Religion and the Political Organization of Muslims in Europe

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Some analysts have raised serious concerns about the foreign and domestic policy implications of the large numbers of Muslims living in Western Europe. The fear is that Muslims as a bloc will co-opt the domestic and foreign policy of various European states, subsuming it to those of Muslims from a variety of Islamic states in the Middle East and Asia, and transform the secular nature of most European states. The historic and ingrained fear of Islam present in the populations of Europe (and, for that matter, the United States) has produced an inability to see the political nature of Islamic groups, especially outside the Islamic world. For example, both Europeans and Americans were quick to question the political motives and actions of Muslims in Europe and the U.S. when there was no organized and orchestrated condemnation of the attacks of September 11, 2001. What such critics fail to take into account is precisely one of the themes analyzed in the paper: the myriad divisions found among the Muslims of Europe. Western fears and criticisms are partly based on serious ignorance of the characteristics of Islam and of the people in Europe who adhere to it. Because Islam is a highly decentralized religion, it is structurally biased against facilitating large-scale collective action by its adherents. The one version which is hierarchically organized, the Shi’a, is barely present in Europe. In addition, Muslim immigrants are divided by their ethnic differences. Islam, being decentralized, allows for a myriad of practices in the different countries from which the immigrants came. Divided by ethnicity and by their own religious beliefs, Muslims in Europe will not constitute a group which will be able to impose its goals on European foreign and domestic policy. Muslims will, instead, be a diverse population with which European states find it difficult to negotiate, because of Islam’s decentralized structure.

On Sunday, February 15, 2004, a group of approximately 2,000 Muslim women gathered in the streets of Paris to protest the recent passage of a law banning the wearing of the hijab (a religious headscarf) in French public schools. A few thousand more rallied in the southern city of Lyon. It was expected that this new French law would generate controversy. However, in a country with 4.5 million Muslims, it was surprising that so few turned out to protest the law, despite the widely held belief (whether accurate or not) that it directly targeted Islamic immigrants. Nonetheless, this episode is more symptomatic of a general phenomenon regarding Muslims in Europe despite their increasing presence throughout the region, Muslims have had a difficult time collectively organizing to assert (or defend) their interests in the political arena. European governments seek, as they have historically with other major religions, to find in their European Muslim communities a single, broad-based representative (peak) organization with which to negotiate and plan. They have met with little success: Muslims are fragmented into a myriad of organizations. Meanwhile, states keep trying to facilitate peak organizations. Why, regardless of strong incentives to organize collectively and despite direct attempts by governments to facilitate collective organizations, have Muslims remained an organizationally disparate political constituency throughout Western Europe?

This is not to say they have not affected policy and politics, and certainly there are fears in the U.S. and the E.U. that Muslims have the potential for mass mobilization and to undertake large-scale political action. Approximately 15 million Muslims live in Europe, and some of them have advocated creating an Islamic state there.
Writing of Muslims in Europe and America, Daniel Pipes stated, "Of course, to build an Islamic society means taking political power. And while this is remote, it is just foreseeable." Pipes, perhaps taking the quote out of context, continues: "A French woman of North African origin..."

Omer Taspinar writes that "Europe's Muslims hail from different countries and display diverse religious tendencies, but the common denominator that links them to the Muslim world is their sympathy for Palestine and Palestinians. And unlike most of their Arab brethren, growing numbers of Europe's Muslims can vote in elections that count." Taspinar worries that "this political ascendancy threatens to exacerbate existing strains within the trans-Atlantic relationship." Writing in *Foreign Affairs*, Robert S. Leiken predicts that "the Muslims of western Europe are likely to be distinct, cohesive, and bitter." Timothy Garton Ash fears that European Muslims could be "radicalized by events in the Middle East" and that their numbers could soon reach a tenth of the European population. The implication is that Muslims as a bloc will soon dominate the foreign and domestic policies of European states.

Yet in the face of Western wars against the predominantly Muslim countries of Afghanistan and Iraq, the continuing Israeli-Palestinian conflict, bans on religious symbols, and continued social and economic discrimination, Europe's Muslims have remained organizationally fragmented. While there is no question that they have had a political impact in Europe, it is legitimate to ask why this has not also taken place through large interest groups. Muslim immigrants have not formed their own encompassing organizations as Muslims to gain representation in the democratic policy process. In no Western European country has a dominant Islamic organization emerged that speaks with authority for the Muslim community, nor is there any successful pan-European Islamic organization.

Despite fears of a “clash of civilizations” on European soil, religion has failed to be the unifying focal point of Muslims in Western Europe.

**Why?**

We argue that the structure of Islam impedes collective action by Muslims. The general lack of broad organizations results primarily from the decentralized institutional structure of the Islamic faith. This factor is exacerbated by the diversity of national origins found among European Muslims. When the structural features of Islam are combined with the obstacle of overcoming entrenched national identities, the possibilities for broad-based collective action on religious grounds are limited.

Again, that does not preclude Muslims from having influence in Europe through other means, as the Madrid bombings and the murder of Theo Van Gogh have shown. Some Muslims have run for political office, others have rejected standard political channels. The fact that Muslims have difficulty organizing large representative groups to participate in the political and policy process, and have no hierarchy to define the religion for all adherents, may be one factor fueling the more extremist views and actions of those who lack standard channels of participation and are politically impotent. Given the importance of Muslims to Western politics today, it is crucial to understand their capacity for political organization on the basis of their religion. Surprisingly little attention has been given to the political impact of the institutional features of organized religions, even though it is widely acknowledged in political science that “institutions matter”. This paper explores that proposition in the context of Islam in contemporary Europe.

Catholicism and then Protestantism have long been an organizing feature of political and social activity in Europe. That has led, many times in the past, to difficult if not bellicose relations with non-Christian faiths and with secularizing states. Although there have been small Muslim communities in Europe in the past, a significant change has occurred, largely through voluntary migration, in just the last quarter of the twentieth century: in terms of nominal adherents, Islam now ranks as the third largest religion (after Catholicism and Protestantism) in Western Europe. It lags far behind these two in gaining political and social legitimacy and public policy support, as well as in being a unifying factor for Muslim political participation. In Germany, even though the state proclaims its willingness to recognize and fund an Islamic peak organization, the Muslim community remains divided into at least a hundred different organizations. Although the Muslim Association of Britain claims to speak for all 1.2 million British Muslims, the Muslim Council of Britain disputes this claim and asserts overarching control over 250 separate Islamic organizations, a claim that is equally disputed. In the Netherlands, Turkish and Moroccan Muslims refuse to send their children to the same Islamic school.

In 1990, the French government set up a peak organization for Muslims; it fell apart within two years of formation. Subsequently, in 1993, the French government attempted to establish another umbrella group, but it too collapsed in three months. Remaining committed to the same governance strategy of negotiating with a single religious entity, French officials tried the same approach nine years later, but their efforts were immediately repudiated by prominent Muslims within the country. The council which emerged has been riven with disputes and plagued by resignations of participating organizations. In light of general expectations of the power of religion as a tool of mobilization and in light of Europe’s own history with organized religions, the fragmentation is puzzling.

The peculiarity of this is evident even in a brief contrast with the Catholic Church. When Europe became
something of a hostile territory for the Catholic Church during the era of democratic revolutions, Catholics mobilized and the Church in almost every country organized a large Catholic interest group and eventually supported a Catholic political party.10 The Protestant Churches followed suit. Both denominations used that strategy to counter the anti-clerical policies of various governments, and to obtain parliamentary representation. Muslims in several European countries are now struggling to gain the same kind of policy concessions which the Christian Churches sought and often obtained. It is of course not inevitable that someone who is nominally Muslim will become active in a religious-based organization. What is of interest is that even when Muslims do interact with the political system in order to achieve various goals related to their religion, they remain fragmented. Islam, in contrast to the Catholic and Protestant Churches, finds itself politically and socially represented by an incredibly diverse set of groups, and has almost no links to, or influence in, existing political parties. To understand why, we must add an understanding of the structure of the religion and the ethnic divisions of its adherents to more standard accounts.

**Alternative Explanations**

**De jure exclusion from the political process**

Before exploring the structural features and problems of national identity that we consider important barriers to successful political mobilization among European Muslims, we must first address a number of other hypotheses that suggest themselves. Perhaps the most immediate explanation for the lack of national political organizations among Muslims is that most of them are not citizens of the countries they reside in and hence cannot participate in the political process. Consequently, there is little incentive to bear the costs of creating large interest groups. The percentage of Muslims entitled to vote is relatively small, hence political parties regard them as negligible assets at best.11 The fact that most of the nominal or devout adherents of Islam in Europe are immigrants or their immediate descendants, whose status as “European” continues to be questioned, creates an incentive for politicians to avoid association with them. As Jytte Klausen notes, European “party ideologies are not always a comfortable fit for Muslims.”12 Whereas most Social Democratic and Green parties tend to be more receptive, ideologically, to immigrants and tend to promote human rights, Conservative and Christian Democratic parties tend to be more supportive of religiosity and religious institutions. However, these parties generally have been uncomfortable with, if not at times hostile to, Islam. At one extreme, Muslim political activity has led to calls for Muslims’ eviction (e.g., from France’s National Front) or has even resulted in their actual expulsion. During the 1970s France deported thousands of Muslims for “disturbing the public order.”13 While European parties may not be natural conduits for Muslim political participation, that alone does not account for the absence of peak Islamic organizations.

While providing some leverage in explaining the lack of organization among Muslims, this first-order explanation is somewhat misleading. Many Muslims, especially in France, are citizens and do have the right to vote.14 There are places, the Netherlands being one, where the immigrants have been encouraged to participate in local politics, and have been allowed to vote in local elections regardless of their citizenship status.15 And regardless of their citizenship status, Muslims have either joined existing smaller interest groups, or organized some of their own. None of these groups has been all-encompassing of Muslim interests, though. The question here is why, in each country, have they failed to organize a peak religious interest group through which they can collectively voice their policy demands? This first explanation is even more problematic when one considers that some European governments (e.g., Netherlands, France, and Germany) have tried actively to integrate Muslims into various aspects of the political system, including voting, office-holding, and similar civil rights even when they are not citizens.16

**Low religiosity**

A second plausible answer to why Muslims haven’t organized effectively is that only a minority of Europe’s Muslims are intensely devout, and thus most are uninterested in organizing around a broad Islamic political identity. Instead, facing racism and economic marginalization, they organize on the basis of class, ethnicity, or national origin.17 Such attempts have had limited and uneven success.18 Moreover, Islam can still present itself as a mobilizing identity regardless of one’s personal religiosity. Political adherence to an ethnic, religious or linguistic identity is often disconnected from the actual practice of it; for example, many Scots and Welsh identify as such and support their respective nationalist parties though they do not speak Gaelic or Welsh. Jews in Europe and the United States have similar affiliations with a variety of broad political organizations (e.g., the Anti-Defamation League) despite wide variation in religious practice. Similarly, many Muslims identify as such without being intensely devout. But while recent surveys indicate that religious identification and participation are waning among Western Europeans, they show that Muslim residents of the region attach a stronger subjective importance to religion than non-Muslims.19 And most of the myriad interest groups which attempt to represent Muslims are religiously oriented, strive for acceptance of their religion, and wish to obtain public funding for their religious practices.20
**Constraints of existing institutions and resources**

A third answer emphasizes the structure of institutions. It has been widely documented that state structures and traditions affect the behavior of interest groups, including Muslim immigrants’ organizational strategies. Thus, the institutional arrangements and norms of the different host states act as a barrier to the unification of Muslims in one umbrella interest group; further, the variety of separate and dissimilar governmental policies for dealing with immigrants and their European-born children contribute to a fragmentation of the Islamic community. State structures affect the opportunities for collective action and the resources available to actors, thereby altering the costs and benefits to individuals of engaging in collective action. Institutions “channel” individuals into certain forms of collective action. Filtering new immigrants into pre-existing interest organizations that are unrelated to a broader national identity may hinder the ability to craft a broad identity-based association in the future. For instance, many Muslim immigrants became politically active first through the working class organizations that early on were available to them. Only as European states expanded the scope of activities that immigrants could participate in, and only after they allowed for family reunification, did they begin organizing Islamic groups. With immigrants dispersed across pre-existing union organizations, linking them into a unified Islamic movement is too costly for political entrepreneurs. An immigrant already represented by one association will be less likely to join another. Furthermore, many host-society organizations sprang up to channel the immigrants’ participation into other, less political, channels. But events have shown that Muslim workers’ relationship with organized labor is often tense and tenuous.

Another group of scholars has argued that some of the most important obstacles to political participation of Muslim immigrants are the constitutional and other legal provisions of the individual European states. States with a clear separation of church and state (e.g., France) have numerous laws and traditions that are quite different from those of a polity which does not have the same legal separation (e.g., Germany). Also, as Rogers Brubaker has suggested, differences in citizenship laws can potentially become a significant factor in both the willingness and ability of immigrants to become political participants on (legally) equal footing with host society citizens. This is what makes the case selection doubly interesting. If Muslims have difficulty organizing across very different types of church-state structures, and different citizenship regimes, the explanation for the difficulty does not seem to be primarily attributable to that factor. Collective action theories suggest that perhaps Muslims are resource poor, and thus face an additional obstacle to organizing. Certainly, many are. Yet the leadership of most existing organizations is educated, bilingual, and skilled at brokering. Lack of resources, particularly in light of the fact that most European states have tried to facilitate the creation of Muslim peak organizations, does not seem to be the key obstacle. No matter what the level of resources, Muslims have religious and ethnically based differences which are a barrier to sustained collective action and the formation of peak organizations.

**State policy**

Following on this is another point, often mentioned in the literature, about how differing conceptions of political participation among the European states affect organizational capacities and strategies. These differing conceptions shape the policies of host states. These policies, in turn, structure the opportunities and obstacles Muslims face, as well as their organizing strategies. Specifically, French political culture expects and promotes participation at the individual level, and has traditionally either deliberately rooted out or actively discouraged “community” representation or political activity. Muslims in France face a Jacobin state and society that have policy barriers, and a political culture hostile to organizing on the basis of a shared religious identity. The 2004 law banning the wearing of overt religious symbols is but one example. Muslims thus tend to couch their claims in the French discourse of universalist rights. The German political culture, on the other hand, has traditionally acknowledged and accepted “community-based” participation and activity, provided the community is constituted of ethnic Germans. Muslims in Germany face a state and society which identifies them as part of a foreign community.

Further, the German emphasis on ethnicity as a basis for citizenship channels migrants and their descendants into organizations that self-identify on an ethnic basis. Yet even Koopmans and Stathan, who find evidence that states shape the nature of claims that ethnic minorities and migrants make, note that “there are limits to the capacities of national modes of minority incorporation to shape migrant identities.” Muslims in France, Germany, and other European countries organize and make collective claims on the basis of their interpretations of Islam. They just do not do so in large, encompassing organizations.

There is a tendency in all of the above arguments to see immigrants as a passive and generally homogeneous lot, one which is more likely to absorb host traditions and pressures than to exert any itself. Immigrants, however, come with their own prior cultural views and socio-political interests that will refract and deflect, to varying degrees, the deliberate or unintended efforts of host societies to mold them. European Islamic communities are more fragmented than state administrative structures, policies and traditions appear to warrant. For instance, Denmark and Sweden have provisions for independent (“free”) schools and churches, based on a minimum size. These minimum thresholds have not prompted the aggregation
of Islamic groups. Rather, Muslims have created a vast and highly decentralized variety of schools and places of worship. These associations reflected “the diversity of the immigrants themselves” as compared to a broad-based (peak) Islamic association. Thus, while state structures may facilitate some organizing activities, they do not adequately account for the wide diversity of those activities or, more importantly, the inability of Muslims to form broad-based, enduring interest associations.

**The structure of Islam and the ‘structure’ of Muslim immigrants in Europe**

By contrast to the above explanations for the failure of Muslims in Europe to effectively organize, we argue that the structure and ideology of Islam itself is responsible for a considerable degree of the fragmentation of Muslims' social and political representation. Islam is not conducive to large-scale, sustained collective action in the European context.

Islam is a decentralized, non-hierarchical religion with multiple and often competing schools of law and social requirements. The exception is minor for its effects in Europe: one relatively small branch of Islam, the Shi’a, adherents of which are scarce in Europe, is centralized and hierarchical. Furthermore, in contrast to Catholicism, Islamic religious leaders have no enforcement mechanisms to obtain obedience from their adherents; there are no sacraments in Islam which can be withheld from Muslims in order to obtain compliance with the wishes of imams or other ‘clerics’ regarding policy decisions which they may support or condone. This is also the case for the Shi’a version of Islam. In Sunni Islam there is no established or universally recognized procedure or mechanism for the removal of specific imams in a local mosque. Islam’s decentralized structure prevents Islamic organizations from making credible commitments about their actions to others. Further, Islam does not provide an organizational structure which can easily give private rewards to those who participate in collective action and which can punish those who free-ride. This lack of hierarchical religious authority is exacerbated in Europe, where there is no embedded Islamic tradition nor state support for a particular religious interpretation and set of practices. In sum, the religion has no central authority to enforce cooperation, punish non-compliance, or structure activity.

Add to this the fact that Islam manifests itself differently across and within cultures and societies, and the result is another major barrier to large-scale collective action. Islam allows for numerous theological and political stances and disputes, including about what the goals and activities of Muslims in non-Islamic countries should be. There simply is no unifying ideology or, contrary to popular imagery, even a single Islamic doctrine with which all Muslims from a particular country or ethnicity can identify.

The structure of Islam, whether of the Sunni, Shi’a, or some other persuasion, cannot be discussed without reference to the country of origin and the ethnic identification of its adherents. One must take into consideration the inter-relationship of the various “brands” of Islam with the country of origin and ethnicity of its members, i.e., the “structure” of the immigrants themselves. Ethnicity provides mobilization tools for political entrepreneurs; because it fosters trust (blood recognition), it reduces transaction costs of in-group interaction, thus facilitates collective action by the group. Without entering into the debate about what ethnicity is, we agree that there is not something inevitable or “essential” about ethnicity. In the context under study, ethnicity does affect individuals and communities by informing and circumscribing their values and preferences, and therefore the breadth of any group they might join or form to advance their political interests. Ethnicity and country of origin create additional barriers to the formation of large, politically active and effective umbrella groups of Muslims in Europe.

This argument shares with some of its rival explanations the view that structure and ideology (also called cultural traditions) have important systemic effects. There is also a shared assumption that individuals, including those believing in a religion, will behave rationally when attempting to achieve their goals. Where this argument differs is in its highlighting the structure of religion and how it affects the organizational capacity of Muslim immigrants, rather than, for instance, stressing the administrative structure of the host state.

The remainder of this paper explores the structure of Islam through a comparison of Muslim organizations and organizing strategies in contemporary Germany and France. For definitional purposes, we consider ideology and theology to be parts of a religion’s structure. Germany and France are good cases because they are host to a large number of Muslims, to significant organizing activity by Muslims, and to an immigrant population disproportionately drawn from one ethnic group—Turks and Arabs respectively. Presumably, that population could serve as the focal point of Muslim organizational activity. Further, both Germany and France have tried to facilitate the creation and success of one umbrella group which could speak for their Islamic population. Conditions would seem to be propitious for the rival hypotheses enunciated above.

The article proceeds as follows: first, we provide a survey of the European reception of Islam, and then a brief outline of the structure of the Islamic religion. Next, the article analyzes the structure and organizational strategies of Muslim immigrants in Germany and France. In the conclusion we suggest that the very structure of Islam may be what maintains it as a vibrant religion for its believers at the same time that it prevents its adherents from creating effective groups for representation in public policy. Consequently, no one organization speaks for Muslims.
or Islam, in any European state. Indeed, Muslims are frac-
tured, fractious and divided along a large number of eth-
nic, national and sectarian cleavages, making it highly
unlikely that they will create a united bloc to influence
policy in any serious way.

The International Context of Islam

in Europe

Islam—as a culture, a civilization, and a perceived menace
to the culture, civilization and political systems of Europe—
has threatened Europe on three separate occasions. The
first of these instances was in the eighth century A.D.,
when the Iberian Peninsula and much of France and later,
even parts of Switzerland and Italy, fell to the invading
armies of the Islamic Empire. This Muslim presence was
slowly pushed back in the eighth to fifteenth centuries,
though the last Muslims in Western Europe as a result of
this incursion were not eliminated or deported until early
in the seventeenth century. The second—in the fifteenth
to the seventeenth centuries—was when the Ottoman
Empire brought Islam into Eastern Europe, specifically
the Balkans, and eventually to the gates of Vienna. The
remnant Muslim populations of this incursion are found
in Bosnia, Yugoslavia, Albania, Bulgaria, and even Greece.39
Resentment and fear at the time was strong, and it has
lingereda.40 Especially in Spain into the twentieth century,
there was still a residual antipathy toward anything Islamic
as far as public policy was concerned.

The recent mass immigration of Muslims into Europe
could be seen as the third Muslim incursion, i.e., the entry
into several European states of literally millions of Mus-
lims, beginning in the 1960s. This time, however, the
Muslims have not been entering as part of an organized
military force. Rather, they have come as asylum seekers,
as immigrant workers, and as illegal aliens. Most came as
individual “guest workers” to supply the manual labor
many European countries had lost as a result of World
War II: Germany worked out explicit agreements with
Turkey, France relied on its ties to Algeria and other for-
er (primarily North African) colonies.41

Conversely, Europe has similarly significantly impacted
the heartland of Islam on two separate occasions. Chris-
tian Europe invaded the Muslim lands for the first time in
the 10th to the twelfth centuries—the era known as the
Crusades; the butchery and barbarian behavior associated
with this incursion continues to have a dramatic impact
on the view of many Muslims with respect to Europe and
the West.42 The second major incursion of the Europeans
took place primarily in the nineteenth and twentieth cen-
turies, when the European states with colonial ambitions,
primarily Great Britain, France, the Netherlands, though
even Italy and Spain joined their ranks, took over Arab/
Islamic lands from Morocco in the west to Afghanistan in
the east. In none of these incursions and invasions was the
behavior of the associated troops particularly exemplary
or humane. Again, resentments and fears at the time were
high, and the historical memory of them has been kept
alive by some political entrepreneurs in the Islamic world.

Muslims in Europe, throughout the centuries of the
relationship, have nearly always perceived themselves as
being in hostile territory. Traditionally commanded by
Islam to add all the Earth to the realm of Islam (dar
al-Islam), the historic (i.e., prior to the present era) Mus-
lim incursions into Europe were generally seen as part of
the destiny of Islam. Post-World War II Muslims in Europe,
on the other hand, entered to improve their economic
status and to escape authoritarian regimes; most did not,
at least at the outset, think they would stay permanently.

Large-scale emigration from former European colonies
and Turkey to Europe did not begin until the 1960s; at
that time, there was little attention paid to the possible
long-term consequences.43 When in the 1970s guest work-
ers became something more like permanent residents, with
family reunifications permitted, “the desire [of the immi-
grants] to cultivate religious tradition and pass it on to
the next generation emerged”.44 In the 1980s, as Islam became
highly politicized in many of the homeland countries,
those conflicts and controversies were played out in West-
ern Europe by some of the immigrants and their organi-
zations. European governments could no longer view Islam
as a peripheral trait of their so-called “guest workers.” And
the immigrants began to realize that to gain for them-
selves the privileges accorded to Catholicism and Protes-
tantism, they had to organize. A sizeable percentage of
the Muslim immigrant population has sought to practice its
faith publicly, adhering to its symbols, such as wearing the
“Muslim headscarf”, following dietary prescriptions, prayer
rituals, marriage patterns, and seeking religiously-based
education.

Doing so has not been easy in Europe. Muslims have
faced barriers to all aspects of their religious practices.
Why have Muslim immigrants not responded to the obvi-
ous benefits of collective organization? Why, despite their
sizeable numbers in Europe, have they not responded by
establishing peak organizations to negotiate with the host
states? Why have state efforts to foster such organizations
failed? An examination of Muslims’ actions in the Ger-
man and French contexts shows that one part of the answer
stems from the structure of their religion.

The structure of Sunni and Shi’a Islam

Islam is a universalist religion, that is, it claims its teach-
ing are meant to apply to all humans in all places at all
times. Rather like the Catholic Church until Vatican II
(1962–1966), Islam makes no theoretical distinction
between religion and any set of political institutions. In
the Muslim conception, religious prescriptions and require-
ments logically entail political activity, for the purpose of
instituting and enforcing God’s commands concerning the moral and ethical behavior of Muslims.

Soon, however, it was obvious to many within the Islamic community that ignoring the distinction was an untenable position, as evidenced by the division of authority between the sultan (temporal leader) and the caliph (religious leader of the Islamic community) not long after Muhammad’s death. Nevertheless, the vision of the ideal Islamic community (under Muhammad’s direction) in which this distinction was not made, continued and continues to exercise considerable influence over many Muslims of various political leanings. When, for example, the modern Turkish state, under Kemal Atatürk, first introduced the distinction in specific legal language, it caused considerable uproar and confusion among Muslims, since its predecessor, the Ottoman Empire and its sultan claimed both roles for all of Islam. In the European context, there are various Muslim leaders who continue to argue that the distinction should not be made, and exhort their followers to ignore it, and others who argue the opposite. This important point of conflict contributes to the divisions among Muslims.

The next important distinction to be made is between Sunni and Shi’a Islam; these divisions in the Islamic faith produce important consequences for organization and institutionalization, though too often Western observers of Islam have been guilty of either exaggerating the distinction, or of misunderstanding the consequences thereof. Sunni Islam, which is the dominant version of Islam in the Middle East among Turks and Arabs, and in much of Southeast Asia, does not, strictly speaking, have any theological organization which is analogous to that of the major institutionalized forms of Christianity. There are, of course, mosques (the equivalent of parish churches) throughout the Sunni Muslim world; these are not, however, arranged in any hierarchy, and the individuals who lead the prayers and deliver the sermons at Friday services need not be and often are not clerics. There is, on the other hand, in every Sunni Muslim country, a body known as the ulama, the national collection of religious scholars and theologians who are, ultimately, responsible for the content and direction of Islam within that state. The point, however, is that they are not responsible for, nor do they have any legal position in, the Islamic system of any other Muslim state. 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 judicial verdicts. In other words, the Egyptian ulama does not have any official position in, does not decide issues of Islamic law, and does not make nor enforce any legal matters in, say, Morocco.

Shi’a Islam, which characterizes Iran, as well as areas of Iraq, southern Lebanon, some of the Persian Gulf states, and Yemen, and from which only a very small part of the immigrant population of Western Europe originates, has a very pronounced hierarchical structure; in the most influential version, the Ja’fari, the structure may be roughly compared to that of the Catholic Church, i.e., mullahs/priests, hojat-ul-Islams/bishops, ayatullahs/archbishops, grand ayatullahs/cardinals. This hierarchical system is also somewhat similar to that of the Catholic Church in that on matters of faith and morals, authority and policy flow from the top down. Thus, Shi’as in Europe are likely to be obedient to directives and policies emanating from the (Ja’fari) Shi’a hierarchy. In general, this is the case, i.e., Iranian Shi’as in Europe appear to have adhered to policy directives from the Iranian hierarchy. On the other hand, as will be shown below, Sunni states have quite commonly established specific national, government-sponsored offices (with ministerial status and regularized budgets) for the purpose of maintaining contact with their emigrant population, and even seeking to influence and control their activities within the European states. The Turkish Diyanet is a good example. Such homeland-sponsored religious institutions do not, however, speak for the entire émigré population.

Indeed, such organizations often further fragment Muslim immigrants. Some of these organizations evolved in the “homelands” in response to European colonial dominance. Their primary purpose appears to be to either gain or retain governmental influence over at least a portion of their emigrant Muslim population. They have primarily used their funds to build mosques, schools, etc., or to provide libraries and other facilities for Muslims. These organizations have been described as “indirect instruments of foreign governments trying to exercise control over their (former) subjects living abroad.” Given the diversity of orientations within Islam and of ethnicities within any one European state, Muslims are too divided to leverage their numbers into effective policy initiation. Indeed, efforts by the sending (homeland) states to influence their émigré populations have exacerbated the differences among European Muslims.

The structure of the Islamic religion, namely the divisions within Islam and its lack of hierarchy, is a significant variable accounting for the generally ineffective efforts of the Muslim immigrants to create a cohesive organization speaking for them in matters of policy towards Islam. To demonstrate this argument’s plausibility, we compare it to the competing explanations discussed above. There are many types of (Islamic) organizations which have sought, or currently seek, to involve Muslims in some aspect of the public life of the contemporary European state. The purposes of such organizations, their membership, their techniques and methods of participation, and the extent to which they have adopted or used European models varies considerably across the spectrum of European states. We review how Germany and France treat religion and how they deal with immigrants, and then we analyze Islamic organizational activity to see the extent it can be explained...
by the (European state) structural variable and to what extent by the structure of religion and the nationality of its adherents.

The Legal Status of Islam and Islamic Political Action in Germany

**Islamic interests in Germany**

In Germany there are dozens of Muslim organizations, not hierarchically nor even horizontally linked to each other. This situation was aptly summarized by sociologist Thomas Vernske: “One of the major weaknesses of the Muslim groups in Germany is the lack of an effective umbrella organization and generally accepted leaders.”

In contrast to the situation of the Catholic and Protestant Evangelical Churches in Germany, Islam has not provided an organizational focal point for its adherents, even though, much more so than ethnicity, it is the sociological category into which most non-European immigrants fall, and has become the boundary marker. The federal structure of Germany did not prevent the Catholic Church and the Protestant Evangelical Church from each being organizationally unified and speaking with one voice when making demands on the state.

**Benefits of organizing**

The German constitution (the “Basic Law”) guarantees religious freedom, including freedom to create religious communities which may then organize their internal and external affairs. Such communities have the right to decide their own internal structure and decision-making, etc., as well as the right to participate in the political life of the country. However, in order to enjoy all of the associated “rights” implied by these statements, the religions have to register as “public law corporations.”

When they achieve this status, they are entitled to receive a share of the religious tax revenues collected by the state from their members, to operate as a civil service employer, to exercise disciplinary power, and issue documents. They obtain a variety of other benefits, including the right to be consulted on matters of public policy which are thought to be within their field of interest. To be able to register as a religion, it must “be an established church,” “have a hierarchical organization,” and have its clergy “appointed independently.” These rules effectively preclude Sunni Islam from ever being recognized as a corporate religion. The only “churches” to have achieved this status are the Roman Catholic, the Evangelical Lutheran, and Judaism; none of the Islamic associations (and there are many) is a public law corporation. Instead, they have registered as “unions” (not in the labor sense of the word): as eingetragener Verein—a status which also conveys some benefits but which does not approach that of a public law corporation.

Education is always a sensitive issue for religious organizations and institutions. In Germany, the state runs most schools, but permits others based on religious principles to also operate. Typically, only the officially recognized religions can set up their own schools. Since Islam does not have that status, legally it is not possible for there to be Islamic primary schools, which is a pre-eminent demand of the Muslim population no matter its other orientations. The city of Berlin, however, allowed a German Islamic school to be established by the Millî Görüs organization. A demand for similar institutions operated by other Turkish Muslim organizations with a different political and social agenda soon surfaced. The most important of these is the Turkish state’s Diyanet (short for Diyanet İslami Türk İslam Birliği, or DITIB), the Directorate of Religious Affairs, originally established to keep Islam out of the political arena but whose purpose and activities clearly began to reflect the pro-Islamic orientation emerging in the political arena.

Instruction in Islam is often provided by representatives specifically provided by the homeland countries (usually Turkey). In at least one case, a German state (North Rhine-Westphalia) took the initiative in developing supplementary curricula for children of Turkish origins, using special teaching materials; all participation in the program is voluntary.

Germany would appear to be the most likely place for a unified Islamic movement to form: the incentives for becoming a recognizable, registered corporate group are strong, and, in contrast to France, there are financial advantages to groups which form on the basis of religious identity.

**Characteristics of Muslims in Germany**

Despite the preponderance of “Turks”, the Muslim population in Germany is made up of diverse groups which in turn are often divided on their practice of Islam. The national (i.e., country) origin of the vast majority of the Muslims in Germany is Turkey—most sources suggest that it is between 75 and 80 percent of the total; however, as table 1 shows, there are some important subcategories among this Turkish immigrant population, and these affect whether and how these Muslims can organize to attain religious benefits.

These distinctions are politically important; for example, the Alevi, though technically Shi’a (but not of the Ja’afari School) are by far the most accommodationist, integrationist group of Muslims in Germany (and some other European states); the Kurds, on the other hand, as a minority in Turkey which has consistently been discriminated against and sought to redefine its position within the Turkish state, overwhelmingly do not affiliate with or associate themselves with ethnic Turks; moreover, the majority of Kurds tend to be integrationist, and they tend to belong to organizations that cater exclusively to Kurdish interests and concerns (at least in Germany).
Characterizing the Muslim organizations in Germany

Muslims in Germany are divided, but not just or even along the lines suggested by the administrative structure of Germany. Although Germany is federally structured with sixteen states (the Länder), Muslims are divided less by that structure than by their differing ideologies and lack of a centralizing hierarchy. The divisions between the Islamic organizations seeking recognition of Islam as a culture as well as a faith within contemporary Germany generally reflect the divisions found within the Islamic world; after ethnicity (i.e., Kurd, Turk, Arab, Afghan), the most obvious and important is between what might be called the exclusivists or separatists, and the integrationists, i.e., between those who wish to create and maintain an exclusively Islamic culture and civilization within Europe (to the extent of creating an Islamic ghetto), and those who wish to accommodate and integrate themselves into the social and political fabric of European society. These divisions are themselves partly based on conflicting interpretations of Islam, something the structure of the religion allows for. These very different conceptions of their place in European society in general, and in Germany in particular, provide a formidable barrier to the cohesion of Islamic groups, preventing them from presenting a united front to the German state in their efforts to obtain the goals which they seek.57

There are four major separatist organizations, defined as organizations which do not accept the institutions of the German state, and which attempt either to segregate themselves into Islamic enclaves, or to promote the Islamization of Europe in general, and Germany in particular. The first among these is the Avrupa Milî Görüs Teskilât- lari, or AMGT (Union of the New World Vision in Europe, or, in German, Islamische Gemeinschaft Millî Görüs), which represents the followers of Necmettin Erbakan, the prime minister of Turkey from July 1996 to June 1997, and the head of the (Islamic) Welfare Party. Politically, it wants to be recognized as an Islamic “church”, and it asks that Muslims in Germany be officially exempted from the secular politico-legal order and be allowed to follow the dictates of the Shari’a instead. It considers any form of integration to be a betrayal of Islam. Its headquarters are in Cologne, and its primary ideologue is Emine Erbakan, Necmettin Erbakan’s sister-in-law. It is alleged to have ties to a number of other Islamic organizations in Europe. It does not have the backing of the Turkish state.58

A second is the Federation of Islamic Organizations and Communities (FIOC, or Islam Cemiyetler ve Cemaatler Birili[u]gi, CCB), which split from the AMGT over the latter’s refusal to recognize Ayatullah Khomeini as the imam of all believers. The FIOC was founded by Cemaleddin Kaplan, the former mufti (an Islamic legal title) of Adana (Turkey), who became a politico-religious refugee in Germany after the 1980 military take-over in Turkey. The organization accepts neither (secular) socio-political “pluralism nor ‘ugly democracy.’”59 Cemaleddin Kaplan, who died in 1995, considered himself and the FIOC to be a part of the worldwide Islamic revolution begun by Ayatullah Khomeini, and he called for a jihad against the Turkish government. Among the most radical Islamist groups of Turkish Sunnis, it suffered a setback when its next leader, Metin Kaplan, was sentenced to four years in prison in 2000 for calling for the death of a political opponent, who in fact was later assassinated. At the time of writing, Metin Kaplan had been deported to Turkey, which intended to prosecute him. The FIOC is fiercely opposed to any cooperation with the German state.60

Another similarly oriented group are the Süleymanlis, an off-shoot of several Islamic mystical orders, the most famous of which is the Naqshbandi. They oppose the secular Turkish state, but are not affiliated with the Diyanet; instead they have created their own organization, the Verband der Islamischen Kulturzentren (known in Turkish as the Avrupa Islam Kültür Merkezleri Biriliği or AIKMB), with headquarters in Cologne. Associated for a time with the Zentralrat, an organization rather more open to dialogue with the German state, it seceded in 2000, and appears to have returned to its earlier, more separatist views under its leader Ahmet Arif Denizoglu (who was once a Turkish MP and member the Welfare Party).61

The Föderation der Türkisch-Demokratischen Idealistenvereine in Europa e.V. (ADÜTDF), or Turkish Federation (Türkische Föderation), began as the foreign branch

<table>
<thead>
<tr>
<th>Category</th>
<th>Numbers of Muslims in Germany (2001 estimate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>3,700,000–4,150,000</td>
</tr>
<tr>
<td>Of Turkish Origin</td>
<td></td>
</tr>
<tr>
<td>Sunnis</td>
<td>2,625,000–3,025,000</td>
</tr>
<tr>
<td>Alevi</td>
<td>2,100,000–2,3000,000</td>
</tr>
<tr>
<td>Shi’as</td>
<td>400,000–600,000</td>
</tr>
<tr>
<td>Sunni Kurds</td>
<td>125,000</td>
</tr>
<tr>
<td>Other Muslims</td>
<td>400,000</td>
</tr>
<tr>
<td>Arabs</td>
<td>350,000–400,000</td>
</tr>
<tr>
<td>Iranians</td>
<td>200,000+</td>
</tr>
<tr>
<td></td>
<td>125,000</td>
</tr>
</tbody>
</table>

Note: These data are derived by creating a statistical average of estimates produced by a variety of German political, social, and religious organizations and publications from the period 1999 to 2001. There are no official governmental data, as no census since 1987 has provided an accounting by religious affiliation. These data have been compared to some earlier estimates by projecting them at an average annual increment of 3 percent; the result accords well with more recent estimates and is in line with birth rates among Turkish Muslims in Germany.

of a Turkish nationalist group, the Turkish Partei der Nationalistischen Bewegung (MHP). In the 1970s, it began promoting a synthesis of what it called a “Turkish body and Islamic soul.” The Türkische Föderation claims to have 200 associations and 10,000 members. It has avoided interaction with other religious and ethnic groups, and shows no interest in integration with German culture.\(^{62}\)

A fourth group of separatist organizations are those associated with several specific mosques and their imams. For example, there is the Ali Mosque in Hamburg—the only significant Shi’a center in Germany, which promotes the goals and policies of the Iranian Islamic Revolution. It is connected to the Twelver Shi'ite Muslims, who run the Islamische Zentrum Hamburg (IZH), which has branches in other German cities. Shites from Turkey have formed their own association and forged a link to the IZH. The IZH opposes democratic pluralism, and also argues that Western civilization is corrupt, anti-Islamic, and needs to be superseded by an Islamic political system. There is also the al-Kuds (al-Quds) mosque, similarly in Hamburg, which was the center of al-Qaeda operations, and whose imam (al-Fazazi) was a major influence in the radicalization of the various Sunni Arabs who supported, participated in and carried out the attacks of September 11, 2001.\(^{63}\) Being Arab and Sunni, however, the al-Kuds mosque’s following was never an active participant in any of the more broadly-based Islamic organizations in Germany. Last, but not least, there is the “Islamic Center” (as it styles itself) in Munich and Aachen—the most segregationist of them all; its leaders have argued that the Muslims of Germany should withdraw into Muslim ghettos, and wait for the eventual “natural” Islamicization of European society. This Center has roots to the Muslim Brotherhood in Syria and Egypt.\(^{64}\)

There are several other smaller organizations whose names perhaps bear noting briefly: the Islamic Harakat (Islamic Movement), which split from the ICCB, and may be characterized as the Sunni Turkish associate of the Hizbullah organization. An interesting case is the Nurcuk Movement (Nurculuk, or “divine light”), which traces its roots to Said Nursi, a dedicated opponent of Turkish secularism; it claimed to want to reconcile Islam with modern technology and science, and that the Quran/Islam could be a rational guide for technological societies. In Germany, it concentrated its efforts in the field of education, providing instructors and establishing schools for Muslim youth, and was therefore included in among “integrationist” organizations. But, then it was unveiled as secretly supporting and promoting the Islamicization of Turkey under its current leader, Fethullah Gülen, who fled to the United States in 1999. Last, there are the German-based associates of such well-known groups as the Front Islamique de Salvation (FIS) of Algeria, the Jihad Islami (associated with Egyptian Islamist organizations), the Islamic Front for Palestine (associated with the Muslim Brotherhood), and many others. Even the separatists cannot agree on how to separate, much less organize, to do this.

Muslims are also split across “integrationist” organizations, defined as those institutions and organizations that seek some form of accommodation, reconciliation between a modern version of Islam with Western culture, civilization (technology) and values (especially the political ones of pluralism, democracy, and participation). The most significant are part of DITIB, the Diyanet’s umbrella organization in Germany—today the largest and most influential (among Turks) of the Islamic organizations, with nearly 750 mosque associations having declared their affiliation. Opened in 1984 in Cologne, it has sought to provide economic, spiritual, political, and religious support for the various Turkish Muslim communities in Europe, and represents the efforts of the Turkish government to retain some influence (if not control) over its emigrant population. Its priorities and personnel have reflected the vagaries of the influence of Islam within Turkey itself, i.e., rather more conservative and activist under the regime of Necmettin Erbakan; rather more detached and apolitical under other prime ministers (e.g., Tansu Çiller, Bülent Ecevit).\(^{65}\)

The Muslim World Congress (Mu’tamr al-‘Alam al-Islami) is also an integrationist organization, the name of which implies unity but whose existence indicates diversity. Launched in 1984, it appears to be associated (intellectually and politically) with the Salafiyya Movement, an association of intellectuals concerned with the reform and revitalization of Islam in the modern world. It accepts the constitution of Germany and its politico-legal system, and has argued that Germany’s Muslims should become fully integrated members of the society in which they find themselves.\(^{66}\)

Some scholars have argued that the localized nature of Muslim organizations shows that the Muslims are merely reflecting the administrative structure of the European states. There are, of course, many local German and immigrant associations concerned with issues such as housing, jobs, education, and discrimination against Muslims.\(^{67}\) It is usually the local authorities who distribute resources, and, in some cases, have the authority to make policy decisions in those areas. Yet these issues can also be handled at the national level, and if those are the primary concerns of Muslim immigrants, they would do well to follow the example of other German interest groups (including the established Churches) in creating a “peak” organization to negotiate with the national level authorities. The structure of the German state does not provide the necessary explanatory leverage. For instance, some Turkish Muslims in Hamburg organized a “Union of Migrants from Turkey” to act as an umbrella group pursuing “minority rights”, “multicultural policies”, and
pressuring for dual citizenship. Indeed, many of the larger cities have established a committee (Ausländerbeirat) in which all foreign residents are represented by proportional representation. In general, however, these organizations are not particularly influential or powerful. The fact that Muslims organize at the grassroots level and fail to connect locally created bodies into an umbrella group is an inevitable by-product of the lack of structural unity in the Islamic religion, particularly as expressed by the immigrant population in Germany.68

In addition, Turkish émigrés have been the targets of the political agendas of a variety of Islamic groups operating in Turkey which thus divide them socially and politically.69 As one scholar states, “Turkish politics divides the federal [Turkish] organizations” in Germany.70

Recent events test the argument. There have been at least two serious efforts to create a peak organization for German Muslims. The first of these is the Islamrat (Islamic Council). Formed in 1986 by the AIKMB (the Süleymancilar) and the Jama’at Un-Nur, its current leader is Hasan Oezdurgan, originally from Turkey. The Milli Görüs federation also belongs. The Islamrat has seen considerable internal conflict and fissions: for instance, the AIKMB left in a dispute about the political orientation of the Milli Görüs. The Islamrat claims it has thirty member organizations and 500 mosques (a more conservative estimate is 23 organizations).71

The second of the current major efforts to create a peak organization is the Zentralrat der Muslime in Deutschland (ZMD), or Central Council of Muslims in Germany, founded in 1994 by Nadeem Elyas, originally from Saudi Arabia and still its current leader. Made up of nineteen member organizations, it claims to have 500 of Germany’s more than 2,400 mosques as members (though this figure is challenged by some German political analysts, who claim the number is no more than 200). The ZMD is viewed by German analysts as a conservative Islamic organization and its full acceptance of the civil and human rights espoused in the German constitution has been questioned. The leader sits on the board of the Islamic Center of Aachen (the Bilal Mosque), which is affiliated with the Muslim Brotherhood of Syria. Likewise, the Islamic Center of Munich, which is affiliated with the Muslim Brotherhood, is a member of the ZMD. The ZMD’s leader claims that Islamic law and its criminal code are only applicable in “an intact Islamic state”, and thus not applicable in Germany. However, his organization has, in the past, said its goal was to have Shari’a law applied to Muslims in Germany.72

Every effort to unite the Islamrat and the ZMD, or even to get them into a discussion for a possible merger, has failed.73 Indicative of the political infighting and disputes over any putative leadership role was the publication, in February 2002, by the ZMD of a statement defining the “bases and principles for relations between

German Muslims and the German State and Community,” which places the onus for additional actions relevant to the status of Muslims in Germany “into the court of German decision-makers”. Termed the “Islam Charter”, the document clearly attempts to pre-empt any other Muslim organization from obtaining a preferred status within Germany.74 The problem is that the ZMD represents only a minority (probably no more than 25 percent) of Muslims in Germany, and that a significant number of other Muslim organizations adamantly and consistently have refused to accept many if not most of the statement’s principles. Although the so-called Charter emphasized that “no contradiction exists between the principles of the German state and Islamic teachings,” it insists upon certain prerogatives for Muslims, something which many Muslims in Germany reject. As one Turkish Muslim leader in Germany has argued, “one must not make the mistake of treating the Islamrat and Zentralrat [ZMD] as the representatives of Muslims in Germany.”75 The decentralized nature of Islam makes these divergences of views and political priorities inevitable. As we argue, efforts to create peak organizations among Germany’s Muslim population have faltered due to the very structure and nature of Islam.

The Legal Status of Islam and Islamic Political Action in France

Ever since the Separation Laws of 1905, religion and the state have been separated legally in France.76 There is no state religion, and no state support of any religion. The operating principle of the French Republic is that “we are a secular state, and we damned well intend to keep things that way”.77 Recent actions by the French state, and a recent report put out by a presidential commission only underscore that stance.78 To the extent that religion in France had a public face, it was predominantly Catholic; the arrival of Muslim immigrants has challenged both the secularity of the French Republic and its claim to impartiality.

In the mid-1980s, experts on European politics began to suggest that Islam would serve as the “symbolic element” for the collective identity of the immigrants.79 Due to the decentralized structure of Islam, as well as the disparate origins of the immigrants, it did not. On March 3, 2004, the French Senate voted to adopt a ban on Muslim head scarves in public schools by an overwhelming majority of 276–20. This vote came just weeks after the National Assembly approved the same bill by a similar overwhelming margin. Although this ban extended to displays of the Christian crucifix and Jewish yarmulke, it is undeniable that the legislation represented a reaction to an increasingly visible presence of Muslim immigrants in France. So why aren’t Muslims in France organizing into a cohesive umbrella group to fight this?
Benefits of organizing

Freedom of religion in France is guaranteed under Article 10 of the Declaration of the Rights of Man and of the Citizen of 1789, the fifth line of the preamble to the 1946 constitution, and Article 2 of the 1958 (Fifth Republic) constitution. It is also guaranteed by many international conventions to which France is a party. All spiritual movements enjoy the liberty to assemble, guaranteed by a law of June 30, 1881, and in Article 2 of the 1901 Law of Association. These liberties may be exercised within certain limits. The first is respect of public order, which is broadly defined as public tranquility, security, salubrity, and morality. French law, and also recently the European Court of Human Rights, has upheld numerous cases in which the French restricted religious activity on the grounds of its being a threat to the public order. The history of the “headscarf law” is a case in point. The second limit on the exercise of religious freedom derives, basically, from Mill’s negative freedom, i.e., one may not do anything which restricts the freedom of others. This is enshrined in Article 4 of the Declaration of the Rights of Man and of the Citizen.

Sects and organized religions may choose to organize themselves as a “non-declared association”, or as a “declared association.” These procedures and categories were established by the Law of Association of 1901. The hurdle to becoming a “declared association” is low: one must make a declaration to the relevant, easily accessible government authority, which includes the title and goal of the association, its headquarters and its establishments, and the names, professions, nationalities and residences of those who are in charge of the administration or management of the association. It must submit its statutes, and put a notice in the public Journal officiel (sort of the equivalent of the Congressional Record only much more detailed). Having done this, an association may own real estate and other property, and receive whatever subventions are available from all levels of government; be paid for services rendered, be a party in judicial cases. The drawback is that a declared association can be audited and can be inspected for working conditions. Many sects in France are “declared associations;” interestingly, most Muslim groups are not. The exception are the 25 recently established Regional Councils of French Muslims (Conseil Regional du Culre Musulman, or CRCM).

Characteristics of Muslims in France

As in Germany, Muslims are divided by nationality or ethnicity; since Islam in the various countries of immigrant origin is different, country-specific Islamic organizations have emerged. In addition, as in Germany, Muslims in France are divided by adherence to particular schools of Islam. While France has large numbers of Algerian, Moroccan, and Tunisian immigrants, it also has many from sub-Saharan Africa, Turkey, and the Asian countries. See table 2.

Table 2
Numbers of Muslim Immigrants in France (2000 estimate), By Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>c. 4,250,000</td>
</tr>
<tr>
<td>North African Arabs</td>
<td>c. 3,250,000</td>
</tr>
<tr>
<td>Algerians</td>
<td>1,500,000</td>
</tr>
<tr>
<td>Moroccans</td>
<td>1,000,000</td>
</tr>
<tr>
<td>Tunisians</td>
<td>500,000</td>
</tr>
<tr>
<td>Other (Mauretania, etc.)</td>
<td>250,000</td>
</tr>
<tr>
<td>Other Arab</td>
<td>100,000</td>
</tr>
<tr>
<td>Other Africa</td>
<td>300,000</td>
</tr>
<tr>
<td>Asia (Pakistan, etc.)</td>
<td>250,000</td>
</tr>
<tr>
<td>Turks</td>
<td>350,000</td>
</tr>
</tbody>
</table>

Note: These totals do not include harkis, French converts to Islam, and similar non-immigrant categories. Since the French census prohibits asking religious affiliation, the estimates of the number of Muslims in France is subject to considerable variation (1.4 to 5 million).

could provide, if they indeed had ever truly been able to do so, a voice in the democratic policy process for Muslim immigrants.

**Characterizing Muslim organizations in France**

The first point to note is that racism proved a weak point for organizational unity. In the early 1980s, young **beurs**, the second generation of Maghrébians (North Africans), launched a number of different organizations aimed at combating racism and at highlighting the “specific injustices and hardships they encountered as immigrant youth.” These organizations were strongly supported by the Mitterrand government, which “channeled considerable funding to immigrant associations, and incorporated some immigrant activists directly into the political process.”

Yet the **beur** groups had differing goals, some seeking to value the Maghrébian culture of the **beur** generation (e.g., Association of the New Immigrant Generation, or ANGI), others more directed at racism (e.g., Rock against Police, Zaama d’Banlieue in Lyon) or deplorable housing conditions and employment prospects. They did not readily identify with SOS-Racisme, established in 1984 by anti-racist activists.

Being first channeled into a trade union and later into anti-racist groups clearly did not prevent the formation of a variety of Islamic groups; indeed, the variety of groups and goals probably not only increased, but also provided more attractive and meaningful alternatives.

President Mitterrand’s tenure in office (1981–1995) effected several striking changes in Muslim immigrant and descendant activity; for example, his government facilitated the formation and recognition of immigrant associations on any basis, including religious. Between May of 1981 and March of 1982, the number of Islamic organizations in France went from seven to forty-two. This is not prima facie evidence that Muslims are fragmented: after all, the Catholic Church has numerous ancillary organizations. The difference is qualitative: the Islamic organizations are decentralized, many lack formal links between each other, and they seldom act in unison. Clearly, the French administrative structure was not a barrier to action. In fact, approximately one thousand associations were created at the national level in the 1980s alone; the gamut of orientations toward the French state most often resemble those of the accommodationist and integrationists previously surveyed in the section on Germany. It was the Islamic religion which proved to be the barrier. Indeed, despite successive French governments’ efforts to create a peak association for Muslims, and thus make it easier for the government to negotiate with Muslims communities in France, disparate Islamic organizations mushroomed, as did the number of mosques. However, with no hierarchy to which these mosques are required to be responsible, they continue to sprout on a more or less ad hoc basis.

The efforts of the French government to develop mechanisms and organizations to channel the political inclinations of the Muslim population were met by the founding of civic and similar associations by the governments of the sending states. For example, since 1962 the Algerian government has sponsored a civic association for Algerians in Europe, l’Amicale des Algériens en Europe (AAE), which was very similar in organization and goals to those created by Turkey and other Muslim states in Germany. The Algerian government has also been a major sponsor and controller of the Mosque of Paris and its attached Institute, built just after World War I to honor the Muslims who had fought for the French. The Mosque’s link to Algeria was authorized, indeed established, by the French state, but became more problematic with the Algerian war of independence and later the Algerian civil war. The Mosque’s success in terms of unifying Muslims in France has been negligible. Turkey, through the DITIB, began sending imams to France in 1980, and has attempted to maintain influence over the Turkish population. The Turkish government’s goal has been to prevent the rise of a politicized Islam. As in Germany, its success in representing (and controlling) Turkish Muslims has been limited by the presence in France of its rival, Millî Görüs, and other Islamic groups.

The failure of immigrant groups to form a unified Islamic group is often blamed on the influence of the French “Republican ideal,” with its emphasis on universalist values and rights, and its Jacobin rejection of particularist communities. Many of the anti-racist groups formed by immigrants were displaced by the founding of SOS-Racisme (by young left-wing non-immigrant French). Its declared goal has been to counter racism and discrimination against all minorities, and it has rejected communitarian-based politics. Many **beur** organizations contend it has failed to represent them adequately, and has diluted or downplayed the real and specific problems the immigrants face.

The extent of the differences in beliefs of Muslims in France is illustrated by the fact that at least one Maghrebian organization, France-Plus, even supported the expulsion from school of Muslim girls wearing head scarves. That organization’s leaders are convinced that Islam needs to be a private affair and that the public sphere is secular. Other **beurs**, running as candidates in the European elections, have explicitly rejected the notion that they might represent their ethnic or cultural community, arguing that to do so would undermine the spirit of the French Republic. Muslim immigrants and their descendants have conflicting views even on what constitutes racism and how to integrate into French society.

The Catholic Church in various European states faced similar biases at an earlier time, yet it had a degree of success in organizing to fight against anti-clerical policies and for what it regarded as its prerogatives. Even in anti-clerical
France, the Catholic Church created an organization to speak and act in policy debates on its behalf. Thus, the evidence indicates that the lack of a unified Islamic group in France owes less to French republicanism and institutions than it does to the diversity of the Islamic community in France and the fact that there is no one Islamic hierarchy to enforce doctrinal and organizational unity. While Paris and Lyon have large “central” mosques, various Islamic groups have disputed over the right to control the former, and many have presented the fact that the latter is basically a Saudi-based institution. Both mosques thus fail to speak to the larger Islamic population. The Paris Mosque is regarded as integrationist and dominated by Algerians. Indeed, one Islamic group whose name advertises unity (the Fédération Nationale des Musulmans de France, or National Federation of Muslims of France—FNMF) was founded in 1985 with the explicit aim of competing with the Paris Mosque for control of the Muslim population. The FNMF was predominantly Moroccan and less integrationist. Another group, the Union of Muslim Organizations of France (Union des organisations islamiques de France—UOIF), founded in 1983, has its roots in North African immigrants with some association with the Muslim Brotherhood. It later developed its own, more independent, yet conservative, version of Islam. It does not advocate a strict separationist strategy, but does believe that Islam should influence and permeate its own, more independent, yet conservative, version of Islam. It does not advocate separation, nor full integration, as the latter, in the French context, threatens the religiosity of the movement. It has had internal divisions. Given that there is little agreement in France’s Islamic community over what it wants and how its goals should be met, none of the Islamic groups has been successful in controlling or representing that community.

The lack of cohesion cannot be blamed only on differences between ethnic groups: the divisiveness persists within each Muslim ethnic group. This is because what further divides the population is, as in Germany, the playing out of homeland religio-political conflicts in the host country. Algerians constitute the largest percentage of Muslim immigrants in France, and they are among the most divided. The Algerian war for independence from France had already put a wedge between Algerians, with some fighting as French soldiers for France (the harkis), and some fighting in the independence movement. More recently, conflicts between the Algerian military government and several Islamic fundamentalist groups, such as the Islamic Salvation Front (FIS) and Armed Islamic Group (GIA), have spilled into France, fragmenting the Algerian immigrants on such questions as nature of the state (secular versus Islamic), on the appropriateness of the politicization of Islam, on the means to achieve ends, and on particular interpretations of Islam.

There have been several incidents in France which might have been the basis for unifying Muslim organizations; perhaps the most well-known is the so-called affair de foulard of France’s bicentennial year, 1989, in which three Moroccan-descent school-girls were expelled from school for wearing head scarves in class. The event created a political and social storm, mobilized numerous Islamic groups, yet failed to bring about their unity, precisely because within Islam are diverse views about the wearing of head scarves, and, more generally, the public nature of Islamic rituals. Another attempt to create a “French Council for Islam”,

The latest evidence for the argument of this article was provided in December 2002. The French state made another attempt to create a “French Council for Islam”,
on the model of the peak organizations which represent the Catholics, Protestants and the Jews (the Bishops Conference for the Catholic Church, Reformed Protestant Federation, and the Central Council, respectively). It has been named the Conseil Français du Culte Musulman (CFCM). Together with Dalil Boubakeur, the head of the Mosque of Paris and the presumptive leader of the Muslims in this proposed partnership with the French government, Interior Minister Nicolas Sarkozy called a two-day meeting to create the new body; it was termed an “historic day” by Boubakeur. The Union of Islamic Organizations in France, the Mosque of Paris, and the National Federation of Muslims in France were to work out the rules and procedures of the new body, in conjunction with the Ministry of the Interior.

Yet many Muslims immigrants from the states where these three organizations have their roots (Egypt, Algeria, and Morocco respectively) immediately opposed the proposed organization. The Mufti of Marseille, Soheib Bencheikh, asked: “Why is the government forcing Muslims against their will into a ‘representative council’?” Abderrahmane Dahmame, President of Coordinated Muslims, said that the new organization was an “affront to all democratic and republic-oriented Muslims, because it includes a large group of fundamentalists and Muslim extremists”; he was also quoted as saying that the proposed organization was being put into the hands of “fascist Muslims and their foreign supporters.” Other Muslim leaders feared that the Interior Ministry was trying to bring all Muslims under state control. Even before any of the details of the proposed institution were made public, there was tremendous unrest and doubts about the new Council. In fact, 30–40 percent of all French Muslims felt left out of the discussions, because they belonged to organizations which Sarkozy did not consult.105 A participant in the negotiations commented that the Council would be “ungovernable” precisely because its executive bureau contained different strands of Islam. Some estimate that the Council reaches only 10 percent of all Muslims in France, and the head of the Mosque of Paris complained about how voting rights were granted: it was according to the square footage of mosques, which, as he noted, favored those built in parking garages and warehouses.106 Elections to it, held in April 2003, revealed the organizational and ideological divisions between Muslims in France. No one group won an absolute majority, and many Muslims derided the results, rejecting the presumptive “winner,” (the UOIF) because it was more fundamentalist and less integrationist than other organizations. The UOIF’s general secretary, Fouad Aloui, nevertheless resigned from the council in May 2005, citing the CFCM’s “incapacity to be effectively a representative of the Muslim religion.”107 Once again, the structure of Islam itself precluded the creation of a genuine peak organization, even when that effort was attempted by an organization as influential and powerful as the French state, and its purpose was to advance the interests of Muslim immigrants.

Even the imposition of a ban on the wearing of religious symbols in public schools has prompted diverse reactions amongst Muslim minorities. The head of the Mosque of Paris, Dalil Boubakeur, supported the ban, the UOIF opposed it. Other organizations were similarly divided on that issue. France has tried to impose uniform boundaries between secular and sacred, religion and the public realm, but the complexity and variety within the Muslim immigrant population has consistently challenged that project.

**Conclusion**

Relations between Europe and the Islamic world have often been antagonistic and unfriendly, or what Samuel Huntington, in another context, somewhat exaggeratedly labeled a “clash of civilizations”.108 This roughly 1200 years of generally mutual antagonism, along with “9/11” and the “3/11” Madrid bombings, have created fears of a “Muslim Street” coalescing around Islam and significantly impacting the domestic and foreign policies of European states. We have argued that this fear is unfounded, based as it is on a lack of understanding of Islam. The decentralized structure of Sunni Islam itself provides a fundamental barrier to collective action by European Muslims. There is no “Muslim vote” in any European state; rather, there is a plethora of Muslim votes: moderates to extremists, separationists to integrationists, all are divided on their political, social and religious strategies and goals. Any political party which attempts to increase its vote share by appealing to Muslims will attract only a thin slice of the Muslim community: on everything from the start of Ramadan to various aspects of the Israeli-Palestinian conflict, from the interpretation of the Quran to interaction with European governments, Muslims are divided, and the organizations which exist to represent them reflect this diversity of views.

The contemporary arrival in Europe of different peoples from the developing areas, but most especially from Islamic states, has ignited a number of dire predictions concerning the future of (secular) European political and social systems, ranging from observers such as Omer Taspinar and Daniel Pipes to novelist Jean Raspail to journalist Oriana Fallaci to politicians such as Jean-Marie Le Pen and Jörg Haider.109 In the most extreme versions, European culture and civilization are deemed unable to withstand the onslaught, and European standards of what constitutes civil society will succumb to this “Islamic threat.” To be sure, Muslims currently in Europe have created certain types of social, economic, and even political organizations, but they have not done so in any unified fashion. There has been a notable lack of success in achieving national policy goals sympathetic to Islamic ideals and goals. It is the structure of the religion, and how...
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...it is interpreted, practiced, and invoked by its adherents from different Muslim states, which is one of the important reasons Muslims' political influence through standard democratic channels remains limited. Even as Europe seems to provide some Muslims with the opportunity to create an Islam detached from cultures, ethnicities, and states, that possibility is confounded by the multiple meanings, practices, and claims to spiritual leadership which the decentralized structure of Islam allows.

The European states with large Muslim populations do exercise a modicum of care in their foreign policies towards Turkey, Algeria, and the other regions of the world from which their Muslim immigrants have come. They do not, however, allow it to determine their foreign policy, and they need not: Muslim opinion about “homeland” politics is, as we have shown, divided. Britain went to war in Iraq in 2003 despite its Muslim community; France did not, partly due to its earlier ties with Iraq and to the Muslim populations in France, but also due to its belief that war was not the way to resolve the Saddam question. Germany's refusal to go to war in 2003 had more to do with the German population's preferences than with those of its (largely disenfranchised) Muslim community. When considerations of power and threat come into play, the views of a divided, strategically weak community are not generally considered.

We are well aware that certain aspects of the domestic and foreign policy of the European states have changed in the aftermath of September 11, 2001. Without attempting a thorough analysis of Europe's relations with the Islamic states, a topic far beyond the confines and purposes of this article, it should be noted that the European states have not made any effort to accommodate or accept the more extreme Islamist goals of certain international movements which claim Islam as the basis for their ideology and goals (e.g., al-Qa'ida), and therefore our primary point remains valid.

Muslims also have other disadvantages to organizing: Islam cannot claim to be a “natural” resident and institution of Western and Central Europe; Muslims therefore face a substantial hurdle to attaining acceptance and legitimacy. Many Muslims arrived as guest workers, whom most in Europe (at least originally) thought would return to their countries of origin. Further, Muslims have often faced stringent racism; their homes have been fire-bombed, individuals have been drowned in rivers by Neo-Nazis, and occasionally brutally murdered. Such factors obviously create barriers to organization. Yet the characteristics of the immigrants—the fact that they are immigrants from different countries practicing a decentralized religion with very different traditions—works against the creation of a unified Islamic movement in any Western European country.

While European governments try to channel Muslims into representative peak organizations, the broader European context facilitates the multiplication of Islamic groups, rather than their consolidation or unification. With their civil liberties and constitutional guarantees of freedom of religion, European states allow the expression of multiple varieties of Islam. This has enabled multiple competing schools and sub-schools of Islam to go public and work to attract supporters, producing a variety of orientations and organizations much broader than that available in most if not all of the “exporting” countries. As one migrant from Turkey said, “Here [Germany] I’ve gotten to know religious communities that are outlawed in Turkey”.

The Catholic Church in many European countries became part of a state-sanctioned religious cartel seeking to eliminate competitors and impose its views on society. The Islamic religion has been an excluded minority seeking to establish itself in foreign territory. Generally, where a religion has a monopoly or is part of a duopoly, it becomes like monopolies in the business world: inefficient and ill-tuned to customer preferences. In such cases, the formal adherence to a religion declines, even if individuals still have a “demand” for religion—just not the one being offered by the monopoly religion. In the case of Islam in Western Europe, one would expect that since Muslim religious leaders cannot take state support or the adherence of “Muslim” immigrants for granted, the religion likely will be more dynamic. No one version of Islam is state-sanctioned, so none can be complacent about having a means of financial support or followers; as a result, they will be more competitive and likely more expressive of the great variety of religious interests of particular Muslim neighborhood communities. Ironically, Islam in Europe may have a greater percentage of active believers than Catholicism. Contemporary studies on this issue are not in agreement; some have claimed a very low rate of devotional activity, while yet others have found that it is quite high.

It may be counterintuitive, but Islam in Europe, a religion which is not protected by state laws and subsidies, may be the one which is more vibrant and responsive to its followers and potential followers. Because of its decentralized structure and lack of hierarchy, Sunni Islam may be even more likely to serve the (Sunni) Muslim immigrant communities in Europe. Its current diversity of organizations, structures and goals more accurately represents and caters to the variations in religiosity and socio-political orientations of the European Muslims than do the highly structured, monopolistic Christian churches serve their Christian constituencies. The political consequence is that the lack of a single hierarchical organization means comparatively less political power. This means that Muslims as a bloc will not have significant influence over European foreign and domestic policies, contrary to the fears of some commentators. But one serious consequence of ineffectual political representation and interaction is that it facilitates the development of radicalized groups reacting to their sense of exclusion. Further, due to the
absence of an authoritative, controlling hierarchy, it is easier for such Islamic groups to develop. As Europe is seeing, a handful of such groups may seek to exercise political influence in other ways.

**Notes**

5. Leiken 2005, 120.
7. The well-known phrase is from Huntington 1993, 22–49. Some scholars have noted that Islam has become a “marker” for immigrants in Europe, just as language (Spanish) is in the U.S. See Zolberg and Woon 1999, 5–38.
9. To European scholars, this may not be a surprise. However, the social science community in the U.S., and the mainstream political science literature in particular, has not recognized this, and Cesari notes that in Europe, there has been a tendency to see Islam and Muslims as monolithic entities. We are not arguing against concerns of Islamic-related terrorism in Europe and we recognize that terrorist groups have been affiliated with political parties. Due to the structure of Islam in Europe, an Islamist party which can significantly influence the domestic or foreign policy of a European state is unlikely to arise. For a European view of Muslim immigrants, see Cesari 2003, 252. On terrorists and parties, see Weinberg and Pedahzur 2003.
15. See Doomernik 1995, 57.
16. See also Soysal 1994.
20. There is an extensive literature on the uses of cultural traits such as language, religion and ethnicity in political mobilization and organization. See Laitin 1986; Zirakzadeh 1989, 318–339; Esman 1977; Hearn 2002, 745–769; Posner 2004.
22. Ireland 1994, 10; Fetzer and Soper 2005.
30. Ibid., 43–5, 117–9; Fetzer and Soper 2005.
33. Ireland 1994, 63–64.
36. Much has been written about the purported fluidity of immigrant/Muslim “identities”. While this article recognizes that identities are malleable, it stresses that, despite the theorized fluidity, Muslims’ organizing behavior is strongly affected by their country of origin/descent and ties to homeland ethnicities.
41. A variety of other European nationalities, most notably Portuguese and Greeks, also constituted part of the “guest-worker” population. The origins and development of this immigrant stream is well-documented in various studies, but see especially Noiriel 1988; King 1993; and Nielsen 1992a.
42. Madden 1999.
43. In 1961, there were only 6,700 Turks in Germany; see Peach and Glebe 1995, 35.
45. In fact, this distinction was often made, including by such respected Islamic scholars as Ibn Taymiyya. Furthermore, compare the role and responsibilities of the caliph versus the sultan in the Islamic Empire at various times and in various places. Nevertheless, this distinction is not clearly understood nor recognized by many contemporary Muslims, not to mention many Western scholars.
The major Islamic university in the world, al-Azhar, located in Egypt, through its graduates who become members of various ulama, has influence beyond the borders of Egypt.

There are, in fact, three major types of Shi’as; they have very different conceptions of the state, “clergy”, and dramatically different views of some elements of the faith. The summary and commentary in the text applies to the Ja’afari (Twelver) Shi’as—the most numerous and influential grouping.

The Rushdie Affair is a prime case in point. Iran tried to appropriate the (non-existent) authority to speak for all Muslims in condemning Salman Rushdie, a Muslim author residing in Great Britain, to death and offering a reward for his murder (for allegedly defaming Muhammad). While a number of Islamic organizations were outraged by the book The Satanic Verses, they seemed equally inflamed that the Shi’as of Iran would try to tell them how to react. Halliday 1992, 71.

Amiraux 1995, 58.

The organizational consequences of ethnic differences among Muslims in France deserves additional research in the future, especially since these differences have led to some serious disagreements on some major issues affecting Muslims, e.g., on education and labor matters.

82 Ireland 1994, 108.
83 Blatt 1995, 156–177, here at 163.
86 Quotes in paragraph from Blatt 1995, 164.
87 The main obstacle in the past had been that foreign organizations “needed to have a minimum number of French citizens in their leadership.” Nielsen 1992a, 120.
88 A telling contrast is that at the same time, the Spanish Catholic Church sponsored the grouping of Spanish immigrant parents’ organizations into one umbrella group, APFEEF (Asociación de Padres de Familia Españoles Emigrados en Fráncia). Ireland 1994, 66.
90 From 131 in 1976 to over 300 in 1979, to 600 in 1984, to 1500 by 1991. Ireland 1994, 71; Kettani 1996, 19. Mosque counting is not a precise business; the number of mosques is estimated to be in the mid-1000s, but many of these are acknowledged to be, essentially, prayer rooms or even gathering places in individual homes, rather than mosques in the full architectural sense.
91 Hargreaves 1990, 301.
92 Officially the title is “l’Institut musulman de la mosquée de Paris.” The mosque is sometimes called “la grande mosquée.” Kepel 1987, 64–94.
95 Blatt 1995, 172.
96 Philippe 1999.
100 Details in Kepel 1997; see also Shadid and van Koningsveld, 2002, passim.
102 Kepel 1997, 190.
103 Haddam later quit his Algerian post, but it was too late for the CORIF. Kepel 1997, 177–9, 192–4; Tincq 1992.
104 Hussain 2003, 225–6.
107 “Foud Aloui démissionne du bureau exécutif du Conseil français du culte musulman” Le Monde, May 6, 2005. New elections held in June resulted in further fragmenting Aloui’s was preceded by other resignations, including by the representative of the Mosque of Lyon, who cited extensive disagreements. Ternisien 2004.
108 Huntington 1992; it should be added that there were also occasions characterized by mutually beneficial economic, scientific, and cultural relations. For example, Europe gained significantly in various disciplines from its encounters with Islam in Spain and Sicily.
110 While the original liberals, i.e., those who advocated a clear separation of church and state, thought Catholics could and should be educated out of their religious beliefs, they did not think that Catholics would or should go to some other continent.
111 Muslims, on the other hand, face occasional efforts by Christians to prevent the spread of Islam. In Spain, where some local governments tried to transfer control of abandoned mosques to the (new) Muslim communities, the Catholic Church protested. While the objection was (the unbelievable and offensive claim) that doing so would reduce Christians to the “backward” level of
Muslims, it was clear that the hierarchy feared competition from Islam. See Shadid and von Königsveld 2002, 34.

112 Perhaps symbolically representative of the problem: the various Muslim organizations could not even agree on the day for the beginning of Ramadhan in 2000 and 2004.

113 Schiffauer 1998, 155.

114 Warner 2000, passim.


116 We lack data on this question, although there is some evidence that those immigrants who remain adherents of the faith practice it more intensely in the (comparatively) inhospitable European environment. Schiffauer 1988, 146–158.

117 Muslim residents of the region attach a stronger subjective importance to religion than non-Muslims (religion being “important” or “very important”; 85.5 percent: 46.6 percent), attend religious services more frequently (monthly attendance 48.4 percent: 31.4 percent), and are more active in religious organizations (71.5 percent: 31.8 percent). Inglehart et al., World Values Survey, 1999–2001, http://search.icpsr.umich.edu/ICPSR/access/index.html # 3975; Anon., “The Number of Muslims is Rising Steadily in Germany”. http://www.pastornet.net.au/jmm/articles/488.htm, September 28, 2002.

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