CONTEMPORARY POLICIES REGARDING THE ACCOMMODATION OF TRANSNATIONAL ISLAM IN WESTERN EUROPE: THE SUCCESS AND FAILURE OF MUSLIM REPRESENTATIVE ORGANIZATIONS

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This article deals with the problem of state involvement in the creation of representative umbrella structures for Muslims in Western Europe from the 1970s onwards. Based on a wide range of previous studies, official documents and media reports, it offers a general overview of the current state of this issue in sixteen European countries with different models of church-state relations and different sizes of Muslim populations. On the most basic level, the article demonstrates that the choice of government policies in this area has been determined by a combination of objective and subjective factors predominant in each specific context, rather than by some overarching European paradigm rooted in the principles of secularity. In this regard, it is highly indicative that common social, religious or cultural backgrounds of certain societies did not automatically translate into the deployment of similar strategies of accommodation of Islam through the formation of single representative entities. By contrast, countries with different state-church arrangements but similar political motivations often adopt comparable approaches to dealing with this problem. In order to illustrate such effects, three major clusters of cases have been singled out based on the level of state involvement and the level of success of the umbrella-type entities in

executing their designated tasks of mediation between Muslims communities and European governments. Overall, the argument of this paper is that, despite some initial optimistic assessments of these processes, from the perspective of the mid-2020s the policies of political interference with the "natural" dynamics of the institutionalization of Muslim minorities can hardly be viewed as an effective means of managing the inherently transnational (or "transplanted") nature of European Islam as a conglomerate of various, often conflicting, theological, cultural and ideological agendas.

Keywords: Islam, Muslims, Western Europe, institutionalization, state

Introduction. In the past four decades, the status of Islam has become one of the most topical and debated areas of research on the current dynamics and future trajectories of religious change in Western Europe[1]. The en-mass arrival of invited Muslim workers in the 1960s and 1970s, episodic waves of refugees from the Balkans, Africa and the Middle East, compounded by the concomitant natural demographic factors, have swiftly created in this region significant Muslim minorities which in some countries already constitute up to 8 % of the general population [Scharbrodt 2021, *149*][2]. In this regard, Islam has long become Europe's second largest religion in terms of the number of followers [Hunter, Serfaty 2002, *xiii*]. This state of affairs requires special attention not just from the media and political authorities but also from analysts and researchers of various academic fields.

In its most urgent manifestations, the perpetual topicality of Islam-related issues is determined by the emergence of international Islamism as a source of existential security threats and the corresponding

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[1] Although definitions of "Western Europe" may vary significantly, for the purposes of this article, this concept is understood in a wide socio-political sense as encompassing an array of highly advanced democratic European societies, including the regions which are often designated in more detailed geoscheme classifications as "Southern Europe" and "Northern Europe".

[2] For an overview and a periodization of Muslim migration to Western Europe since the middle of the 20th century, see: [Scharbrodt 2021, *152–156*]. For a perspective on the Muslim population in Europe according social survey data, see, e.g.: Hackett C. (2017), "5 facts about the Muslim population in Europe", in *Pew Research Center*, available at: https://www.pewresearch.org/short-reads/2017/11/29/5-facts-about-the-muslim-population-in-europe/ (accessed May 5, 2024).

need of preventing terrorist attacks and radicalization of ordinary believers by various local and transnational extremist movements that promote their own versions of "political Islam". However, in a broader perspective, European governments have also had to face the fundamental problem of social integration of migrants from Muslim countries against the backdrop of the growing multiculturalism of European societies and various external challenges to their historical and cultural ethos.

Even a cursory analysis of the first few volumes of the *Yearbook of Muslims in Europe* series demonstrates that the process of accommodation and integration of Muslims has a number of problematic points that continue to cause tensions between Muslim believers and their predominant social environment. For one thing, although far from all "ethnic" Muslims are consistently practicing their faith, since the 1970s Muslim communities have struggled to meet a steadily growing demand for full-fledged mosques in lieu of temporary prayer spaces. However, this demand has typically raised a number of reservations from political actors and the general public. For some, mosques, in one way or another, signified changing what was perceived as traditional cultural landscapes of European cities in the direction of "Islamization". This issue, for example, came to the fore in 2009 in Switzerland with the referendum which approved the ban on minarets [Pacillo 2012]. No less importantly, another dilemma concerned the issues of financing expensive mosque projects because securing necessary funds from different sources could also result in obtaining hidden leverages over European Muslims by foreign centers, i.e. state or non-state transnational actors with specific ideological agendas (such as the Saudi-controlled "Muslim World League", the Turkish government department for religious affairs *Diyanet* or the global Islamist movement "The Muslim Brothers"). In order to prevent this, European governments either had to allocate money for such projects from their own budgets (a move that could violate the basic principles of secularity and also exacerbate public concerns about the growing "Islamization" of European spaces), or needed to obligate Muslim communities to rely mainly on local resources (which were often too scarce).

Among other problematic issues of the accommodation of Islamic religious customs in European contexts one can also mention the need

to find special land plots for Muslim cemeteries in a situation of the general scarcity of burial spaces in modern European cities. This problem is sometimes complicated by the fact that, in contrast to the practice of temporary burial of remains in the ground for several decades with their subsequent exhumation and relocation (which, for example, is common in Italy), Muslim cemeteries needed to allocate plots for permanent burial. Another example of a problematic issue is Muslim methods of slaughtering livestock in accordance with the "halal" standards which came under scrutiny against the backdrop of the growing movement for animal welfare protection[3]. In this respect, the ongoing debates concern the permissibility of stunning animals before slaughtering (as required by many European regulations) vis-à-vis the prescriptions of the *sharia* norms. Last but not least, in the context of the overarching struggle for women's rights, on the one hand, and for the secularity of public spaces, on the other, the subject of Muslim female garments has been the most discussed and significant problem. Initially, this issue concerned the right of wearing headscarves (*hijabs*) in state-funded institutions, for example, by female students in schools or employees in official organizations[4]. At the current stage, however, many controversies are caused by the planned or already implemented regulations presupposing a complete ban on *burqa* and *niqab*, i.e. the forms of Muslim clothing that completely or partially cover women's faces.

The actual policy approaches to addressing these and other issues of integration of Muslim believers have directly depended on a multitude of local cultural and political factors. On the most basic level, it is a question of the particularities of legislation on religion and traditional models of state-church relations in each individual country which determine those legal frameworks that allow the authorities to rely on existing precedents to meet the needs of Muslims or, by contrast, to force them to adjust to the dominant social environments. On the other hand, though, European political elites swiftly had to come to terms with a fundamental paradox of Islam: the illusion of its monolithic unity, which is produced by the seeming uniformity of the basic monotheistic doctrine, in fact conceals an extraordinary cultural, theological and ideological diversity. Hence, in the absence of the

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[3] See on this, e.g.: [Bergeaud-Blackler 2007].
[4] See on this, e.g.: [Fetzer, Soper 2005; Davidson 2012, *206–208*].

concept of an Islamic sacred institution (i.e. "church"), as well as given the absence of local historically determined Muslim religio-political traditions, the focal points for the organizational attraction of Muslim migrants in many Western European contexts became ethno-cultural backgrounds (commonality of national language and culture), political convictions (loyalty to a certain country or regime), theological orientations (Sufism or Salafism) or religiously motivated activism (Islamism). Accordingly, in a situation of the inherent pluralism of Islam, government actors had to face a dilemma: either to search for a basic "common denominator" for the majority of Muslim groups, or to try and meet the needs of each of these groups separately.

This article focuses on one of the consequences of the aforementioned dilemma. In particular, it deals with the question of state involvement in the creation of representative umbrella structures for Muslims in Western European societies with significant Muslim minorities. Of special importance here is an analysis of how the governing authorities used such structures as a means of dealing with the inherent transnational ("transplanted") nature of European Islam as a conglomerate of cohorts with various, often conflicting, theological, cultural and ideological orientations.

Needless to say, the problem under analysis has not gone unnoticed by scholars of Islam in Europe. In this respect, researchers have offered both overviews of the institutionalization processes in the context of the general dynamics of European Islam and detailed inquiries into individual country cases[5]. However, the seminal volume that summarized the outcomes of government intervention in the emergence of Muslim "interlocutors" in the context of state-church relations between the 1970s and the 2010s was Jonathan Laurence's *The Emancipation of Europe's Muslims: The State's Role in Minority Integration* [Laurence 2012]. At the time of writing, Laurence gave these developments – which he saw as establishment of a neo-corporatist arrangement with Islam [Laurence 2009] – a positive and optimistic assessment, labeling the creation of Muslim representative structures as a "breakthrough" comparable, among other things, to

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[5] See on this, e.g.: [Shadid, van Koningsveld 1995, *51–59*; Hussain 2003; Maréchal 2003; Cesari 2004, *65–75*; Ferrari 2005; Godard 2007; Silvestri 2010; Loobuyck, Debeer, Meier 2013; Ferrari, Bottoni 2014; Ciciora 2018; Scharbrodt 2021, *158–160*].

the introduction of a single European currency [Laurence 2012, *14*]. In his view, such institutions signified the irreversible inclusion of Islam in the European political landscape, as well as the affirmation of the authority and dominance of the European nation states within their borders [Laurence 2012, *14*, *19*].

Be that as it may, a number of shifts in the situation since the early 2010s have provided grounds for reconsidering Laurence's conclusions in favor of a more critical perspective on the actual role and efficiency of Muslim interlocutors in the accommodation of transnational Islam in Western Europe. For its part, this article offers a tentative comparative overview of the current status of this problem in sixteen European countries with different regimes of secularity which range from the strict *laïcité* model of France to the Scandinavian models which combine the existence of privileged "state" or "folk" churches with allocation of permanent government funding for large religious minorities. In this regard, the article aims to demonstrate a peculiar variability of patterns of accommodation of Islam in polities with similar legislative or religious backgrounds, and *vice versa* – similarities of the Islam policy strategies in countries with patently different religio-political arrangements. In the big picture, the article's underlying arguments are that strong political involvement has not proven itself as an efficient way of forging unity of Muslims because in practice it requires (or otherwise results in) a continuous oversight by the governments over their Muslim "interlocutors" – an arrangement that directly affects the perceived independence of such representative entities and their authoritativeness among ordinary believers.

It is worth mentioning that due to the fluidity and complexity of the situation in each individual country, any classification of European policies towards Muslims should be by default regarded as relative[6]. However, for the purposes of this overview, three clusters of cases can be singled out based on two basic variables. The first variable

[6] See in this regard a typology of Muslim representative organizations in Europe proposed by Ciciora [Ciciora 2018]. On the one hand, Ciciora's article does offer a number of compelling hypotheses and insightful observations which can be used as departure points for further analysis on the subject. On the other hand, though, her placement of some Muslim organizations under certain categories seems to be highly problematic, thus casting doubt on the validity of the whole endeavor.

concerns the role of politicians or state actors in the emergence of representative Muslim structures. This role could manifest itself merely in the form of general declarations about the inevitability of such entities for the *normal* accommodation of Islam in a European society or, more straightforwardly, through direct involvement of public officials in their creation. The second variable takes account of the successful or unsuccessful outcomes of the aforementioned processes, primarily the institutional survival of representative organizations in the long run as an indication of their ability to manage internal and external challenges independently as well as maintaining a stable, friendly relationship with the authorities[7].

Cluster 1: Unsuccessful cases of state intervention. This cluster includes those countries where political actors in one way or another encouraged Muslims to unite, played a notable part in the process, or *post factum* legitimized previously established representative organizations as privileged "interlocutors"; however, eventually these structures failed or came into conflict with the state. As has been shown in detail elsewhere [Shestopalets 2024], the cases of Belgium and France can be considered paradigmatic examples of this group. In both countries, high ranking public officials invested significant financial resources as well as their capital of political authority in order to form institutional structures that could have a legitimate claim to representing the interests of the majority of local Muslims. The outcomes of these efforts were also fairly similar, i.e. an almost simultaneous delegitimization of their Muslim interlocutors by the Belgian and French governments in the early 2020s.

In the case of **Belgium**, Islam was declared an officially "recognized" religion back in 1974, which, according to the Belgian legislation on religion, gave Muslim communities the right to receive permanent state funding for their basic expenses, such as paying the clergy's salaries and pensions [Torfs 2000, *73–75*; Hallet 2004, *40–43*]. However, from the government's point of view, a proper allocation of such funds would not be possible in practice without the mediation of a single representative structure which would also be responsible for the

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[7] An in-depth evaluation of the actual *effectiveness* of such organizations, i.e. their practical contributions to the improvement of Muslims' accommodation in society and to upholding their rights, merits a separate examination and thus cannot be effectively dealt with in this overview.

registration of individual communities and the distribution of money among them [Bastenier, Dassetto 1985, *18*]. After a long and turbulent period of negotiations between the key stakeholders throughout the first half of the 1990s, in 1998 the Belgian government finally managed to arrange general elections in the local Muslim communities which resulted in the creation of the "Administration of the Muslims of Belgium" (Exécutif des Musulmans de Belgique, henceforth – the EMB or the Administration) [Renaerts, Manço 2000]. However, despite some progress in the practical implementation of the 1974 Act on the recognition of Islam, this organization proved to be internally unstable and thus unable to truly unite Muslim groups with different ideological orientations [Sägesser, Torrekens 2008; Torrekens 2015; Sägesser 2020]. As a result, in the early 2020s, the Minister of Justice in the Belgian government, Vincent van Quickenborn, decided to put heavy pressure on the *EMB* in order to motivate it to reform and radically increase its efficiency [Husson 2021; Husson 2024]. After several months of latent conflict, in September 2022, the minister finally stripped the EMB of its interlocutor status and, despite the fierce opposition of the Administration, launched the process of its liquidation as a legal entity, which was completed in 2024[8].

Despite the glaring differences in the French and Belgian legislation on religion (such as the lack of allocated funding for confessions in the framework of French *laïcité* after the adoption of the 1905 Law), since the late 1980s **France** has shown very similar patterns of state intervention in the institutionalization of Islam. This strategy was primarily motivated by the necessity of struggle against destructive foreign influences. After the demise of several "experimental" representative structures for Muslims, in 1999 – i.e. shortly after the successful founding of the EMB – the French government launched its own process of "consultation" between Muslim organizations within the "Istishara" platform [Basdevant-Gaudemet, Frégosi 2004; Laurence 2005; Laurence, Vaisse 2006][9]. It would not be

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[8] "Le Collège de l'Exécutif des Musulmans dissout par le Tribunal de l'entreprise" (2024), *BX1*, available at: https://bx1.be/categories/news/le-college-de-lexecutif-des-musulmans-dissout-par-le-tribunal-de-lentreprise/ (accessed May 5, 2024).

[9] For a detailed analysis of these issues in Ukrainian, see, e.g.: [Sypko 2013; 2017; Shestopalets 2024].

an exaggeration to argue that the success of this project – especially in its final stages – was entirely due to the intervention of interested political actors, in particular the Minister of the Interior Nicolas Sarkozy [Billon 2005]. In the spring of 2003, elections were held in French mosques, as a result of which the "French Council of the Muslim Religion" (*Conseil français du culte musulman*, henceforth – CFCM) was created. However, as in the Belgian scenario, in the following two decades bitter internal disputes and power struggles between competing Muslim centers of influence repeatedly paralyzed the work of the CFCM, calling into question the expediency of its very existence. Accordingly, in December 2021, the French Minister of the Interior de facto revoked the status of "interlocutor" from CFCM[10].

It is worth noting that, despite the obvious deficiencies of the state intervention model, the governments in both countries have made attempts to introduce a new and improved format of the joint representation of Muslims. In particular, in January–February 2022, the French authorities apparently decided to follow suit of Germany (see below) by creating the "Islam Forum of France" (*Forum de l'islam de France*, FORIF) [Frégosi 2024; Zwilling 2024]. In essence, the FORIF was an annual gathering of Muslim representatives who were vetted and invited by the Ministry of the Interior. Between such gatherings, discussions of key issues of Muslim life in France continued in special working groups. For their part, in June 2023 Belgian officials facilitated the creation of the "Council of Muslims of Belgium" (*Conseil musulman de Belgique*, CMB) as an interim body that was supposed to take over the functions of the EMB until another fully-fledged representative structure was created on a new basis[11]. However, given the negative inertia of the initial state policies towards Muslims both in France and in Belgium, at the time of this writing, the prospects of success for these newly created alternatives remain uncertain.

[10] " 'Le CFCM est mort, il n'est plus l'interlocuteur des pouvoirs publics' declare le ministre français de l'intérieur, Gérald Darmanin, 13 décembre 2021" (2021), *Barlamane*, available at: https://www.barlamane.com/fr/le-cfcm-est-mort-il-nest-plus-linterlocuteur-des-pouvoirs-publics-declare-le-ministre-francais-de-linterieur-gerald-darmanin/ (accessed August 5, 2024).

[11] Taylor L. (2023), "Muslim Council of Belgium replaces scandal-hit executive body", *The Brussels Times*, available at: https://www.brusselstimes.com/551341/muslim-council-of-belgium-replaces-scandal-hit-representative-body (accessed May 5, 2024).

Compared to France and Belgium, where state intervention in Muslim affairs has repeatedly sparked debates about violations of fundamental principles of constitutional secularity, the cases of other countries in this cluster are much less pronounced. Yet they are still quite illustrative of the basic pattern. For example, as an umbrella structure, the "Muslim Council of Britain" (MCB) was established in **the United Kingdom** in 1997 in response to an appeal from the Home Secretary Michael Howard but without any actual financial or organizational involvement of the government [Maréchal 2003; Birt 2005; Pędziwiatr 2007]. On the one hand, in the decade following its emergence the MCB was indeed politically legitimated as a public partner of the British establishment in dealing with various problematic issues of the accommodation of Muslims. On the other hand, radical differences in the approaches to assessing British foreign policy in Muslim countries (and, especially, the Palestinian problem) gradually led to a complete collapse of the MCB's relations with the state. Already in the late 2000s a prohibition was issued for public officials of any level on making contacts or cooperation with this largest Muslim organization in the UK[12]. In the late 2010s and early 2020s, the precarious position of the MCB was yet again worsened by an acute conflict with the Conservative Party, whose members were repeatedly accused by MCB representatives of promoting Islamophobic attitudes and discriminatory policies against Muslim minorities[13]. Hence, it is not surprising that the ban on contacts with the organization was yet again reaffirmed by the government in 2022[14]. Instead, the authorities have opted for a strategy of diversification of contacts with Muslim organizations, giving preference to ostensibly moderate groups [Scharbrodt 2021, *159*].

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[12] Dodd V. (2009), "Government Suspends links with Muslim Council of Britain over Gaza", *The Guardian*, available at: https://www.theguardian.com/politics/2009/mar/23/muslim-council-britain-gaza (accessed May 5, 2024).

[13] See, e.g.: "The Muslim Council of Britain Officially Requests Inquiry into Islamophobia in the Tory Party" (2018), in *MCB Website*, available at: https://mcb.org.uk/the-muslim-council-of-britain-officially-requests-inquiry-into-islamophobia-in-the-tory-party/ (accessed May 5, 2024).

[14] Harding Th. (2022), "Downing Street Confirms Ban on Muslim Council of Britain Contacts", *The National*, available at: https://www.thenationalnews.com/world/uk-news/2022/07/18/downing-street-confirms-ban-on-muslim-council-of-britain-contacts/ (accessed May 5, 2024).

In the case of **Italy**, public officials played the leading role in bringing together competing Muslim organizations, each of which sought to reach a monopoly status for representing Islam in the country by signing with the government a special cooperation agreement (*intesa*), similar to the concordat of the Catholic Church [Musselli 2002; Pin 2020]. However, various Muslim entities created by the Italian state turned out to be unstable, since they directly depended on the initiatives of individual ministers of the interior, rather than being outcomes of some fundamental policy vision for the future of the Muslim minority. For one thing, already in 2005 the government initiated a special platform – the "Consultation on Italian Islam" (Consulta per l'Islam italiano, CPII) [Mantovan 2010, *101*]. This body had purely consultative functions and consisted of 16 representatives of the Muslim community selected by public officials. In order to replace the dysfunctional CPII, in 2010 the Ministry of the Interior created the "Committee for Italian Islam" (*Comitato per l'Islam italiano*)[15], which, in turn, was transformed into the "Council for Relations with Islam" (Consiglio per le relazioni con l'Islam, *CRI*) in 2016 [Ferrari 2018, *10*]. While the first of these projects brought together Muslim leaders, the leading role in the CRI was allocated to secular specialists on Islam or experts on religious issues in general. Apart from the adoption of a number of declarative documents[16], the effectiveness of all these platforms in accommodating Muslims turned out to be fairly low. Accordingly, in October 2024, members of the CRI announced their refusal to participate further in this initiative due to the lack of dialogue with the authorities[17].

[15] "Costituito al Viminale il Comitato per l'Islam italiano" (2000), in *Ministero Dell'Interno*, available at: https://www1.interno.gov.it/mininterno/export/sites/default/it/sezioni/sala_stampa/notizie/Comitato_Islam_italiano/0776_2010_02_11_Islam (accessed May 5, 2024).

[16] See on this, e.g.: [Ferrari 2018, *426–431*].

[17] "Dimissioni Consiglio per le relazioni con l'Islam: duro colpo al dialogo" (2024), *Agenzia NEV*, available at: https://www.nev.it/nev/2024/10/16/dimissioni-consiglio-per-le-relazioni-con-lislam-duro-colpo-al-dialogo/ (accessed May 5, 2024); Holgado Y. H. (2024), "Si dimette il Consiglio per le relazioni con l'Islam: 'Il gover dialogo' ", in *Editorial Domani*, available at: https://www.editorialedomani.it/fatti/consiglio-relazioni-islam-dimissioni-lettera-governo-interrotto-dialogo-ryv0vdu8 (accessed May 5, 2024).

In the Scandinavian region, the most illustrative case is that of **Finland** where the government's Department for Minority Affairs – following the example of the MCB – played a leading role in the unification of Finnish Muslim organizations into the "Islamic Council of Finland" (*Suomen Islamilainen Neuvost*, *SINE*) in 2006 [Martikainen 2009]. In addition to resolving organizational and legal issues, the Finnish political actors also supported the new institution by providing funding for it from the budgets of several ministries [Martikainen 2019, *40*]. However, already in the mid-2010s, a series of unsuccessful financial decisions led this council to bankruptcy and to the loss of its office spaces and official website. It is noteworthy that in this crisis situation the government, the main initiator of the creation of the SINE, did not take any steps to bail out its official interlocutor: not only did it swiftly cancel the SINE's grants in 2015, but it also tried to reclaim some of the money paid to the council in the previous periods[18]. Accordingly, despite a change in its leadership, in 2016–2017 the position of the SINE could not be stabilized. At the apogee of this crisis, in the spring of 2017 the council found itself at the center of a public scandal that brought to the fore not only financial management problems but also allegations that the SINE harbored an unofficial *shariʾa* committee passing decisions on family matters[19]. The latter provoked a sharp reaction from some politicians in the Finnish Parliament[20].

Finally, in the case of **Norway**, the government, admittedly, did not involve itself in the creation of a Muslim representative structure. However, the Islamic Council of Norway (*Islamsk Red Norge*, *IRN*), which was organized in October 1993 by the major Muslim organizations for participation in the work of the "Interchurch Council of the Church of Norway" [Jacobsen and Leirvik 2010, *389*], soon became the main interlocutor of the Norwegian state. This status was de facto

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[18] Saija Nironen (2017), "IS: Muslimijärjestöt kamppailevat velkaongelmissa", *Yle*, available at: https://yle.fi/a/3-9560153 (accessed May 5, 2024).

[19] Honkamaa A. (2017), "Järjestölle yli 450 000 euron tuki ministeriöltä – sovelsi Suomessa islamin lakia", in *Ilta Sanomat*, available at: https://www.is.fi/kotimaa/art-2000005182570.html (accessed May 5, 2024).

[20] "Kirjallinen kysymys KK 166/2017 vp" (2017), in *Eduskunta riksdagen*, available at: https://www.eduskunta.fi/FI/vaski/Kysymys/Sivut/KK_166+2017.aspx (accessed May 5, 2024).

legitimated in 2007, when the IRN began to receive direct state funding, which was supposed to improve its stability and put its activities on a professional basis [Jacobsen and Leirvik 2010, *389–390*].

Be that as it may, already in 2016 a sharp internal conflict began within the IRN between the president and the executive committee. Moreover, in 2017 the IRN leadership effectively challenged the state by appointing as a communications consultant a woman who publicly advocated for *niqab* and wore it on a permanent basis[21]. This move drew sharp criticism from public officials, as at the time the Norwegian authorities were actively working towards introduction of a ban on this type of Muslim garment[22]. The crisis culminated in June 2017 when the government suspended the funding for the IRN due to its inability to fulfill its representational functions[23]. Despite the fact that this organization managed to survive the crisis and rebuild itself, at the time of this writing no reports of resumption of public funding for it could be obtained.

Cluster 2: Successful state intervention cases. In contrast to the aforementioned cluster, the second group of cases includes those Western European polities where some sort of state involvement in the institutionalization of Islam resulted in the creation of relatively stable – albeit not always thriving – representative structures. A paradigmatic example in this regard is **Austria** where Islam was granted the status of a "recognized" religion already in 1912 with the introduction of the *Islamgesetz* Act after the annexation of Bosnia and Herzegovina by the Austro-Hungarian Empire [Potz 2010; Heine, Lohlker, Potz 2012]. When in the 1970s the new Austrian Muslim communities – formed mostly by migrant workers of Turkish and Balkan origin – tried to initiate practical implementation of the still

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[21] "Kvinne i nikab er Islamsk Råds nye fjes" (2017), in *NRK*, available at: https://www.nrk.no/norge/kvinne-i-nikab-er-islamsk-rads-nye-fjes-1.13447885 (accessed May 5, 2024).

[22] "Kulturministeren hasteinnkaller Islamsk Råd til mote 29. mars 2017" (2017), in *NRK*, available at: https://www.nrk.no/norge/kulturministeren-hasteinnkaller-islamsk-rad-til-mote-1.13450250 (accessed May 5, 2024).

[23] "Kulturdepartementet holder tilbake støtten til Islamsk Råd 28. juni 2017" (2017), in *NRK*, available at: https://www.nrk.no/norge/kulturdepartementet-holder-tilbake-stotten-til-islamsk-rad-1.13579566 (accessed May 5, 2024).

current *Islamgesetz*, one of the basic conditions for this set by the government was that Muslims create a single organization through general elections in local mosques [Mattes, Rosenberger 2015]. As a result, in 1979 the "Islamic Religious Community in Austria" (*Islamische Glaubensgemeinschaft in Österreich*, *IGGiÖ*) was established. It received the legal status of a "corporation under public law" (*Körperschaft öffentlichen Rechts*), the right to collect tax-free donations and broadcast programs on state-owned television channels [Skowron-Nalborczyk 2016, *65*].

The IGGiÖ had retained its monopoly over the representation of all Muslims in Austria (regardless of their actual theological orientation) until the mid-2010s, when – after a new version of the *Islamgesetz* Act was passed by the Parliament in 2015 – some Alevite and Shiite organizations were also granted recognition [Hafez 2017][24]. Furthermore, in the context of the tough counter-terrorism measures and other problematic points of interaction with the state in the early 2020s, the public role and social significance of the IGGiÖ as a Muslim representative structure were strongly questioned – a state of affairs that even prompted questions about the need for "reconciliation" between the IGGiÖ and the government[25]. According to Hafez, the absence of any consultations with this structure before adoption of legislation that directly affects the interests of Austrian Muslims vividly demonstrated this organization's political irrelevance [Hafez 2023, *110*]. Nonetheless, the idea of liquidating or reformatting the IGGiÖ does not seem to be on the current public agenda of the Austrian authorities.

Another notable example in this cluster is **Spain** where a single representative structure for Muslims was created at the initiative – and due to direct intervention – of the state authorities. In the late 1980s, several Muslim communities, mainly composed of former and current Arab students and newly converted Spaniards, sought legal

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[24] "For the official text of the law, see: Bundesgesetz über die äußeren Rechtsverhältnisse islamischer Religionsgesellschaften – Islamgesetz 2015", available at: https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20009124 (accessed May 5, 2024).

[25] "IGGÖ will 'Versöhnung' mit der Regierung" (2023), *Die Presse*, available at: https://www.diepresse.com/6284920/iggoe-will-versoehnung-mit-der-regierung (accessed May 5, 2024).

status of "recognition" under the new Spanish legislation on religion adopted after the end of General Franco's dictatorship [Corpas Aguirre 2010]. After the special commission approved this initiative in 1989, the next logical step for the Spanish Muslim community was to sign a "cooperation agreement" (similar to the Italian *intesa*) with the state. However, as it happened in Belgium and Austria, the basic condition for this set by the government was the creation of a single umbrella structure [Mantecón Sancho 2004, *110*].

Against the backdrop of acute conflicts and the inability of Muslim leaders to reach an understanding on this issue, political actors were forced to intervene in this matter and de facto issue an ultimatum for the two major Spanish Muslim groups [Tarres, Roson 2014, *165*]. This act of "blackmail" turned out to be successful: in February 1992, a single representative structure of Muslims, the "Islamic Commission of Spain*" (Comisión Islámica de España*, *CIE*), was finally established. In April 1992, CIE representatives signed the "Acuerdo de Cooperación", which was approved by the Parliament in the form of a special law in November of the same year[26]. However, due to many unresolved contradictions between its founding members, the unity of the CIE was rather superficial: it remained more of a confederation of two competing actors with a dual power structure in its management apparatus – a state of affairs which effectively undermined the historic significance of the Acuerdo. After a decade of open and latent tensions within the Muslim community, another round of government intervention in the mid-2010s prompted a radical reform of the CIE which resulted in building a more adequate power distribution by giving proportionate weight to the predominant Muslim organization [Mantecón Sancho 2016; Contreras Mazarío 2018]. One can still argue that the pace of implementation of the 1992 Accord continues to be very slow while the organization itself can hardly be viewed as an influential social actor serving the interests of a rapidly growing Spanish Muslim community. Nonetheless, as of 2024, the CIE appeared to be institutionally stable [Rossell 2022].

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[26] "Ley 26/1992, de 10 de noviembre, por la que se aprueba el Acuerdo de Cooperación del Estado con la Comisión Islámica de España" (1992), *Boletín Oficial del Estado*, available at: https://www.boe.es/eli/es/l/1992/11/10/26/con (accessed May 5, 2024).

Admittedly, other countries included in this cluster present less straightforward cases of state involvement in the institutionalization of Islam, both in terms of the mode and in terms of the outcome of this process. For example, similar to many other Western European societies, between the 1970s and the 1990s, the Netherlands witnessed a number of failed attempts to create Muslim umbrella structures with claims to national representativeness [Waardenburg 1988; Shadid, Koningsveld 1996; Rath, Penninx, Groenendijk, Meyer 2001; Sunier 2010]. During this period, the role of the state was mostly limited to monitoring the situation or creating platforms for dialogue between the competing Muslim organizations. However, after the 9/11 terrorist attacks, the Dutch government gradually started to put pressure on Muslim organizations in order to encourage them to unite. In particular, in 2001 the question of organizational unity of Muslims was raised by the Minister of Urban Development and Integration Policy [Musch 2011, *275*].

As a result of the activities of a special working group under the auspices of Dutch public officials, the "Organ for Contact between Muslims and the Government" (Contactorgaan Moslims en Overheid, *CMO*) emerged in 2004 [Musch 2011, *276*]. However, despite all the efforts of politicians, the actual representativeness of this predominantly Sunni entity was immediately called into question, as the CMO de facto excluded Shiite, Alevite and Ahmadi organizations. In view of this, the latter three groups – joined by a small Sunni group – united into a parallel structure, the "Contact Group on Islam" (*Contact Groep Islam, CGI*) [Musch 2011, *277*].

In this light, the Dutch government yet again had to deal with two competing Muslim entities, which were also suffering from internal conflicts. However, unlike Spain where the state de facto forced the merger of two main Muslim groups, in 2005 the Dutch Minister of Integration, based on the recommendations of an external audit, decided to recognize both structures as official interlocutors[27]. At the same time, in 2006 the ministry established a consultative entity – the "Inter-Islamic Platform in Government Affairs" (*Interislamitisch Platform Overheidszaken*, *IPO*) – which was convened by the Minister of

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[27] "Verdonk erkent toch twee moslimkoepels" (2005), in *Dutch Dagblad*, available at: https://www.nd.nl/geloof/geloof/656418/verdonk-erkent-toch-twee-moslimkoepels (accessed May 5, 2024).

Integration at least three times a year as a means of overcoming the difficulties of parallel communication with the CMO and the CGI[28].

Overall, these developments hardly paint a picture of success in arranging relations between Islam and the state, similar to the cases of Spain or Austria. However, as noted in the literature, after 2008 the public activities of the CGI virtually came to naught [Berger 2014, *189*]. By contrast, the CMO has continued to expand its representative base and thus, through natural selection, de facto became the sole interlocutor of the authorities on all issues of accommodation of Muslims in the Netherlands.

Another highly noteworthy case of this nature is **Luxembourg** which, despite the small territory and limited Muslim presence, showcased features of state-mosque policy dynamics characteristic of some major Western European countries with large Muslim minorities[29]. To begin with, in terms of its legislation on religion prior to the pre-2015 reform, Luxembourg represented a peculiar combination of France's Napoleonic era legislation (similar to Belgium) and an agreement style of "recognition" of confessions (similar to Spain)[30]. In this respect, according to the 1848 Constitution, the government could sign *conventions* establishing special relationship with selected religious groups (initially only meant for the Catholic Church). In the present day, after a turbulent period of negotiations and legislative initiatives, in 1998 the Parliament of Luxembourg endorsed such conventions with five confessions, including Protestant, Jewish and Orthodox Christian congregations [Poirier 2011]. This ruling also formally laid out specific criteria for such a form of "recognition", thus opening the possibility for other religions to join the cohort of the chosen few [Manço 2011, *15*].

In this light, the first bid for the recognition of Islam swiftly came in 1998 from the Islamic Cultural Center of Luxembourg (Centre Culturel Islamique de Luxembourg, CCIL), the only notable Muslim

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[28] "Brief van de Minister van Justitie, Tweede Kamer der Staten-Generaal, Kamerstuk 30800-VI, nr. 115" (2006–2007), available at: https://zoek.officielebekendmakingen.nl/kst-30800-VI-115.html (accessed May 5, 2024).

[29] For an overview of Muslim migration to Luxembourg, see: [Besch 2021].

[30] For a detailed analysis of the formation and evolution of the church-state system in Luxembourg, see, e.g.: [Pauly 2005].

organization of the country created by Bosnian migrants in 1984. Although unsuccessful, this bid clearly had a significant effect on the Muslim community, boosting the processes of emergence of parallel organizations in the early 2000s[31]. Without going into detail, it is worth noting the following two points with regards to the major subject of this article. On the one hand, as can be judged from the available reports, the process of creation of an umbrella structure by the three major Muslim centers – *Shoura*, or the Assembly of the Muslim Community of the Grand Duchy of Luxembourg (Assemblée de la Communauté Musulmane du Grand-Duché de Luxembourg), was carried out in 2003 without an apparent involvement of state actors. On the other hand, one can hardly ignore the fact that during this time the Luxembourg authorities were quite forcefully dealing with the matter of a single institutional representation for Orthodoxy, pushing various Orthodox congregations (especially those belonging to the Serbian and Romanian Orthodox Churches) to form a common administrative center under the supreme guidance of the Constantinople Patriarchate [Poirier 2011, *175–176*]. Thus, it seems reasonable to speculate that these actions of the government – that were ultimately deemed as "illegitimate interference" by the court – at the time may have indeed prompted Muslim organizations to act preemptively in order to facilitate the process of Islam's recognition. Moreover, as Poirier argued, the subsequent Islam policies of the Luxembourg government were in fact based on its experience of dealing with the pluralistic situation in Orthodoxy [Poirier 2011, *175–176*].

Be that as it may, in July 2007 the government conditionally approved the first draft of a convention with the Muslim community of Luxembourg which was supposed to be further endorsed by the Parliament[32]. In the context of this analysis, it is essential to note that commenting on this document the Minister of Religious Affairs François Biltgen straightforwardly claimed that establishing a single interlocutor (*un interlocuteur unique*) for the whole Muslim population was one of his primary conditions for signing the convention during

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[31] For a conceptual overview of the institutional landscape of Muslim organizations in Luxembourg see: [Pirenne 2021].

[32] For a detailed analysis of the 2007 draft of the convention, see, e.g.: [Ehret 2021].

the years-long process of negotiations with Muslim leaders[33]. More-over, according to some reports, the minister also stated that his Islam policies were inspired by those of France's Nicolas Sarkozy who played a key role in the successful establishment of the CFCM in 2002–2003[34]. In the following years, however, the implementation of the 2007 convention was stalled due to the fact that Shoura, in its cur-rent form, did not meet the standard of the government for a valid re-ligious interlocutor. Only in 2011, after carrying out a statutory reform and a formal election process (which also included a range of newly created Muslim associations), Shoura was recognized officially as a representative entity [Pirenne, Waltzer 2016, *381*][35].

Thus, although the case of Luxembourg does not showcase the same level of patent government interference in the process of insti-tutionalization of Islam as in France or Belgium, it is evident that the Luxembourgish state played an essential role in shaping the mode of the country's Muslim public representation. In January 2015, *Shoura* as the designated Muslim interlocutor indeed became one of the six confessional entities to sign a new convention with the government whose actual goal was to implement a reform program of further se-paration between church and state in Luxembourg [Ehret 2021]. Ac-cording to this document, as a legal entity, *Shoura* was also entitled to government funding of EU400,000 per year. In stark contrast with similar representative organizations in other Western European coun-tries, it also established the post of *Mufti* who, unlike the President of Shoura, was considered by the state as *Head of Muslim Confession*

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[33] "François Biltgen présente le projet de convention entre l'État du Grand-Duché de Luxembourg et le culte musulman" (2007), in *Le gouver-nement luxembourgeois*, available at: https://gouvernement.lu/fr/actualites/toutes_actualites/articles/2007/07/24biltgen_cultemusulman.html (accessed May 5, 2025).

[34] "Des rapports bien huilés: 21 millions pour les cultes" (2007), *Paper-jam*, available at: https://paperjam.lu/article/news-des-rapports-bien-huiles-21-millions-pour-les-cultes (accessed May 5, 2025).

[35] "Rapport du Groupe d'experts chargé de réfléchir sur l'évolution futu-re des relations entre les pouvoirs publics et les communautés religieuses ou philosophiques au Grand-Duché de Luxembourg" (2012), in *Le Gouverne-ment du Grand-Duché de Luxembourg*, available at: https://www.aha.lu/images/Thema_Trennung/2012_rapport_experts.pdf, p. 125 (accessed May 5, 2025).

("de chef de culte des musulmans" or "Mufti au Grand-Duché de Luxembourg")[36]. Overall, although new Muslim associations kept emerging, in the decade following the signing of the convention *Shoura* indeed demonstrated institutional stability and some public visibility, especially in connection with the issues of Islamophobia and radical Islamism.

Finally, in the "grey area" of this cluster one can place the case of **Sweden**. From a formal point of view, the first Swedish representative structure of Muslims – "United Islamic Communities in Sweden" (Islamiska Församlingar i Sverige, *FIFS*) – emerged in 1974, that is, in the same year as the official "recognition" of Islam in Belgium (1974) and five years before the formation of *IGGiÖ* in Austria (1979) [Larsson 2014]. However, in contrast to these countries, the main impetus for this came not from government actors, but from the so-called "free churches" which tried to strengthen their own position in competition with the official Lutheran Church of Sweden [Borevi, Sorgenfrei 2024, *123*]. Already in the mid-1970s the FIFS was included in a special state committee for interaction with "free churches" (*Nämnden för statligt stöd till trossamfund, SST*) and, after fulfilling a number of organizational requirements, began to receive government funding along with other "recognized" (i.e. officially registered) religious minorities [Larsson 2014, *58*].

However, the "idyll" of the unity of Swedish Islam under the auspices of a single representative structure, created without direct intervention or encouragement from political authorities, proved to be short-lived. Already in 1982, internal ideological and financial conflicts led to a split in the FIFS and the creation of the "Swedish Muslim Association" (*Svenska Muslim Förbundet, SMF*) which began to receive state funding separately. In two years yet another conflict within the FIFS resulted in the emergence of the "Union of Islamic Cultural Centers" (*Islamiska Kulturcenterunionen i Sverige, IKUS*), which also applied for financial support [Cato 2015, *272*].

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[36] "Entretien: Chef de culte des musulmans au Grand-Duché de Luxembourg – dr. Rabie Fares: Le conventionnement a permis au culte musulman d'asseoir sa légitimité" (2020), in *Identitet*, available at: https://identitet.lu/2020/10/22/entretien-chef-de-culte-des-musulmans-au-grand-duche-de-luxembourg-dr-rabie-fares-le-conventionnement-a-permis-au-culte-musulman-dasseoir-sa-legitimite/ (accessed May 5, 2025).

This controversial dynamic strongly complicated the Swedish government's communication with Muslim minorities, posing both the question of fair distribution of funding between the competing Islamic centers and their inability to effectively represent Islam in the SST framework of relations between the state and religious minorities. As a result, in August 1988 political actors launched the "Islamic Cooperation Council" (*Islamiska samarbetsrådet*, *ISR*) which was intended as a coordinating platform for the interaction of the FIFS, the SMF and the IKUS vis-à-vis the SST[37]. On the one hand, one can argue that this body seemed to play merely a *practical* role and was not intended as a full-fledged representative of Muslims, akin to the EMB, the CFCM or the IGGiÖ. In this respect, the emergence of the ISR did not involve any controversy, as was the case, for example, in Belgium or France. On the other hand, some researchers do note that the ISR de facto manifested the same wish of European public officials to have, at least formally, a legitimate Muslim "interlocutor", who would perform both administrative and consultative functions [Larsson 2014, *61*]. In this capacity, the ISR has indeed produced a number of joint public statements on important issues concerning Islamophobia or hate crimes against Muslims[38]. At the same time, though, despite the existence of the ISR, in 1990 major Muslim organizations still considered it necessary to organize into a single, independent-from-the-state umbrella entity, the Muslim Council of Sweden (*Sveriges muslimska råd*, *SMR*), which, however, turned out to be as internally shaky as its counterparts in other European countries.

Cluster 3: "No intervention" or alternative state intervention cases. In stark contrast to the previous two clusters, the third one consists of a motley of European polities where the governments did not seem to directly intervene in the institutionalization of Islam or encourage the creation of Muslim umbrella structures per se. In such cases, however, the authorities could still choose a certain – typically the largest, most active or most moderate – Muslim organization as a

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[37] In subsequent years, other Muslim organizations also joined the platform. As of 2020, IS had seven members that met the requirements for receiving state funding.

[38] "Islamiska Samarbetsrådet: Att bränna koranen är ett hatbrott och ett angrepp mot muslimer!" (2023), in *SMF*, available at: https://smf-islam.se/230628/ (accessed May 5, 2024).

quasi-official interlocutor for public contacts [Scharbrodt 2021, *159*]. Alternatively, they could also come up with other formats for establishing public communication and cooperation with Muslim minorities. These formats, while being rather fluid institutionally, appeared to downplay the significance of large mosque federations in favor of involving a broad range of prominent Muslim individuals with diverse backgrounds.

An example of the first type of such accommodation can be found in Denmark, Portugal and Ireland[39]. In **Denmark**, the formation of Muslim communities by migrant workers and refugees from various regions of the Middle East, as well as the former Yugoslavia [Schmidt 2009], resulted in the emergence of numerous centers of ethnic and ideological orientation [Jacobsen 2014; Jacobsen 2015; Mikkelsen 2019]. In the aftermath of the so-called "caricature scandal" of 2005–2006 [Schmidt 2009, *50–52*; Kühle 2013] there also started to emerge full-fledged umbrella organizations with claims to a national-level representativeness. The most significant of these was the "United Council of Muslims" (Muslimernes Fællesråd, *MFR*), "Danish Muslim Union" (Dansk Muslimsk Union, *DMU*) and "Union of Muslim Associations" (Forbundet af Islamiske Foreninge) [Jacobsen 2016, *197–200*]. However, as noted in the literature, due to its large size, it was the MFR that became the main voice of Muslims in Denmark and a partner of various government bodies in the implementation of integration projects regarding migrants [Kühle 2013, *251–252*].

Generally, though, unlike Belgium, the system of "recognition" of religious minorities in Denmark involves only providing state registration for *specific* religious organizations (and not confessions in general). This status allows these organizations obtaining tax benefits, voluntary donations from citizens through the taxation system and other privileges (such as the right to civil registration of marriages)

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[39] For his part, Scharbrodt illustrated this pattern with the example of Luxembourg where, as he argues, the authorities simply picked the largest organization – the Muslim Community of the Grand-Duchy of Luxembourg (Assemblée de la Communauté Musulmane du Grand-Duché de Luxembourg) – as a "church-like" representative of Islam in the country [Scharbrodt 2021, *159*]. However, as has been demonstrated in this article, Scharbrodt's claim cannot be considered a correct rendition of the situation in Luxembourg.

[Christoffersen 2012; Kühle, Larsen 2019]. Accordingly, for its functioning the Danish model does not essentially require the creation of a *single* representative Muslim structure, allowing mosque associations to receive "recognition" individually.

The most distinctive feature of **Portugal** is a relatively small size of its Muslim community, which was initially formed by immigrants from former Portuguese colonies (in particular, Mozambique) and students from the Middle East. Only due to the increasing labor migration, by the beginning of the 2020s the number of Muslims in Portugal reached, according to unofficial estimates, 70 thousand people, or merely 0.4–0.5 % of the population [Tiesler 2001, *79*; Mapril 2018, *470*]. In this light, the main representative of Muslim believers in the dialogue with the authorities became the "Islamic Community of Lisbon" (Comunidade Islam from Lisboa, *CIL*), operating since 1968 [Pais Bernardo 2015, *237*]. In 2006, it received the full status of a registered religious community with all accompanying privileges[40]. In particular, according to the "Act on Religious Freedom", adopted by the Portuguese Parliament in June 2001, the minority confessions gained the right of performing marriage ceremonies, receiving tax benefits and the right of collecting a voluntary "church tax" from citizens (0.5 % of income)[41].

In general, researchers note that Portugal can be viewed as a case of a minimal level of state intervention in Muslim affairs. According to Tiesler, this was due to the relatively high degree of adaptation of local Muslims to the Portuguese realities [Tiesler 2001, *83–85*]. In particular, the newcomers from Portugal's former colonies had a good command of the Portuguese language and also had considerable experience of living in society as a minority. Accordingly, in Portugal Muslim issues were not as politicized as in other European countries where policies regarding the institutionalization of Islam became an integral part of the acute problem of migrant integration or fighting destructive foreign influences.

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[40] For more information on the benefits of the new law for Muslim communities, see: [Loja 2002, *197–200*].

[41] See the full text of the law: "Law of the Portuguese Republic on religious freedom (2001) (English) Law 16/2001 of 22 June on religious freedom DR IA, n. 143/2001 p. 3666", available at: https://legislationline.org/taxonomy/term/21787 (accessed May 5, 2024).

A similar case to the Portuguese Islam-state arrangement can be found in **the Republic of Ireland** as yet another European Catholic stronghold with a relatively small Muslim community (as of 2022, 1.5 % of the country's population, or 82 thousand people)[42]. The modern institutionalization of the Muslim organizations in Ireland began as early as the 1950s with the emergence of the Dublin Islamic Society [Scharbrodt, Montgomery 2016, *321*]. In 1976, this organization founded the first mosque and in 1990 it was renamed the Islamic Foundation of Ireland (*IFI*) [Khan 2015, *75–90*]. However, in the mid-1990s the IFI's monopoly over Irish Muslim representation was broken with the creation of the Islamic Cultural Centre of Ireland (ICCI) under the auspices of the Al-Maktoum Foundation, which was associated with the Persian Gulf countries [Scharbrodt, Montgomery 2016, *321*]. The opening of the ICCI mosque in 1996 was attended by the President of Ireland, which was as a symbolic confirmation of the political legitimacy of this organization. Further on, the ICCI effectively pushed the IFI into the background and, with the tacit consent of the state, became a quasi-official representative of the country's Muslims in the public sphere during official events and in the context of discussing key religious issues [Scharbrodt, Montgomery 2016, *321–322*]. At the same time, ICCI representatives readily encouraged high ranking Irish officials to visit the mosque, providing the latter with ample opportunities for demonstrating friendly attitudes towards the country's Muslim constituents [Scharbrodt, Sakaranaho 2011, *480*].

In contrast to the strategies of the three peripheral European states mentioned above (and, what is more significant, to other European countries with large Muslim minorities), the government in **Germany** attempted to find its own, unique method of governing the growing presence of Islam in the public space. In particular, unlike Belgium, France and Austria, the German authorities did not take to the idea of creating, by any means available, a united Muslim umbrella structure which in the German religio-political framework needed to be assigned the status of a "corporation under public law" ("Körperschaft des öffentlichen Rechts"), signifying the legal and political recognition of Islam

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[42] "Census of Population 2022 – Summary Results Migration and Diversity" (2022), in *CSO*, available at: https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/migrationanddiversity/ (accessed May 5, 2024).

on a federal level[43]. This approach implicitly acknowledged the fatal inability of the largest Muslim organizations to reach a stable consensus in the long term perspective and also meet a set of strict legal criteria for recognition. Instead, in September 2006 the German Ministry of the Interior launched a fully controlled format of semi-institutionalized communication with Muslims – the "German Islam Conference" (Deutsche Islam Konferenz, *DIK*) [Musch 2011; Tezcan 2011; Musch 2012; Rosenow-Williams 2013; Hernández Aguilar 2018].

In the following two decades after its inaugural session, this "dialogue platform" was regularly "renewed" by different ministers every parliamentary electoral cycle (most recently, in December 2022 on the initiative of the Minister of the Interior Nancy Faeser[44]). In this regard, besides the annual plenary meetings of prominent representatives of the German Muslim community, the DIK's interim working groups have indeed been able to implement a number of initiatives. One of these was government-sponsored studies of the general status of the Muslim faith and the internal life of local Muslim communities in Germany (published in 2009, 2012 and 2020). In addition, the DIK distinguished itself in the public sphere by organizing conferences, making statements on various topics and publishing extended recommendation documents on the introduction of religious education in schools, the establishment of a Muslim social system, the chaplaincy issue, the training of imams, etc.[45]. In this respect, although due to its very fluid format and political locus of control the Conference cannot

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[43] It should be noted, however, that some Muslim organizations can still achieve the status of "recognition" on the level of federal regions (Bundesländer), if they managed to meet a number of strict legal criteria (such as the introduction of a centralized leadership structure and fixed membership). See on this issue, e.g.: [Rohe 2004].

[44] "The DIK's track record to date" (2023), in *DIK Website*, available at: https://www.deutsche-islam-konferenz.de/EN/DIK/Die-DIK-bisher/die-dik-bisher_node.html (accessed May 5, 2024); "Workshop discussion to Continuation the DIK with Federal Minister of the Interior Nancy Faeser" (2022), in *DIK website*, available at: https://www.deutsche-islam-conference.de/SharedDocs/Meldungen/DE/ImDialog/220510-werkstattgespraech-dik-fortstellung.html?nn=598134 (accessed May 5, 2024).

[45] "The DIK's track record to date" (2023), in *DIK Website*, available at: https://www.deutsche-islam-konferenz.de/EN/DIK/Die-DIK-bisher/die-dik-bisher_node.html (accessed May 5, 2024).

be considered a *representative umbrella structure* per se, nonetheless, it has been a notable actor in the production of discourse on Islam and Muslims in Germany [Rosenow-Williams 2013; Forkel 2014].

Finally, the situation of **Switzerland** presents yet another special case in the cluster of Western European societies with significant Muslim minorities. On the one hand, as well as elsewhere in this region, since the 1970s the processes of rapid institutionalization of Islam have resulted in the formation of prominent Swiss social actors which aspired to represent Muslims at the highest level [Banfi 2023]. The standard consequence of this process has been the plurality of organizational centers and slow-burning conflicts between them. On the other hand, though, a crucial feature of the Swiss political system was that, according to the federal constitution, the establishment of a *specific* system of state-church relations beyond the fundamental principles of freedom of religion was allocated to the purview of the local authorities of the 26 federal units (*cantons*) [Kiener, Kempe 2016; Vallier, Zimmermann 2020]. Hence, due to this constitutional framework, the federal government in Switzerland could not in fact meaningfully pose the question of "recognition" of Islam or prompt the formation of a single Muslim "interlocutor" for the state on behalf of all Swiss Muslims.

Conclusion. This overview of sixteen European countries with non-indigenous Muslim populations demonstrates that the choice of state policies concerning interaction with highly heterogeneous Muslim communities has been determined by a combination of objective and subjective factors predominant in each specific context. In this regard, it is highly indicative that common socio-political, legislative or cultural backgrounds of certain countries (such as Spain and Italy or Germany and Austria) did not automatically translate into deployment of similar government strategies of accommodation of Islam through the formation of representative umbrella structures. By contrast, countries with rather different frameworks of state-church relations (such as Belgium and France), due to a range of political motivations, could adopt comparable approaches to shaping practical policies on this issue. It remains unclear though how these patterns actually emerge, as governments have generally eschewed revealing the sources of inspiration for their concrete policy choices (i.e. if these choices were indeed made after observing other countries' policies or

reached independently), leaving researchers and analysts a wide space for speculation.

Assessing the big picture in his 2012 monograph, Laurence optimistically argued that Muslim councils could indeed over time lead to the formation of "a new politics of distinctly European state-mosque relations" [Laurence 2012, *26*]. However, from the perspective of the mid-2020s, it is evident that the policy of state interference with the "natural" dynamics of the institutionalization of Islam in European countries can hardly be viewed as a success story. Indeed, in two thirds of them the governing authorities either encouraged, facilitated and legitimated, or directly participated in the creation of Muslim representative structures. In six countries (Belgium, France, Italy, Norway, Finland and the UK) such structures either collapsed due to internal issues or their relationship with the state actors deteriorated to a point of conflict, rendering the arrangement inadequate for its original purposes.

In the meantime, while the Muslim interlocutors in Spain, Austria and Luxembourg remain institutionally stable, their long-term survival without constant political oversight and state funding might be problematic in the long run. Moreover, their actual social significance as public advocates for the interests of Muslims is often questioned due to their inability to achieve maximum inclusivity and to influence government policies in such areas as legislation on religion or counter-terrorism measures. In the case of the Netherlands, the unifying efforts of public officials resulted in the creation of two parallel umbrella structures with different confessional bases; only the organizational failure of the Shia-Alevite alliance allowed the Sunni dominated entity to become the primary official representative of Muslims in communication with the government. Finally, in Sweden the authorities did manage to bring into existence a stable institutional platform uniting major Muslim organizations. However, its secret of success appears to reside in its mostly practical function, i.e. the facilitation of distribution of state funding, rather than playing the symbolic role of a single public voice for the Muslim minority as a whole.

On the other side of this spectrum, there is a group of five countries where the issue of creating a single representative Muslim organization did not turn into a policy priority worthy of a direct involvement of political actors. In the case of Switzerland, such an

involvement was prevented by the very constitutional framework regulating church-state relations. In Portugal, Ireland and Denmark it made more sense for public officials to *designate* as a "quasi-interlocutor" the largest Muslim organization with a consistently moderate, "accomodationist" orientation. Alternatively, in the case of Germany (and also France after February 2022), the state abandoned as unfeasible the idea of bringing into existence a fully fledged institutional representative for Muslims in favor of the alternative format of a "conference" (or a "forum") which – while being convened and tightly controlled by government officials – brings together authoritative Muslim individuals (religious specialists, public intellectuals, activists), rather than competing Muslim organizations with conflicting ideological agendas. However, the actual long-term effectiveness of this paradigm of "soft" involvement in Muslim affairs vis-à-vis the governance of transnational Islam through establishment of "traditional" representative structures still remains a matter for further research.

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Д. В. Шестопалець

СУЧАСНА ПОЛІТИКА ЩОДО АКОМОДАЦІЇ ТРАНСНАЦІОНАЛЬНОГО ІСЛАМУ В ЗАХІДНІЙ ЄВРОПІ: УСПІХИ І НЕВДАЧІ МУСУЛЬМАНСЬКИХ РЕПРЕЗЕНТАТИВНИХ СТРУКТУР

Стаття присвячена проблемі участі держави у створенні представницьких парасолькових структур для мусульман у Західній Європі, починаючи з 1970-х років. Базуючись на широкому спектрі попередніх досліджень, офіційних документах і повідомленнях

ЗМІ, це дослідження пропонує загальний огляд поточного стану зазначеного питання у п'ятнадцяти європейських країнах із різними моделями церковно-державних відносин та різними розмірами мусульманських меншин. На найбільш базовому рівні стаття демонструє, що вибір державної політики в цій сфері радше був детермінований поєднанням об'єктивних і суб'єктивних факторів, що домінують у кожному конкретному контексті, а не певною загальноєвропейською парадигмою, яка ґрунтується на принципах секулярності. Щодо цього дуже показовим є те, що близькі соціально-політичні, релігійні чи культурні бекграунди певних суспільств не привели автоматично до розгортання в них подібних стратегій адаптації ісламу через формування єдиних репрезентативних центрів. І навпаки, країни з відмінними державно-церковними устроями, але схожими політичними мотиваціями часто застосовують подібні підходи до вирішення цієї проблеми. Щоб проілюструвати це, у статті виділено три основні категорії випадків відповідно до рівня участі держави та рівня успіху суб'єктів парасолькового типу у виконанні ними визначених завдань посередництва між мусульманськими громадами та владою. Загалом, основний аргумент цієї статті полягає в тому, що, незважаючи на деякі початкові оптимістичні оцінки цих процесів у науковій літературі, з погляду середини 2020-х років, політику безпосереднього державного втручання у "природну" динаміку інституціоналізації мусульманських меншин навряд чи можна розглядати як ефективний засіб управління сутнісно транснаціональною природою європейського ісламу як конгломерату різноманітних – що часто конфліктують між собою – теологічних, культурних і політичних орієнтацій.

Ключові слова: іслам, мусульмани, Західна Європа, інституціоналізація, держава

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