

Explaining the Accommodation of Muslim Religious Practices in France, Britain,
and Germany

J. Christopher Soper and Joel Fetzer
Pepperdine University
Malibu, CA

Paper prepared for the Muslims in Western Europe Politics Conference,
Bloomington, Indiana, September 22-24, 2005.

There is a realization that Muslims are here, that we are citizens,
and that we have to be treated equally. We are not asking for
special treatment; what we want is fair treatment. You apply the
same rules to us as to anybody else.

Yaqub Zaki (2001), Executive Director of the Muslim Institute
Trust, London, England

Muslims have become a part of this society. More than three million
Muslims live in Germany permanently. They are not going to “go home.”
Their home is *here*.

Nadeem Elyas (2001), Chair of the Zentralrat der Muslime in
Deutschland, Cologne, Germany

Multicultural societies have only . . . functioned peacefully in authoritarian
states. To that extent it was a mistake for us to bring guestworkers from
foreign cultures into the country (Germany) at the beginning of the 1960’s.

Helmut Schmidt, former Chancellor of Germany, (Quoted in
Bernstein 2004).

Let no one be in any doubt – the rules of the game are changing. Coming
to Britain is not a right. And even when people come here, staying here
carries with it a duty.”

Tony Blair, British Prime Minister, 2005.

Do we want the river of Islam to enter the riverbed of [European]
secularism?

Jean-Pierre Raffarin, French Prime Minister, (quoted in Anderson
2004).

Introduction

State accommodation of Muslim religious practices is an increasingly important political issue across Western Europe. More than ten million Muslims currently live in Western Europe, which makes them the largest religious minority in the region. The number of Muslims in Europe has tripled in the last thirty years, Islam is the third largest religion overall in Europe, and in most West European countries it is growing much faster than the historically dominant Catholic and Protestant churches (Hollifield 1992; Masci 2004). In Germany, there are close to 2300 mosques or Islamic prayer rooms, most of which have been organized in the past decade but which are still insufficient to meet the religious needs of Muslims in the country (Spuler-Stegemann 2002:144). There are between two and three million practicing Muslims in France (Ministère de l'Intérieur et al. 2000:20-22), which, according to one estimate, is greater than the number of active Catholics (Caldwell 2000). In England, meanwhile, there are nearly as many practicing Muslims as active Anglicans (Brierley 1997:8:14, 10:14). Islam is a significant social and religious force in Western Europe.

The quotations above suggest two points that we intend to explore in this paper. The comments by Yakub Zaki and Nadeem Elyas imply that Muslims want the state to recognize their religious status and accommodate their religious practices justly and fairly. As we will demonstrate in the pages ahead, however, what states view as equitable treatment for Muslim citizens and immigrants, what they consider to be reasonable and just in terms of accommodating Muslim religious practices, and how governments pursue the twin policies of recognizing the religious rights of Muslims while insuring their effective incorporation into the values of the host country varies widely in Western Europe. Regardless of the fact that states face similar challenges, there is a notable cross-national divergence in policy related to how and whether

Western European states recognize and accommodate Muslim religious practices. The primary aim of this paper, therefore, is to explain how three European states, Britain, France, and Germany, have accommodated the religious needs of Muslims and to explore why there is such a difference in how they have done so.

The second set of quotations, on the other hand, suggest a secondary purpose of this paper: what impact, if any, have the deadly attacks by Muslim extremists in Madrid, London, and the Netherlands over the past 18 months had on the political efforts by Muslims to gain public recognition for their religious practices? Political debate in every country has centered on the issue of whether or not states have been too accommodating to the religious rights of Muslims. Some European political leaders have argued that secularism is, or ought to, the goal of public policy on matters of state accommodation of a group's religious practices. In asking for public recognition for their religious rights, therefore, Muslims pose a challenge to a secular mindset that wishes to divorce matters of "religion" from matters of "state." This ideology, which conveniently ignores the points of connection between church and state in most European states, including France, works to the disadvantage of Muslims who are looking to the state to recognize their religious rights. As we will argue toward the end of the paper, however, there remains a tension between Europe's increasingly secular political culture, on the one hand, with state policy that provides benefits to religious groups, on the other. We will pose four hypotheses on how this tension might play itself out on the issue of public recognition for the religious rights of Muslims.

Background

Muslims began immigrating to Europe in large numbers following the Second World War. They were part of a great wave of immigration that brought workers from the poorer

countries of the Mediterranean, Eastern Europe, and the former colonies to the industrialized states of the west that were enjoying an economic boom and trying to rebuild in the war's aftermath. Private employers and governments across Western Europe actively recruited foreign workers to provide the labor necessary to continue the economic expansion (Bade 1983:59-95; Frémeaux 1991:209-275).

In the face of the economic recession of the early 1970s, however, European states gradually closed their borders to low-skilled workers but allowed for the possibility of family reunion and political asylum. Host countries assumed that immigrants were temporary workers who would want to return to their country of origin, but many foreign-born residents had no interest in doing so. Ironically, this effort to restrict immigration had the unintended consequence of encouraging a "second wave" of immigration as family members and dependents of the original postwar economic migrants joined their families in Western Europe. This policy transformed the immigrant population from single migrants to families who wanted permanent settlement (Kettani 1996; Boyer 1998: 87-104; Nielsen 1999:25-35). Since many of these immigrants were Muslims, the Muslim population in Western Europe expanded rapidly.

Family settlement also changed the political calculus; immigrants became concerned not simply with their political and economic rights as workers, but also with their cultural and religious needs as permanent residents or citizens. Vexing policy questions emerged related to the religious rights of Muslim immigrants and citizens. Governments were suddenly confronted with such issues as how or whether to accommodate Muslim religious practices in state institutions such as schools, prisons, and hospitals, how or whether to develop their communities, whether to pass laws specifically designed to protect Muslims against religious discrimination,

and what efforts to take to stem native discrimination against them (Morsy 1992; Cesari 1997; Nielsen 1999:36-46; Özdemir 1999:244-259).

The result in every country in the region has been political controversy around issues of Muslim religious rights. Conflict in Britain has crystallized on the question of whether the state education system will fully finance private Islamic schools under the same conditions that apply to Christian and Jewish ones. Germany has contended with the question of how or whether to grant public corporation status (*Körperschaft des öffentlichen Rechts*) to Muslims as well as to Christians and Jews. Such a status would symbolize that Islam is a part of the country's religious landscape and allow Muslims' social welfare organizations to receive state funds. France annually struggles with the question of whether or not Islamic girls will be allowed to wear the *hijāb* in public schools. Each of the states has witnessed negotiations over such contested practices as regulations on building mosques and policy regarding the religious needs of Islamic workers.

While European states have faced a common set of challenges in accommodating the religious needs of Muslims, they have taken substantially different approaches in their accommodation of Muslims' religious practices. Britain led the way in tightening immigration controls in the early 1960s and limiting the citizenship opportunities for residents in its former colonies. In more recent years, Britain has refused to extend the law against racial discrimination in employment, housing, and education to include religious discrimination, a key concern for Muslims (Islamic Human Rights Commission 2000), and the Blair Labour Government has proposed a bill that would make it more difficult for immigrants and asylum seekers to gain citizenship. The quotation from Tony Blair at the opening of this paper suggests that the Labor Party Prime Minister is quite serious about such efforts.

At the same time, however, the state has been fairly open to accommodating the cultural and religious needs of Muslims (Spencer 1997). Britain embraced multiculturalism in state-supported schools in the 1970s; the curriculum in required religious-education classes includes an extensive treatment not only of Christianity, but also Judaism, Islam, and Sikhism (Keene and Keene 1997). When confronted with the issue of girls wearing the *hijāb* in state-run schools, British educational authorities quickly reached a compromise that allowed girls to wear the headcovering so long as it conformed with the color requirements of the school uniform (Liederman 2000). After many years of trying to win state aid for Islamic schools under the same conditions that governs aid to Christian schools within the state system, the government in 1998 gave approval to two independent Islamic schools (Howe 1998). A recent Green Paper on education encouraged an expansion of the faith-based school system to allow many more religious schools to receive state aid (Schools 2001).

France began to place greater restrictions on immigration in the 1970s; in the early 1980s the state initiated what turned out to be a wholly ineffectual policy of subsidizing migrants' return to their country of origin (Weil 1991). Most of these laws were repealed in the late 1990s. Laws were also passed that made it marginally more difficult for immigrants and the children of immigrants to gain citizenship, although most Muslims in France are citizens. In contrast to Britain, however, France has been far less accommodating to the religious needs of Muslims. France has rejected multiculturalism as an appropriate educational model in the state schools. Aside from such short lessons on the "Muslim world" as those in the *cinquième* History and Geography class (Marseille 1997:24-39), French secondary-school students learn nothing about Islam. Despite the popular impression that the *Conseil d'État*'s decision on the "Scarf Affair" resolved the issue (Gaspard and Khosrokhavar 1995; Cesari 1997:108-121; de Wenden and

Leveau 2001:78-79), French Muslim leaders estimate that “hundreds” of Muslim young women have been expelled from public schools for refusing to remove the *hijāb* (Kabtane 2001; Merroun 2001). These young women are then forced to study by correspondence, rely on volunteer Muslim tutors, or abandon their education altogether (Kada 2001). This strict version of *laïcité* is the dominant view in the most powerful teacher unions (Bergin 2001), which is significant because teachers are public officials who implement policy in the institution where church-state conflict around Islam most consistently arises: the schools. The state has been vigorously secular and opposed to the notion that public institutions should be made to assist the religious practices of Muslims (Peach and Glebe 1995).

A third country, Germany, represents something of a hybrid of these state responses. Only a very small percentage of Muslims in Germany are citizens, and until Schröder’s reforms of 1999, very few immigrants had the right to become German nationals. The state has also used various measures to encourage immigrants to return home, though these have largely been ineffectual. Finally, the German government has urged states in the European Union to tighten domestic immigration controls (John 2002). On the other hand, Germany has been more willing than France in accommodating the cultural and religious needs of its Muslim population, particularly at the *Land* level where most of these issues are resolved. The state has funded some Islamic social welfare and cultural organizations and established an Islamic school in Berlin (Doomernik 1995). In the state of North Rhine-Westphalia, moreover, education authorities have mandated the teaching of Islam in required religion courses in public schools, and have even gone so far as to write the required textbook. The clear intent of this decision is to encourage Muslims to learn more about their faith in the public schools, and to insure that the

version of Islam they are taught is fully compatible with liberal democracy (Gebauer 1986, 2001; Pfaff 2001).

There have been a number of fine studies of immigration into Western Europe (Castles and Miller 1993; Collinson 1993; Soysal 1994; Joppke 1999). These scholars have focused much needed attention on a phenomenon that has, in the words of one analyst, “been more transformative in [its] effect” in Western Europe than any other since 1945 (Messina 1996:134). These accounts, however, tend to focus on economic and citizenship issues and largely ignore questions of the religious identity and needs of Muslims. Social scientists, in short, have devoted very little attention to the religious aspect of Muslim policy demands, despite the fact that social and political tensions have mounted in recent years over a series of religious matters.

One reason for this silence on religious questions has been a perception among social scientists, oftentimes assumed rather than stated, that Western Europe is essentially secular and that issues of church and state are no longer relevant to public policy. According to this view, religious disputes were historically important in Europe, but those issues were largely settled, or at least minimized, in recent decades as the state became more secular and began to treat religious groups more or less equally. There is something to this thesis. Religion, which was at the center of political conflict in Europe a century ago, became less important politically in the middle decades of the twentieth century. However, the migration and settlement of large numbers of Muslims into Western Europe poses a new challenge to the existing church-state arrangements in countries and has resurrected somewhat dormant religious disputes.

Theories to be Tested

How can we explain the disparate political responses to the religious concerns of Muslims in Britain, France, and Germany. What have these states done in terms of public policy to accommodate the religious needs of their Muslim populations, and just as importantly, what explains the different state reactions? There is very little literature and no consensus on this central question, but there is a very rich literature on the policymaking process as it relates to immigration and citizenship policies in Western Europe which can be applied to our primary concern.

One common approach in the literature on immigration is to focus on the origin, ethnic composition, and organizational patterns of Muslim communities within a particular nation state (Penninx, et al 1993; Anwar 1995; Nielsen 1995; Kepel 1997). These accounts explain a state's policy on Muslim religious rights by analyzing domestic political considerations and the relative power of parties and movements that support Muslim religious rights against those that oppose them. Borrowing implicitly from resource mobilization theory, these descriptions accent the role of resources in mobilizing Muslim groups in Western Europe and stress the organizational structures which link individuals into a social movement.

A shared theme in these accounts is that Muslim groups have been politically ineffective because they lack the resources necessary to bargain effectively with the state. Wasif Shadid and Sjoerd van Koningsveld (1996:3) note, for example, that "Muslims in most Western European states have thus far been unsuccessful in creating representative organizations at national levels which can function as spokesman for the Muslim communities with the respective government." It is the absence of a representative organization, in their view, that explains why Western European states have failed to respond to the political demands of Muslim immigrants and

citizens. Ronald Kaye (1993) echoes this theme in his comparison of the politics of Muslim and Jewish groups in Great Britain. He notes that the Muslim community is larger than its Jewish counterpart, but that Muslim groups have not been as effective as Jewish ones at winning state concessions on the policy issue of the religious slaughter of animals. Kaye contends that Jewish groups have three significant political resources that are generally absent in the Muslim community: communal unity, coherent organizational resources, and the strategic placement of communal personnel in elite positions. It is the presence of these resources among Jewish groups, and the absence of them among their Muslim counterparts, which explain the different policy outcomes.

Several analysts also note that the existence of ethnic, religious, national, and linguistic divisions within the Muslim community act as a barrier to their political mobilization in Western European nations (Scantlebury 1995; Amiraux 1996; Vertovek and Peach 1997). In Britain, for example, Muslims are divided by nation of origin (India, Pakistan, Bangladesh, and various Arab countries), major branches of Islam (Sunnism and Shiism), and Islamic schools of thought (Deobandis, Barlewis, and Wahhabism). Muslim groups in Britain have organized dozens of political organizations, many of which claim to speak for the Muslim community, but given the internal divisions among Muslims, it has been difficult for any one of these groups to become an effective national group. The division of Muslim groups is so great that some scholars (Rath, et. al. 1999:67) point out that “the term Islamic community is inaccurate, and is better replaced by the plural form, religious communities.” Steven Vertovek and Ceri Peach (1997:30) correctly note that government authorities across Europe use this apparent disunity as a way of “refusing to respond to Muslims’ socio-political overtures.”

Muslims in Western Europe have for the most part failed to produce a native-born leadership, relying instead on religious and political leaders who are themselves immigrants or foreign born. An estimated 95 percent of all Imams in France, for example, come from abroad (Breton 1998). The same appears to be the case for religious leaders in other West European countries as well (Cherribi 2001). The absence of native-born clergy and group leadership almost certainly means that Muslim groups lack key resources, particularly information about how best to use the political system to their advantage.

Finally, Carolyn Warner (1999:5) argues that there might be something endemic in “the structure and ideology of Islam itself” which limits the mobilization of the Muslim community; there is no counterpart in Islam to a Christian church, no formally instituted body to supervise the religious and political agenda for Muslims. Warner claims that the absence of this religious hierarchy, particularly among Sunni Muslims, makes it difficult to organize the Muslim community as a whole. Individual mosques are important places of political mobilization for the Muslim immigrant community, she argues, but because they are locally controlled, oftentimes led by persons who are not themselves clerics, and frequently led by foreign-born imams the capacity of Muslims to form a well-organized national political movement is limited.

Much can be said for using the insights of resource mobilization theory to explain the politics of state accommodation for the religious rights of Muslims in West European nations. To the extent that there is disunity among Muslims (which is not surprising given their diverse origins), it does act as an obstacle to forming powerful organizations for collective political action. Our account of how European states have responded to the religious needs of Muslims will thus pay attention to internal dynamics within the Muslim community that have limited its capacity to form organizations and bargain effectively with the state.

On the other hand, a focus on resources alone is not enough to explain why states have responded as they have to the policy demands of Muslim immigrants. As was noted above, Britain has been more generous in accommodating Muslim religious demands than has France. According to resource mobilization theory, the reason for this difference would have to be that British Muslims have had group leaders with access to some set of significant political resources that French Muslims have lacked. A closer look at the politics of Muslim groups in the two countries, however, will reveal that this is not entirely the case. The British Muslim community is smaller than the French one, it is no better organized, it does not enjoy a unified cadre of leaders, and it has failed to establish a single national political organization to represent the interests of Muslim immigrants. While divided in some important respects, Muslims in France are organized into central political and religious organizations through the Paris Mosque; the Union of Muslim Organizations, and the National Federation of French Muslims. Yet it is Muslims in Britain, not France, who have won key concessions from the state. The reason, we will argue, has less to do with resources than with opportunities provided, or not provided, by the existing institutional structure of church and state in each state.

A second common approach in the literature on how European states have responded to the religious policy demands of Muslims focuses less on political resources and more on political institutions. Borrowing from political opportunity structure theory, this explanation highlights the direct and indirect ways that state officials and institutions influence the capacity of groups to engage in collective action, and examines the policy outcomes that follow from that political mobilization. The theory contends that key regime characteristics such as whether it is a unitary or federal polity, the type of electoral system, the separation of powers between the executive,

legislative, and judicial branches of government, and the position of key political elites all channel the politics of social groups (König 2000).

There are two ways in which state structures are seen as important in the politics of Muslim groups. First, inherited political institutions influence the political activism of groups in specific ways. Koopmans and Statham (2000:34) point out that a state's "institutional dimensions define the available channels of access" for groups like Muslims who want to challenge the polity. Jeroen Doomernik (1995:53) argues that "there is a direct connection between the institutionalization of the immigrant culture and what the host country's legal system allows." The political concentration of power in France, for example, means that Muslims must take their case to national political institutions if they are going to be effective. Claire Dwyer and Aristide Meyer (1995:51) similarly conclude that "the institutionalization of Islam in Europe appears to depend on the ways in which the existing legislation can be utilized by Muslim groups." In a related vein, Virginie Guiraudon (1998:295) notes that "the character of the institutions responsible for migrant policy is important -- whether they are centralized, parapublic, unitary, politically insulated, or under judicial scrutiny -- and whether consultation with interest groups is institutionalized."

The most important of those institutional variables for immigration politics include "the immigrants' legal situation; their social and political rights; and host society citizenship laws, naturalization procedures, and policies in such areas as education, housing, the labor market, and social assistance that shape conditions and immigrants' responses" (Ireland 1994:10). Jeannette Money (1999:104) focuses on the electoral process to explain divergent state policies on immigration. She contends that politicians make public policy, but that they face different incentives and electoral pressures when they do so. A geographic concentration of immigrants

necessarily invites local concerns about immigration policy, but “the dynamics of the political competition funneled through British political institutions catapulted immigration controls onto the national agenda much earlier there”.

Not only are institutions important in shaping how groups are politically active, they are also significant in determining whether groups achieve their goals. The reason for this is because the political structures of some nations are more amenable than are others to the policy changes sought by Muslim groups. Patrick Ireland (1994), for example, examines immigration politics in France and Switzerland with a particular focus on the impact of France’s unitary polity compared to the Swiss federal political system. He argues that the political centralization of power in the French state forces immigrants to aim for national legislation to win state concessions; the difficulty of that prospect, however, has meant that immigrants have had little policy impact. The Swiss federal system, by contrast, allows Muslim groups to mobilize at local levels where their power is concentrated; the result is that they have gradually been able to win more policy victories. Romain Garbaye (2000) highlights a similar dynamic in his comparison of the politics of ethnic conflict in Birmingham, England and Lille, France. Garbaye notes that Birmingham city officials worked closely with ethnic groups and took their demands seriously because Britain’s party system and parliamentary style of government empowers organized groups at the local level. The more centralized French party structure and presidential system, by contrast, allowed city leaders in Lille effectively to ignore ethnic groups in the city. The support or opposition of key political elites to Muslim demands can also affect a movement’s outcome.

To the extent that British Muslims have won policy concessions that their French or German counterparts have not, therefore, a political opportunity structure theory might well argue it is a result of the different political opportunities afforded Muslims in the two countries.

To take one example, because of very different citizenship laws in the two countries, a much higher percentage of British Muslims are citizens than are German Muslims. That they are more likely to be citizens means that British Muslims have myriad political opportunities for activism at their disposal. They can, for instance, participate through conventional political channels (voting and running for elective office), and existing parties have an incentive to make direct electoral appeals to them. German Muslims, by contrast, are less likely to be citizens, they cannot as effectively participate through conventional politics, parties have limited reasons to make appeals to them, and they even face the threat of deportation if they engage in unconventional political activism (Nielsen 1992; Peach and Glebe 1995; Guiraudon 1998). Given those political opportunities, therefore, British Muslims are likely to be more effective than their German counterparts.

One of the chief advantages of a political opportunity structure theory is that it is inherently comparative. The question that we posed at the beginning of this paper -- why states have responded differently to the religious needs of Muslims -- calls for such a cross-national approach. It is apparent that Muslim citizens and permanent residents in these three countries have nearly identical goals; they want to build mosques for public worship and religious schools to transmit the faith, and they want the state to make the concessions necessary so that they can practice their religion. What is different across Western European states is how states have responded to those religious concerns. There is much to be gained in using political opportunity structure theory to focus on the institutional reasons for those differences. What we will contend is that political opportunity structure theory is not wrong, but that it is limited in two key respects. First, the theory has not yet been applied to the question that we are principally interested in addressing in this paper; second, the theory has not fully recognized that religious

institutions are a part of the state structure and they have been central in shaping the politics of Muslim groups.

While there are some exceptions (Nielsen 1999; Rath 2001; Bader 2003), few analysts of Western European immigrants have focused much on the *religious* needs of the groups in question. Instead, state structural accounts have paid attention to immigrants' political rights, citizenship claims, labor demands, and civil rights and liberties. What we will argue, however, is that Muslim religious rights and needs are a key component – perhaps *the* key component – of their political demands. Muslims care a great deal about winning public recognition for their religion, having the state accommodate their religious practices, and being able to pass on their faith to their children in what they perceive to be a hostile social and political environment. That most accounts of Muslims in Western Europe have not systematically considered the politicization of these religious issues, therefore, marks a significant hole in the existing literature.

State structure theories have also failed to consider how the inherited institutional context of church and state in Western European nations has shaped the political resolution of Muslim religious demands. While some accounts briefly note the constitutional status of religion in particular states (Zolberg and Woon 1999), few authors expand on what role this institutional context assumes for Muslim politics, particularly for how religious issues are resolved. What we will argue, by contrast, is that the constitutional and legal status of religion in each nation, along with the historical context through which the institutions of church and state have related, are very significant in shaping how Britain, France, and Germany have accommodated the religious needs of Muslim groups. That history and those institutional structures have been key

components in explaining the disparate ways in which states have accommodated the religious needs of Muslims.

A third theoretical perspective pays more attention to ideas than to institutions, actors, or political resources. Picking up on much of the interest in recent political science literature on the connection between ideas and policies, this view contends that a nation's political ideology, particularly ideas about citizenship, nationality, and pluralism, shapes how the state resolves issues related to immigrant rights. Adrian Favell (1998) explains the divergent responses to ethnic and racial groups, particularly those of Muslim origin, in France and Britain in terms of each nation's public philosophy, or political theory. He argues that the guiding principle of political incorporation for immigrant groups in France is the republican tradition (Weil 1991) that favors a philosophy of integration rather than accommodation. The notion that France has a culturally particular idea of what it means to become a French citizen meant that French political elites and policy makers opposed separate Islamic institutions because this arrangement would violate the state's ideological commitment to integrating individual outsiders into the French political culture (Favell 1998:45). Instead of transforming immigrants into ideal citizens, the dominant ideas in Britain's political ideology place greater emphasis on managing relations among divergent populations, and allowing separate groups to retain their distinctive identities. Such an ideology has meant that British policy makers from both of the major parties have been open recognizing Islamic immigrants through public policy. This commitment explains why the state has supported multicultural education, race relations legislation, separate Islamic schools, and the development of independent Muslim communities. Political compromise is also consistent with Britain's pragmatic political tradition, which gives greater preference to what works than to abstract theorizing.

In a similar vein, Erick Bleich (1998) describes what he calls an “ideological prior” (a pre-existing set of philosophical commitments) that structures the debate among policy makers on immigrant rights within a particular country. Once these ideas about national identity are embedded within a political culture they prove resistant to change. In a comparison of citizenship laws in Germany and France, Rogers Brubaker (1992) argues that public policy is conditioned by an entrenched “cultural idiom” that effectively determines the policy outcome. David Blatt (1995) takes the argument a step further and contends that these “institutionalized norms” also shape the collective action of immigrant groups trying to change public policy. The inherited national ideas about political membership are so powerful that they even impact outsider groups who are trying to gain access to the political system.

A number of critics have pointed out that ideological accounts alone cannot easily explain the fact that nations’ citizenship laws have proven to be quite malleable in recent years. Christian Joppke (1998:284) notes that Germany is often characterized in the literature as a country which rejects immigration, despite the fact that “a series of Constitutional Court rules obliterated the official not-a-country-of-immigration policy”. He makes a compelling case that guest workers had won concessions from the state well before Schröder’s reforms of 1999 made it easier for them to gain German citizenship. Joppke’s evaluation does not, however, fundamentally reject the premise that ideas matter in the policy process. On the issue of family reunification policy, Joppke writes (1998:281) “it pitted a state that would rather not see it happen against the immigrant who only sought what liberal states cannot deny -- family unity”. European states have had a more welcoming family unification policy than their immigration rhetoric might envision, Joppke argues, because liberal values demanded it. In the German case,

then, it was competing ideas, specifically international norms and self-imposed moral obligations, that undermined the state's inherited not-a-country-of-immigration ideology.

The point of this discussion is that even the detractors of ideological theories understand that ideas can drive the policy process as much as institutions or resources. Analysts who have adapted the theory have made a compelling case that existing laws on citizenship, for example, follow logically from national ideas about who can and cannot be a member of the political community. Those who have countered the theory have themselves turned to different sets of ideas to explain why public policy changes over time. Ideas, in short, have had an impact on how receiving states have accommodated Muslims in the past several decades.

As with political opportunity structure theory, our claim is not so much that ideological approaches are wrong, but that they fail systematically to consider how ideas about the role of religion in public life play a dominant role in how states have accommodated Muslim religious practices. Analysts adopting an ideological theory have given much attention to national ideas about citizenship, political incorporation, and liberal political values in their accounts, but none of them has considered how a shared public philosophy on what role religion should play in public life has helped to shape the debate around Muslim religious rights. What this theory will demonstrate is that public ideas about church and state in Britain, France, and Germany have been critical factors for determining the states' policy response to the religious needs of Muslims.

Religious Institutions, Church-State History and Muslim Mobilization

The focus of our theory will be on the policy legacy left by a country's history of church-state relations. We hypothesize that public policy on state accommodation of Muslim religious practices in France, Britain, and Germany varies based in part on the inherited relationship

between church and state in each nation. We will demonstrate that this policy tradition helped to determine the types of religious demands that Muslims have proposed, the responses of various actors to those needs, and the public policy states eventually adopted in the area of Muslim religious rights. To the extent that policy responses in West European nations have differed, we will show that these differences resulted in large measure from dissimilar opportunities provided by the inherited church-state structures in particular nations (Fetzer and Soper 2005).

Few nations in the world have formalized as strict a separation of church and state as has France. French constitutional and legal sources firmly establish that no religion is to receive any legal establishment, that the state must be neutral in religious matters, and that churches are part of the private sector and may not receive any direct state funding. What is particularly unique about these legal provisions is that they were accompanied by a head-on attack on the Roman Catholic Church (Basdevant-Gaudemet 1996). This separation can be traced to the French Revolution, which pitted the state against the Catholic Church in a conflict that was inevitable given the claims on both sides for ultimate control over the social and political order. The Church became identified with the traditional order and a revival of the *Ancien Régime*; it opposed the secularization, democratization, and political liberalism of the French Revolution.

The state, on the other hand, became an implacable opponent of the Church and even tried to destroy it with a series of radical reforms in the early years of the Revolution, including changing the calendar to coincide with the start of the French Republic rather than the birth of Jesus and introducing a series of pseudo-religious ceremonies celebrating the ideals of the Revolution. This de-christianization campaign failed, but the revolutionaries did establish a regime of church-state separation that helped to fuel a lasting animosity between the partisans of the Church and of the Revolution (Frigulietti 1991; Gibson 1991; Meyer and Corvisier 1991).

The church regained some of its political power in the early part of the nineteenth century. The 1801 concordat signed between Napoleon and the Vatican re-established church control over its internal affairs, while the restoration of the Monarchy in 1814 strengthened the ties between church and state. Church-state conflict did not, however, dissipate. The Republican victory in the 1876 elections brought on a renewed wave of anticlerical attacks by the state that culminated in the 1905 law on the separation of church and state. The law abolished the 1801 concordat, deprived the church of its official status, and ended all forms of state aid to the Catholic Church (Kalyvas 1996:123). In the aftermath of these attacks, the role of the Church in the modern state became a primary line of cleavage between competing political parties, and a politics of antagonism between clerical and anticlerical forces infused French politics for most of the next century. Roman Catholics supported the conservative party, while minority faiths and non-practicing Catholics supported left-of-center parties. Politics became an arena of conflict where the parties aggressively opposed or defended separatism, or *laïcité*.

The institutional structure of religion and politics in England is far different from that in France. England has an established church, the Church of England, which enjoys certain benefits from the state. A strong rivalry between the Church of England and dissenting churches spilled over into party politics in the late nineteenth century. The Conservative Party defended the Established Church and attracted most Anglican votes, while the left-of-center Liberal party consolidated the support of religious minorities (Wald 1983). This competition was not, however, long-standing. By the turn of the century, the state had lifted most of the disabilities associated with religious nonconformity and had begun to accommodate minority religions in the key area of educational policy. While it took some time and political effort for dissenting churches to secure equal funding for their schools and win other concessions from the state, the

Church of England gradually came to see its role as working with Roman Catholics, Protestant nonconformists, and even Jews to promote consensual religious values. (Medhurst and Moyser 1988; McClean 1996; Monsma and Soper 1997).

At the start of the twentieth century there was, ironically, less political conflict around religion in England, which had an officially established church, than in France, where the state was ostensibly “neutral” toward religion. The reasons for this low level of conflict were many. First, the left-of-center parties, Liberal and then Labour, were not anticlerical; they both opposed the political privileges enjoyed by the Church of England, but they were not aggressively secular and did not advocate a separation of church and state. Second, there was no need for the formation of a party of religious defense because the state, far from being hostile to religion, retained a formal role for it in public life. As Michael Fogarty notes, British churches did not face a direct challenge "in the form of state supremacy over the churches . . . or of sectarian liberalism" (Fogarty 1992: 302). Religion remained a significant factor in party voting for the next several decades, but the political impact of religion waned.

The institutional structure of religion and politics in Germany is a hybrid of the French and English models. The Basic Law affirms that there is to be a separation of church and state; the state may not favor or establish any particular religion. On the other hand, the Constitution links the Church and State in certain endeavors. The state levies a Church Tax (8-9 percent of income tax), or *Kirchensteuer*, on members of the recognized Catholic and *Evangelische* churches and of Jewish congregations that provides for a majority of the churches' budget and helps finance many of their social, health, and cultural activities (Robbers 1996). The religious makeup and history of Germany go a long way toward explaining this unusual system.

Germany is a religiously mixed country and has been since the Peace of Westphalia affirmed the practice of *cuius regio, eius religio* (the religion of the ruler is the religion of the state). Given Germany's multitude of states, principalities, and free cities, this norm created areas almost totally committed to one Christian tradition or another. The unification of Germany under Bismarck in 1871 brought these disparate traditions together into one multiconfessional nation-state. The leadership of the new German state was conservative and overwhelmingly Protestant. The state allied itself with the Protestant *Evangelische* churches, and Bismarck launched his famous *Kulturkampf* to establish state supremacy over the Catholic Church, including control over primary education and suppression of the Church's political role. As in France, the political threat from the state led to the formation of a Catholic party of religious defense, the *Zentrum*, which lasted until the end of the Weimar Republic (Spotts 1973). The difference with France was that the political division in Germany was between Catholics and Protestants, rather than Catholics and secular liberals.

The end of the Second World War brought significant constitutional and political changes to the relations between church and state. First, Protestants and Catholics put aside their historical animosity and formed the inter-confessional Christian Democratic Union. The party committed itself to promoting non-sectarian Christian values, although it quickly developed into a catch-all conservative party advocating policies that benefited both churches. Second, the new West German constitution adopted the principle of church-state separation (first articulated during the Weimar Era), which means that the state may not favor any particular religion. On the other hand, the Basic Law formalized the Church Tax system (Kommers 1997).

Applying Church-State Theory to Public Policy

The problems of state accommodation of Muslim religious practices in France, Britain, and Germany vary based on how those states have resolved church-state issues in the past. The French church-state model of strict separation has restricted the ability of Muslim groups to take their case for public recognition of their religious rights directly to the state. In France's political ideology, *laïcité* is a very powerful political reality. Elite and popular support for this separation of church and state have made it difficult for Muslims in France who wish to argue that the state should accommodate their particular religious practices. France's secular republican creed, which shuns notions of special lobbies or communities, has made it particularly hard for Muslims to advocate for state accommodation. In general, the state has been vigorously secular and opposed to the notion that public institutions should be made to assist the religious practices of Muslims (Peach and Glebe 1995; Ramadan 1999).

For example, France has followed the logic of *laïcité* by rejecting multiculturalism as an appropriate educational model. Aside from such short lessons on the "Muslim world" as those in the *cinquième* History and Geography class (Marseille 1997:24-39), French secondary-school students learn nothing about Islam. In contrast to Germany's *Religionsunterricht*, instruction in one's particular religious tradition does not take place in French public schools. Moreover, in 1989 a public-school principal in the Parisian suburbs expelled three Muslim students for wearing the *hijāb* to school (Cesari 1997:108-121; de Wenden and Leveau 2001:78-79; Zouari 2002). The issue immediately polarized French society. The *Conseil d'État*'s subsequent decision on this "Scarf Affair" supposedly resolved the issue (Gaspard and Khosrokhavar 1995; see also Altschull 1995), yet French Muslim leaders estimate that "hundreds" of Muslim young women have been expelled from public schools for refusing to remove the *hijāb* (Kabane 2001;

Merroun 2001) . These young women are then forced to study by correspondence, rely on volunteer Muslim tutors, or abandon their education altogether (Kada 2001). This strict version of *laïcité* is the dominant view in the most powerful teacher unions (Bergin 2001), which is significant because teachers are public officials who implement policy in the institution where church-state conflict around Islam most consistently arises: the schools.

In such an ideological and institutional climate, it has been impossible for Muslims to put on the policy agenda such things as support for separate Islamic schools or state aid for Muslim social service organizations. Muslims have tried to press for state aid to private Islamic schools under the same conditions that govern aid to Roman Catholic schools. In the 2002 presidential election, for example, a coalition of French Muslim organizations presented a policy platform which included a proposal for state funding of private Islamic schools (Forum Citoyen Cultures Musulmanes 2002:26). Advocates of a strict version of *laïcité* dismissed this recommendation out of hand, however, and metropolitan France currently contains no publicly recognized Islamic schools.

This is not, however, the only reading of *laïcité*. A more benign interpretation would suggest that the state can make room for the public exercise of religion (Cesari 1997:108-121; Ramadan 1998). Perhaps the influence of the Front National explains why this version of *laïcité* has not prevailed, but this understanding of the tradition may make it easier for Muslims genuinely to integrate into French society. Muslims who want the state to recognize and accommodate their religious practices are doing so because they wish to integrate into French society. Muslims' opening over 1500 mosques in France (Ministère de l'Intérieur et al. 2000:29) and sending their children to public schools, far from being an indication of a desire for separation, indicate that Muslims want to build a life for themselves in France, not in their ethnic

homelands. Tariq Ramadan (1999:40-41), for example, notes “a new dynamic within the Muslim collective life in France” and a “new kind of commitment to help Muslims become more established in French society so as to be a real part of, a genuine component, of it, both in its social and political aspects.”

State accommodation of Muslim religious practices in Britain, by contrast, is shaped by a formal religious establishment. In some respects this establishment limits what Muslims can attain from the state. Clerics in the Church of England have guaranteed positions in the House of Lords; there are no formal provisions for membership from leaders of any other religious tradition. The state’s blasphemy law protects the Christian religion; attempts by Muslims to extend the law to cover Islam have failed (Commission for Racial Equality 1990). Nor do political leaders as a matter of course support extending the benefits of the religious establishment to minority faiths. The largest back-bench rebellion since the 2001 Labour Party victory came on Commons’ debate on a provision of the government’s Education Bill that called for extending public finance to more faith based schools, including minority faiths (James 2002). Finally, a 2001 government report in the aftermath of race riots in the city of Bradford raised some concerns about faith-based schools and concluded that many ethnic communities were not sufficiently integrated into British society (Cantle 2001). Muslims have countered that the best way to incorporate them is for the state to accommodate their religious needs despite Muslims’ not being part of the historical compromises that led to the inherited religious establishment (Islamic Human Rights Commission 2000).

For the most part, however, British policymakers have broadened the existing church-state model to incorporate Muslims and other minority faiths. When confronted with the issue of girls wearing the *hijāb* in state-run schools, British educational authorities quickly reached a

compromise that allowed girls to wear the headcovering so long as it conformed with the color requirements of the school uniform (Liederman 2000). After many years of trying to win state aid for Islamic schools under the same conditions that governs aid to Christian schools within the state system, the government in 1998 gave approval to two independent Islamic schools (Howe 1998). A recent Green Paper on education encouraged an expansion of the faith-based school system to allow many more religious schools to receive state aid (Department for Education and Employment 2001). The curriculum in required religious-education classes includes an extensive treatment of not only Christianity, but also Judaism, Islam, and Sikhism (Keene and Keene 1997). A number of scholars have highlighted that Muslims, who are divided in national politics, are often united at the local level (Lewis 1994; Vertovec 1997). This local solidarity has allowed Muslims successfully to negotiate with local government officials on education issues.

In all of this, Britain's church-state model has been an important institutional and ideological resource for Muslim activists and has opened up opportunities for Muslim political mobilization. The presence of an established church and its close link with politics and public policy in Britain does two things for Muslims. First, it encourages Muslims to press the state to accommodate their religious practices in the same way that the state accommodates other religions. In discussing the government's recent decision to finance Islamic schools, one Muslim leader noted to us that "the fact that there were no government funded Muslim schools was a ridiculous anomaly that had to go. The Anglicans had their schools, Roman Catholics had their schools, Jews had their schools. It was only right that we got our schools" (El-Essawy 2001). Muslim activists, in short, make explicit reference to the religious establishment model to legitimate a variety of public policy demands.

Just as importantly, the religious establishment enables Muslim leaders to make the argument for a public, political role for religion. Far from arguing for the disestablishment of the Church of England, Muslims are very conscious that the Church is a significant resource for them (Modood 1994). One Muslim leader put the matter succinctly: “There is much good in keeping the religious establishment intact. The establishment makes possible a recognition of a person’s right to put into action what he most sincerely believes in. It is a recognition of a person’s most fundamental right B the right to practice their religion. Finally, the establishment provides a public role for religion, which is a very positive thing” (Amer 2001). Muslims simply want the state to expand a church-state that already recognizes religious practices in a variety of ways.

The church-state policy legacy in Germany has a similar potential to be used by Muslims who wish to press for their policy demands. Germany has a long policy tradition of a close link between the state and the historically dominant Catholics and state-church Protestants. Churches that are recognized by the state as public corporations are eligible for a church tax (*Kirchensteuer*) that is collected by the government, and the state runs a significant portion of its social welfare services through agencies of these publicly recognized churches. As in Britain, the issue for Muslims in Germany is not whether the state should accommodate religion in public institutions; it already does. The question, instead, is whether the state is willing to expand its informal religious establishment and consider Islam as a public corporation despite the fact that Muslims were not party to the original compromise. To date, no *Land* government has recognized any Muslim group as a public corporation. Moreover, some state governments have forbidden Muslim teachers from wearing the *hijāb* on the ground that such Islamic dress from a public official violates state neutrality on religious matters (Staunton 1998; Ludin 2001). This

even though in such German states as Bavaria, most public school classrooms have crucifixes, and teachers from Catholic religious orders are not asked to remove their religious clothes. Nonetheless, the German church-state model, much like the British one, legitimates Muslim demands for public recognition of their religious practices. The state has, for example, funded some Islamic social welfare and cultural organizations as well as an Islamic school in Berlin (Doomernik 1995). In the state of North Rhine-Westphalia, moreover, education authorities have mandated the teaching of Islam in required religion courses in public schools, and have even gone so far as to write the required textbook. The clear intent of this decision is to encourage Muslims to learn more about their faith in the public schools, and to insure that the version of Islam they are taught is fully compatible with liberal democracy (Gebauer 1986, 2001; Pfaff 2001). This is not to suggest that Muslims have had an easy time gaining access to the system; it is simply to point out that the inherited patterns of church-state relations provide Muslim groups in Germany a model to which they can point in arguing for state support for their religious practices.

The public incorporation of Muslims in the three countries can be interpreted as a path dependent process shaped by the constitutional and legal patterns of church-state relations in each country as well the history of country-specific arrangements that have been worked out over time between religious groups and the state. The result has been policy divergence, as states have responded to Muslim demands in light of their unique legal, historical, and constitutional structures. This is not to suggest that these patterns have preordained the outcome of these disputes; the persistent political controversy in Britain, France, and Germany around the public incorporation of Islam suggests that there is no inevitable outcome on the politics of religious

recognition. However, inherited structures and practices have shaped the contours of the political debate in meaningful and important ways.

There are, however, countervailing pressures that might lead to more policy convergence over time on these issues. One of those tendencies has been the impact of the institutionalization of human rights, represented by such treaties as the *European Convention on the Protection of Human Rights and Basic Freedoms* (1953), the *Universal Declaration of Human Rights* (1948), the *Treaty of Maastricht* (1992), the *Treaty of Amsterdam* (1997), and the *Charter on Basic Rights* (2001), all of which have provisions that have had the effect of de-coupling individual rights from formal state membership and putting some limits on national political sovereignty. European states might be under increased pressure to adopt anti-discrimination legislation and formally to recognize religious rights, which might produce a harmonization of state policy on Muslim religious rights (Koenig 2005).

A second tendency toward policy convergence is that European states share similar concerns about immigration, security, and the successful integration of Muslims into the values of the host society. As disparate as the British, French, and German policy responses to Muslims have been in the past, the recent terrorist attacks by Muslim extremists in Madrid, Amsterdam, and London have created a perception at both the elite and popular levels that some synchronization of policy is necessary in order to respond effectively to what are shared social and political problems (Fleishman, Frammolino, and Rotella 2005).

We still maintain, nonetheless, that church-state traditions in these countries will continue to shape the context through which state accommodation of Muslim religious practices plays itself out. How, and under what conditions, states accommodate Muslim religious needs will depend in large measure on existing relations between political and religious institutions, which

are themselves a product of decades, sometimes centuries, of legal and constitutional arrangements. Church-state patterns within each state will continue to shape the political opportunity structure for Muslim groups, as well as affecting the ideological assumptions made by political elites and the public about what is politically feasible and necessary.

Conclusion: Secularism and the Future of Muslims in Western Europe.

What might we expect the politics of state accommodation of Muslim religious practices to look like in the years ahead? An important factor that we have not discussed at length but that promises to shape how states respond to Muslims in the years ahead is European secularism. The chief social characteristics of this secularization are declining church membership and the retrenchment of religious belief into the private sphere (Davie 2000). In Germany, for example, the proportion of the population that has no religious affiliation is almost as large as the proportion of Protestants and Catholics. Germans are not highly religious – less than half of Germans consider themselves religious and only about 40% think that religion is an important feature of their nationality. Muslims in Germany, by contrast, tend to be more religious and attach a greater importance to religious identity than other Germans (See Table 1). Germany is not alone in experiencing this kind of secularism; it is widespread throughout Western Europe.

TABLE 1: Faith and Religion in Germany by Religious Group

Question	All non-Muslims	Muslims	Protestants	Catholics
Importance of religion (very, rather).	28.0	69.6	36.4	51.8
Consider self a religious person	45.4	91.3	67.8	75.5
Attend religious service at least once per month	24.0	43.5	31.2	50.9
Believe in God	53.5	95.5	80.7	89.9
Believe in Heaven	24.1	65.0	34.2	44.8

Source: World Values Study 99-01.

Scenario #1: Inter-religious conflict

One possible consequence of this increased secularism is that the historically dominant Christian churches will try to re-evangelize Europe, maintain their institutional prerogatives, and use their political power to restrict future opportunities for Muslims and other religious minorities. While the churches in Britain and Germany have historically provided institutional support for Muslims, it is also true, as a number of scholars have noted, that churches have often sought to limit religious competition by regulating access for religious newcomers (Finke and Stark 1992; Gill 1998). Thus far, Muslims have not posed much of a threat to Christians in Europe, but as the number of active Christians diminishes and the number of Muslims increases, the churches might begin to perceive Muslims as a challenge to their advantaged position. If they do, the churches may seek to use the state to regulate a suddenly ascendant Islam and to deny to Muslims benefits provided by the state to the “recognized” churches. There is some evidence to suggest that European Christians will do just that. On the issue of Turkey’s ascension to the European Union, for example, Pope Benedict XVI said in August of 2004 that Turkey should seek partners elsewhere because its Muslim faith was in “permanent contrast” with Europe’s Christian legacy. The Pope has also made the re-evangelization of Europe a central focus for his papacy. The Archbishop of Paris, Cardinal Jean-Marie Lustiger, has spoken of the risks inherent of Islam “becoming a state religion” by the backdoor in France (Economist 2005). In short, the churches might respond to the twin challenges of secularism and the rising number of Muslims by trying to reassert Europe’s Christian character and by opposing Muslim efforts to gain public recognition for their religious practices.

The electoral success of nativist political parties in France, the Netherlands, Austria, and even Britain suggests that there is a political market for an approach that marginalizes and

scapegoats Muslims. The terrorist attacks over the past 18 months have clearly tested the regions faith in multiculturalism. Even if nativist parties fail to gain political power, mainstream parties throughout the region will almost certainly be under some electoral pressure to adopt policies that limit state efforts to recognize Muslim religious rights. This political backlash might also include state efforts positively to affirm the “Christian” heritage and practice of the region, thereby inducing an inter-religious conflict that spills over into party politics.

Scenerio #2: Public Policy Secularism

The risk for Christian churches in denying Muslims state benefits, however, should be fairly obvious: why should the state protect the political privileges granted to Christian churches when so few people are actively religious? If the churches resist Muslim claims for public support for their religious practices, in short, does that necessarily undermine their claim that the state should recognize the Christian religion? What seems just as plausible an outcome in the future is that political elites will argue that secularism warrants the state removing itself from the business of recognizing any churches and moving away from a system that has historically granted religious institutions important power in such policy areas as education and social welfare provision. As fewer people attend church, and as the secular tide moves religion and the state further apart, it is possible that the state will remove itself from the business of recognizing churches and granting to them any statutory advantages (Iverson 2004). Ironically, the immigration of Muslims into Europe might well hasten this secular trend, as political elites conclude that the increased political disputes around religion are simply not worth the cost of maintaining the inherited church-state links. Rather than extending state benefits to include Muslims and other religious newcomers, in short, it is possible that the future will witness increased political efforts to secularize state policy on accommodating religion.

Scenario #3: Pan Religious Mobilization

If the quotation by French Prime Minister Jean-Pierre Raffarin cited at the beginning of this paper is indicative of the views of secularly minded rulers in Europe, Christians would probably do well to conclude that secularism is a greater threat to their religious identity than is Islam. After all, if the riverbed of Europe is secularism, as Raffarin suggests, it presumably leaves little room for a Muslim or Christian foundation. A third possible future for the politics of religious accommodation is that European Christians, Muslims, and Jews will form a most unusual political coalition to protect the very idea that religion rightly has a public political role to play. There is some indication that Christian and Muslim leaders are beginning to recognize their shared political interests. Tariq Modood, a British Muslim, notes that “the real division of opinion is not between a conservative element in the Church of England versus the rest of the country, but between those who think religion has a place in secular public culture and those who think not” (Modood 1994:72). Leslie Newbigin, a British Christian, asserts “in our present situation in Britain where Christians and Muslims share a common position as minority faiths in a society dominated by the naturalistic ideology, we share a common duty to challenge this ideology” (Newbigin et. al. 1998:22).

It is also important to note that the Christian churches have, on the whole, been an institutional ally for Muslims as they have sought recognition from the state. Some of that support was principled; Christian leaders have recognized the legitimacy of the claims made by Muslims and for the most part have sprung to their defense. Some of the aid from Christian leaders has been strategic; they have implicitly recognized that to deny public benefits to Muslims is to open the question of state aid to any church.

The fact that European Muslims are more socially conservative than their non-Muslim counterparts further suggests reasons for a possible coalition with orthodox Christian groups. In Germany, for example, Muslim attitudes on divorce, abortion, and homosexuality are more uncompromising than Germans (see Table 2). That Muslims seem to embrace a set of values closer to the traditional values and family agenda of the churches, particularly the Roman Catholic Church, we might expect to see cooperation between Muslims and Catholics in promoting conservative social legislation. In theory, this cooperation could even spill over into party politics, as orthodox religionists look for a party that would promote their shared interests. A It would be supremely ironic, or possibly the work of a benign deity with a supremely active sense of humor if, after centuries of dispute, it was secularism, rather than religion, that drew Christians and Muslims together in a joint effort to retain a public role for religion.

TABLE 2: Social Attitudes in Germany by Religious Group

Question	All Non-Muslims	Muslims	Protestants	Catholics
Divorce is never justifiable	12.3	47.6	15.1	17.6
Abortion is never justifiable	22.7	68.2	23.5	38.0
Homosexuality is never justifiable	21.6	65.0	23.9	20.0

Source: World Values Study 99-01.

Scenario #4: Gradual Muslim Integration

A final scenario that we want to highlight is that the Muslim experience in Europe will mirror that of other religious minorities in the region. More than three centuries ago, in his *A Letter Concerning Toleration*, John Locke noted:

It is ridiculous for any person to profess himself to be a Mahometan only in his religion, but in everything else a faithful subject to a Christian magistrate, whilst at the same time he acknowledges himself bound to yield blind obedience to the Mufti of Constantinople, who himself is entirely obedient to the Ottoman Emperor and frames the feigned oracles of that religion according to his pleasure.

Most commentators believe that Locke was actually talking about Roman Catholics, rather than Muslims, but the point remains the same: concern about the ability of religious newcomers to integrate into the dominant values of a society is hardly new. Today's Muslims are yesterdays Jews who were yesteryears Roman Catholics; there no reason to conclude that Muslims cannot eventually integrate into the values of the West, much as religious minorities did before them. There is some evidence to suggest that Muslims are more engaged in integrative political activities than ever before. As Ron Geaves (2005) points out, Muslims were very active in the Stop the War Coalition, joining forces with religious and nonreligious groups to oppose British involvement in the War in Iraq. What could be more affirming about the successful integration of British Muslims than their engaging in the time honored tradition of peaceful demonstration, particularly across religious, racial, and class lines? To be sure, the violence of Muslim extremists over the past 18 months raises legitimate questions about their eventual integration into the values of the West, but of equal concern has been the violence directed against innocent

Muslims throughout Europe (Allen and Nielsen 2002). Integration, in short, needs to be a two-way street.

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