>
</table>

<sup>78</sup> citizens and non-citizens

<sup>79</sup> Including naturalizations and converts

<sup>80</sup> only half are of voting age; including those of North African descent
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