

Muslims in Europe and in the United States. Transatlantic comparison.

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Representing and regulating Islam in France and in the Netherlands

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1. Introduction

I will use this brief introduction to discuss the various ways Islamic presence and practice have been simultaneously *represented and regulated* over the past years in France and in the Netherlands. In both countries Islam has been high on the agenda of policy makers and politicians, especially since dramatic events such as the terrorist attacks in the US in 9/11, in Madrid (2004) and in London (2005) and the assassination of Theo van Gogh in Amsterdam in November 2004.

The actual regulation of Islamic practice in Western Europe (and the forms and degrees of religious freedoms for Muslims) can be seen as the outcome of interactions between Muslims (individual citizens and organisations) mobilizing to articulate demands, provide for their needs and defend their interests, and a wider political, legal and policy context (or ‘opportunity structure’). The latter involves at least three factors.

First, a particular *State-Church regime* consisting of a constitution, laws and regulations (related to religious freedom, the neutrality of the state, equal treatment), and a specific legal tradition informed by each country’s particular history. Seen in this light Islam can be seen as an aspect of the religious diversity which characterises European societies (which include a variety of different religions (protestant, catholic, Judaic, Hindu) and ideological groups (religious and non-religious)). The regulation of Muslim practice and Muslim presence can be (and is) conceptualised as involving the regulation of a (relatively newly established) minority religion in European societies.

Second, the discourses and sets of policies relating to the regulation of ‘cultural diversity’, nationhood and citizenship, and in particular the kind of immigrant integration policies, which have been developed by national and local governments in Western Europe since the 1980s (cf. Fetzer and Soper 2005). Here we

see over the past years a fierce critique of ‘multiculturalism’. The French have been most consistent in speaking about a French ‘exception’ in this domain, seeking to base immigrant integration policies on the Republican version of assimilation of newcomers into French society as individual citizens, and as the conscious and explicit refusal of the French state to adopt any kind of ‘multicultural policy model’ of incorporating newcomers as ‘communities’ or as ‘groups’. In the Netherlands since the late 1990s the earlier ‘multicultural’ Minorities Policies model (developed in the early 1980s) has come under fire. Now immigrant integration policies are based on the requirement of newcomers to learn about Dutch society, to learn the Dutch language (also in order to be able to participate and find a job in Dutch society) and of making an effort to adapt to prevailing norms and values of Dutch society. In this domain there seems to be convergence in Europe towards ‘tougher’ immigration policies and more demanding (i.e. more assimilationist) immigrant integration policies (Bader 2005).

Third, specific ways of framing (aspects of) Islamic presence or practice, making them in one way or the other ‘problematic’ and calling for efforts to regulate behaviour, practices and symbols. There is perhaps a general debate about ‘Islam’ in France and in the Netherlands, but there is most of the times a debate about specific aspects of Islamic presence and practice: about the headscarf, about imams, about Islamic schools, about mosques (and their size, architectural style, location in the city), about radicalisation, about blasphemy etc. I think these processes of ‘framing’ should be a focus point for our analysis, because they might help shed light on important differences between the US and Europe, and also between different countries in Europe. It is around a limited set of ‘emblematic issues’ that contentious processes occur. Argumentations for or against interventions and regulating measures (developed and implemented by a variety of actors such as the state, municipal authorities, Muslim leaders, school boards, community workers etc.) are articulated, discursively constructed and contested, not in the abstract, but around specific issues.

Therefore in this intervention I will comment on some of these issues or aspects of Muslim practice which have become ‘emblematic’ for Islamic presence, and to see why and how, and to what consequences. I hope to explain a bit more for an American audience *what according to the actors and voices in debates in Europe appears to be at stake when it comes to Islam* and why they come up with specific proposals and ideas. This process of problematizing and framing ‘Islamic presence’

occurs within the horizon of specific state church regimes. I will begin by briefly naming the main characteristics of the Dutch and French model.

2. A brief overview of French and Dutch State-Church regimes

Leading expert Sylvio Ferrari speaks of three principles constituting a common pattern of Church State relations in Europe: the right to religious liberty (including freedom of conscience, freedom to express a religious identity, freedom to worship and freedom to practice ‘in community with others’); the religious incompetence of the State and the autonomy of religious groups; and the selective co-operation of states and religious groups (Ferrari 2000, 2002, 2005). Despite the convergence at the level of underlying principles (also Koenig 2005, 2007) there are important differences between national models, as becomes clear when juxtaposing the French and Dutch model.

The French model of strict separation based on the principle of *laïcité*. One of the key aspects of the French model is the existence (and protection by the state) of a public space that is neutral with respect to religion (cf. Kriegel cited in Bowen 2006: 14). In order not to privilege any religion or school of thought, the French state, as the law of 1905 stipulates, does not recognize or fund any religion. On the other hand the organized religions in France are requested by the state to present a single ‘privileged interlocutor’. The formation of the French Council of the Muslim Religion in 2003 was aimed to establish this kind of institutionalised interlocutor for Islam and Muslims in France (Caeiro France Report: 197). Another characteristic of the French model is the ways the model of (and discourses on) State Church patterns is related to the Republican political model, in which the state constructs institutions and policies designed to integrate newborns and newcomers in to French society by teaching them certain ways of acting and thinking (Bowen 2006: 11), and in which citizens are called upon to leave their particular identities and their affiliation to specific groups or communities behind them when expressing their interests and ideas in the public sphere.

The Dutch model can be characterised, following the American scholars Stephen Monsma and Christopher Soper, as a model of ‘principled pluralism’, and consists of four characteristics. First, the overall emphasis on equal treatment and even-handedness, applying both at the level of individual citizens and at that of groups or communities, and of religious or ideological associations. Second, the

Dutch model starts off from the assumption that a democratic public sphere consists of a plurality of religious and non-religious denominations and ideologies. Instead of claiming that the State should itself establish and maintain a “neutral” public sphere — as is assumed in the French Republican model for instance — the Dutch model is based on the assumption that so-called “neutral organisations” are not truly neutral “but are yet another *richting*, or direction, equally legitimate but no more legitimate than a host of other religious and nonreligious philosophies or directions” (Monsma and Soper, 1997: 80). Third, in the Dutch model, religious and ideological associations are seen as valuable elements in the civil society. In principle, then, the State wants to approach these associations with goodwill, because these organisations personify organised citizens, who are willing and able to organise their own life, and such organisations can function as counterweights to the dominant position of the State and its institutions. Fourth, the Dutch model attributes a central importance to the freedom of choice of individual citizens. This implies that individual citizens should have several meaningful options from which to choose. For example, in the domain of education they can choose from a number of different school types and are not obliged to send their children to one single type of State school. Moreover, “if religion is to be fully free, government must take certain positive steps to accommodate it so that religion, along with secular beliefs, can in practice be freely exercised” (Monsma and Soper, 1997: 81). However, the importance of individual freedom of choice also implies that citizens are protected by the State if they decide to abandon their religious beliefs or step out of their religious community

Even though it is important to understand these (national) legal guarantees and models, we should also look at the specific ways the law is applied (by a variety of actors) when it comes to Islam and Islamic practice. This involves a lot of interpretation, framing and public reasoning.

3. Problematising Muslim presence and Islamic symbols and practices

The actual regulation of Islamic practice in France and in the Netherlands, and the ways the ‘legal status of Islam’ has been subject to public debate and policy making over the past years, requires us to look at several ‘emblematic issues’. I will briefly mention two for each country. For France: the debate on the headscarf and the ban on religious signs in public institutions and in particular in public schools, and debates on mosques and the role of the state. For the Netherlands: discussions on

Muslim faith based schools and the recent discussion on a possible ban of the ‘burqa’ or ‘niqaab’ in all public places.

France:

The debate on the headscarf

The French debates on the headscarf, and the 2004 law banning religious signs from public schools in France are well known (cf. Kastoryano 2006). Let me briefly recapture here the analysis by John Bowen in his new book *Why the French don't like headscarves* (2006). Bowen reconstructs the public reasoning around the headscarf in France, especially in the period leading up to the law prohibiting from public schools any clothing that clearly indicated a pupil's religious affiliation. Bowen argues that one of the key underlying issues was how to respond to the demands of Muslims who demand to be visibly different, and thereby defy older cultural notions of France. However, in reconstructing the public debate and the motives that were articulated in favour of banning the veil, it becomes clear that the debates did not focus on this aspect. The concern about the headscarf in France can be understood by seeing how “a bit of cloth” became linked to three major social concerns: about communalism (the closing in of ethnically defines communities on themselves); about Islamism (a political project to reshape public life around Islamic norms) and about the denigration of women (sexism). Banning the veil in order to defend *laïcité* became a way for politicians to show that they were responding to France's new enemies (2006: 242-243). The history of the law against religious signs in public schools was also a result of a particular way of framing the issue in French media. What seemed to be at stake was also “the fear that a public Islam challenges particular institutions that guarantee life together in the Republic – a public space from which ethnic, religious, and other characteristics are erased, and the public schools that model for their pupils the erasure of differences and the collective embrace of the Republic” (2006: 246). By making a special law, French politicians could show that the state was able and willing to act upon these different, urgent societal issues – for which the headscarf had come to stand.

New debates on mosques and state funding¹

If we leave aside the establishment of newly built mosques in France in the colonial period (notably in Paris, but there were also projects in other cities such as Marseilles, Bordeaux and Lille), Islamic houses of worship have been on the public agenda in France since the 1980s. Most prayer rooms in France had been developed in existing premises, often in the basements of large apartment complexes where immigrants lived. Hence the term “the basements of Islam” (*les caves de l’islam*) and it’s correlate the “Islam of the basements” (*l’islam des caves*). What seemed to be problematic about these specific places of worship? **First**, they were problematic because they were *inadequate*, there was a lack of space, prayer rooms were unsafe and often unhygienic, they could not cater for activities such as larger gatherings during the Ramadan or the Sacrifice Feast, or cultural and educational activities. **Second**, these prayer houses were seen as illustrative of the discrimination against immigrants, and of the marginal social position of Muslims in particular. They symbolized the unequal position of Islamic practice, which was put away in ‘basements’, a situation that stood in glaring contrast to the beautiful Christian Churches and synagogues in France. Those building were more beautiful and more visible, also because of their more central location (such as the beautiful synagogue of Marseilles). **Third**, they were problematic because they were hidden and might be places where extremists could ‘hide’ and preach their orthodox, anti-integrative discourses. According to many commentators putting away Islamic practice in ‘basements’ was a bad idea, because Islam in France (and elsewhere as well) should be brought ‘into the light’.

Was a solution then to replace these small houses of worship by large mosques, which could cater for a whole range of activities and which would be visible and identifiable. Many people in France were opposed to the establishment of larger mosques as well, because these mosques might be *too big*. **First**, they might be so big that small Muslim communities and organisations could not finance them by themselves, and they would be forced to bring in foreign donors which might threaten their independence and open the door to transnational radical Muslim movements. The idea of bringing in large sums of money from countries in the Middle East or in

¹ On this see Césari 2005, Césari (ed.) 2005, De Galembert 2005, Maussen 2007 (forthcoming).

North Africa to build mosques in France was therefore also rejected (both by French politicians and by representatives of Muslim associations). **Second**, these mosques would be too visible as symbols of Islam in a country that, at least according to the extreme right Front National, should remain culturally predominantly Christian and/or Secular. The majority culture should be visible in the urban landscape, not Islam. **Third**, these kind of mosques or 'Islamic centres' would be catering for a variety of activities and thereby they might become 'parallel societies', 'safe havens' or 'enclaves' of Muslims, located within French cities but not part of the surrounding (majority) society, with little possibilities for exchange and debate between Muslims and non-Muslims.

What to do then? One idea which came up in the second half of the 1980s was to develop Cathedral Mosques (*mosquées cathedrales*), which would be 'French' and which would stand for an 'Islam of France' (Maussen 2005, 2007 (forthcoming)). These mosques would be open to a French audience, they would be beautiful, they would fill Muslims with pride, and so they would serve integration. These kinds of projects were developed in Lyon, in Marseilles, in Strasbourg, and in Rennes.

In the wake of 9/11, one of the ideas to obstruct Islamic radicalism was to accelerate the incorporation of Islam in France, in order to take away feelings of rejection (especially among younger Muslims)². Starting off from the assumption that radicalism was growing rapidly in these 'basements of Islam', it seemed plausible for public authorities and other stakeholders to intervene (also financially) to improve houses of worship. Since many small scale Muslim communities seemed to prefer to maintain their own house of worship the new aim became to improve 'neighbourhood mosques'.³ In 2005 the then Minister of Interior, Nicolas Sarkozy, suggested to establish a fund to be used to financially support the establishment of mosques in France.

Recently the so called *Commission de réflexion juridique sur les relations des cultes avec les pouvoirs publics*, presided by Jean-Pierre Machelon, published a report on the matter (September 2006). This commission has in particular focused on the issue of places of worship and burial places in France. It has suggested, amongst other things, to create more possibilities for using public funds to establish houses of worship, and changing the 1905 law in this respect. This report has led to a fierce

² This was already a theme in the 2000 report of the High Council on Integration Islam in the Republic.

³ See Caeiro France report, also Frégosi (ed.) 2004.

debate in France, and to my knowledge the outcomes of this new debate still have to become clear.

Imams (refer to work of Frank Peter, Alexandre Caeiro, Fhrad Khosrokhavar, Franck Frégosi)

The Netherlands

Muslim faith-based schools

Article 23 of the Dutch constitution, a result of ‘the great compromise’ of 1917, guarantees the freedom of education. It lays down that so-called ‘denominational’ schools will be funded by the state on a par with ‘public schools’. All schools provide a roughly similar curriculum, but they have the liberty of choosing their own educational methods and deciding on extracurricular activities and religious education. Muslim faith-based schools, also called Islamic schools, are financed by the government. The first Muslim primary schools opened their doors in Rotterdam, The Hague, Eindhoven and Amsterdam in the late 1980s. In 2006 there were 46 Muslim primary schools and two Muslim secondary schools in the Netherlands (Merry and Driessen 2006; Maussen Report The Netherlands: 108ff.).⁴

Demands have been voiced in public and political debates to limit the possibilities for founding Muslim schools. In the second half of the 1990s, a number of Islamic schools caused a stir because they used videos and lesson material provided by the organisation Al Aqsa, which is affiliated to Hamas, and the Saudi organisation Al Waqf al-Islami. The enquiry focused on the interference of “political Islamic groups and foreign powers in the Islamic education in the Netherlands”⁵ and showed that Dutch authorities — for example the Inspectorate of Education — have few opportunities to provide a counterweight to the “anti-integrative tendencies” in Islamic primary schools, in Islamic religious education and in teaching native language programmes (*Onderwijs in Allochtone Levende Talen*).

⁴ Initiatives have been taken in various municipalities for Muslim religious instruction to be offered in State primary schools; this, however, has actually been achieved only on a very limited scale (see Shadid & Van Koningsveld 2006).

⁵ See Binnenlandse Veiligheidsdienst [Home Security Service] *De politieke islam in Nederland* [Political Islam in the Netherlands] (1998) and *De democratische rechtsorde en islamitisch onderwijs*. [The Democratic Legal Order and Islamic schools] (2002).

The Inspectorate for Education published extensive studies on Islamic schools in the Netherlands in 2002 and 2003. In 2003, it was concluded that the education in Islamic schools “is not opposed to the central values of the democratic constitutional State, and (that) the schools under examination foster more or less the conditions for integration of the pupils”.⁶ Recent investigations by the Dutch Inspectorate of Education have concluded that almost all the Islamic schools have an open attitude towards Dutch society, and play a positive role in creating conditions for social cohesion (Merry and Driessen, 2005: 422).

In the Spring of 2004, the Minister of Education Van der Hoeven presented a memorandum to the Lower House determined that any new Islamic school must have a school board that comprises only members of Dutch nationality. The government also announced the development of an adequate method of Muslim religious education.⁷ A general ban on Muslim schools was impossible given the constitutional freedom of education (article 23 of the Dutch constitution, see Shadid and van Koningsveld 2006: 86) The only possibility would be a change of article 23 and ending the principle of freedom of education and the equal funding of public and confessional schools. This issue was added to the public agenda by Ayaan Hirsi Ali and others.

Summing up we might say that the framing of Islamic schools in the Netherlands has made them appear as ‘problematic’ for a number of reasons. They are problematic, **first** because they are said to perform poorly according to educational standards (see Inspectorate of Education).⁸ **Second**, because they contribute to segregation along ethnic, religious and socio-economic lines. They obstruct possibilities for exchange and emancipation among children and teenagers. **Third**, they are said to try and indoctrinate students with archaic views, with radical ideas and with ‘anti-integrative ideas’ concerning the position of women, Dutch society in general, attitudes to homosexuals, Jews and non-believers etc.

⁶ See “Islamitische scholen nader onderzocht” [Islamic Schools Revisited] (2003: 2). Earlier reports of the Dutch Inspectorate of Education were “Inspectierapport. Islamitische basisscholen in Nederland” [Islamic Primary Schools in the Netherlands] (1999); “Islamitische scholen en sociale cohesie” [Islamic Schools and Social Cohesion] (2002). See also “Zachtjes lachen mag. Islamitische scholen in een land van ongelovigen”, *NRC Handelsblad*, 4/5 December 2004.

⁷ This is being developed together with the Islamic School Boards Organization (ISBO) (see Shadid and van Koningsveld 2006: 83ff.)

⁸ Recently the fact that an Islamic secondary school in Amsterdam produced the worst record in educational achievement of the whole country has led to calls to close this school.

We might note that there is an underlying conflict here about 'integration strategies' which is being played out around the issue of (Islamic) education. The pillarization model and the 'multicultural model' emphasised the right to be different and the possibility of 'emancipation within one's own set'. The existing State Church regime and the principle of freedom of education still testify of these ideas. However, the assimilationist model (or post-multicultural model) wants people to mingle, and to become individual citizens not members of communities or groups. In this sense a reform to change the Dutch model and to move towards a single public school ('French style') is being advocated (see for an overview of these debates Maussen 2006).

The 'burqa ban'

Finally, I would like to briefly mention another issue, which has been widely mediatised, also here in the US, being the proposed ban on the 'burqa', a dress covering the whole body, including the face. The plan is to outlaw the face-covering burqa in all public places. This proposition was made in October 2005 by far right politician Geert Wilders (who, by the way, obtained 9 out of 150 seats in the Dutch Lower House in November 2006). Accepted by a majority in the parliament, the proposal was addressed to the Minister of Integration and Aliens' Affairs, the political hardliner Rita Verdonk (Liberal Right, VVD).

The reasons given for a ban on the burqa were several. **First**, it is said to constitute a risk of safety, because women who wear the burqa cannot be identified. **Second**, the burqa was said to obstruct integration, as it obstructs contact, conversation, it dramatically reduces the possibilities for women to find a job in the Netherlands and participate in a great number of activities. Several municipalities (in Utrecht, Amsterdam) have proposed to cut the unemployment benefits of women who decide to wear a burqa and who as a result cannot find a job. In a similar way the burqa can be interpreted as a symbolic statement of a 'refusal to integrate'. **Third**, many people also believe that this particular form of dress violates the basic norms of a democratic society and is beyond what might be seen as the range of reasonable ways of expressing difference through dress. Of key importance in this respect is, of course, the issue of gender equality.

There has also been a lot of opposition to this proposal for a general 'ban on the burqa'. **First**, the number of Muslim women in the Netherlands actually wearing a

burqa is infinitely small, and the actual nuisance or risk this might pose to Dutch society are very unclear (if it might exist). Therefore a special law or ban seems primarily to serve political interests. In an advice on the matter the *Standing committee of experts on international immigration, refugee and criminal law*, called a ban ‘disproportional’ and a violation of the freedom of religion and the principle of non-discrimination on religious grounds.⁹ The commission argued that there was no ‘pressing social need’ for a ban, and such pressing social needs have to be at stake in order to curtail individual liberties. **Second**, some have argued that the law might have perverse effects, such as leading to more harassment or religiously motivated attacks against Muslim women, or to a growth of the number of women who will begin wearing the veil as a sign of protest.¹⁰ **Third**, because of the principle of equal treatment a general ban on any kind of ‘face covering’ might be necessary, and this would lead to an unwanted ban on helmets, masks etcetera in public places.

The last thing has not yet been said on the matter, especially not because a new coalition government will in the coming months accede to power.

Mosques (refer to Maussen 2004, 2006)

Concluding remarks and points for discussion

Let me conclude by mentioning a few things we might further discuss today. First, I think that my intervention and that by Frank Peter can be understood as a plea to go beyond the description of national State-Church regimes, and to also study *application and interpretation*. This process of interpretation occurs in particular contexts, shaped both by a country’s history, by specific (inter)national events, specific political landscapes, and it focuses on specific issues which have become ‘emblematic’. It also occurs in specific settings and practices: in municipalities where politicians, representatives of Muslim associations and of resident’s associations negotiate about the establishment of a mosque; schools deliberating about the way to approach Muslim girls who want to wear the headscarf or teachers who refuse to shake hands with members of the opposite sex; in prisons and canteens about the

⁹ See ‘Notitie van de permanente commissie van deskundigen in international vreemdelingen- en strafrecht naar aanleiding van de motie Wilders die een verbod van het openbaar gebruik van een burka voorstaat’ June 2006. See also Dutch Equal Treatment Commission "Niqab and headscarves in schools" (April 2003), available at: <http://www.cgb.nl/downloadables-en.php>

¹⁰ See ‘Beyond a planned Dutch ban’ in *The Economist*, November 25 2006.

ways to accommodate dietary requests. In all these places there is public reasoning and forms of regulation and negotiation. Studying these might also help us to overcome the reproduction of static (if not stereotypical) images of countries, which are based on a description of the formal legal guarantees, and which are very important in public debate (such as the idea that the French model is ‘unique’ or that the Dutch model consists of organised ‘segregation’). Besides, analysing and describing actual practices of interpretation and application might also make our work more useful to help those actors who actually have to deal with these issues on a daily basis. It might add to their capacity of contextual judgements, being able to defend key democratic principles (equal treatment, religious freedom) while also addressing pragmatic concerns (i.e. maintaining a pleasant educational environment at school, determining whether measures are proportional with respect to the goals they serve etc.).

Second, can we identify specific characteristics of the *European* debate on Islamic practice and on the ways the status of Islamic practice is being (re)defined in Europe? I would argue that besides the issues of security and terrorism, especially important since 9/11 (discussed this morning), a central characteristic of the European debates is the nearly complete fusion of discussions about Islam with discussion on ‘immigrant integration’. Yasemin Karakasoglu has mentioned the importance in public discourse of the distinction between ‘good’ and ‘bad’ Muslims. This distinction is discursively constructed via the oppositional categorization of Muslim religious beliefs and practices (liberal versus orthodox, integrated versus non-integrated, peaceful versus violent, privatised and discrete versus publicly visible and militant). John Bowen has argued that the ‘integration’ lens (partly produced in French academic discourse on Islam), is very important in France, but something similar can be said about the Netherlands. This lens makes a specific form of Muslim religiosity and practice stand out as an illustration of successful ‘integration’, thus opposing it to other forms of ‘being Muslim’ that are said to illustrate failed integration, the refusal to integrate or ‘radicalisation’ (cf. Bowen 2004: 45ff.).

Two factors might help explain this ‘fusion’ of debates on Islam and on immigrant integration. First, the fact that the Muslim population in Western Europe is in its vast majority ‘of immigrant origin’. Therefore it is understandable that the framing of Muslim practice is often borrowing from the vocabularies of immigrant integration processes, and using terms such as ‘adaptation’, the opposition of the

beliefs and practices of the ‘second generation’ with those of ‘first generation’ immigrants, or the characterisation of cultural habits and beliefs as ‘imported’ etc. Second, the diversity and the dynamics of Muslim religious practice in Europe, especially among young Muslims, seemingly cannot be accounted via a simple, linear process (of ‘secularisation’, of ‘growing unbelief’ etc.). Perhaps this makes it plausible to think about it in terms of a clear cut opposition of ‘failed’ versus ‘successful’ ‘integration’. Thus policy makers at least seem to have some clue about what is going on and about the direction of change, which helps them to construct a version of reality that they can act upon (i.e. stimulating integration in order to bring about a more ‘liberal’ version of Islam).

Still I think this framing is very problematic, and Europe might perhaps learn from the US at this point. It is problematic because in the case of Muslims, religious freedom, equal treatment and the right to be different is *made conditional upon* a sufficient level of ‘integration’. This creates opportunities for a long lasting form of unequal treatment of Muslims, who continue to be seen as ‘of immigrant origin’ if not as ‘second class citizens’. One right wing populist Dutch politician, Marco Pastors, put it bluntly: ‘religions that are not integrated should be treated differently’. The immigrant integration frame seems to obstruct another possible view of Islam, namely as simply a part of the cultural and religious diversity of contemporary French and Dutch society.

Finally, a note of warning. In my report I objected to the continued use of the term ‘islamophobia’ to analyse discussions such as those which I have discussed here. Understanding the subtleties involved in these attempts to ascribe meaning to Islamic presence and to ‘problematise’ aspects of Islamic practice, requires researchers to make an effort to understand what according to actors seems to be at stake. Of course, not every argumentation needs to be taken at face value, and there are many examples of argumentations in which ‘mosques’ or ‘headscarves’ become ‘the problem’ whilst the actual object of concern seems to lie elsewhere. Still, simply reducing all argumentations which problematise aspects of Islamic practice or presence, to an irrational ‘fear of the unknown’, as the American philosopher Martha Nussbaum recently argued commenting on the ‘burqa ban’ in an article in a Dutch newspaper¹¹, seems to me to be a pointless endeavour. It is too simplistic to reduce these debates to

¹¹ Martha Nussbaum ‘Boerkaverbod komt voort uit irrationele angst’ in *NRC Handelsblad* December 5 2006.

a simple confrontation between the 'friends and enemies of Islam' or to a debate between those who are open minded and who love the 'other's Otherness', and those who are narrow minded and who are afraid of 'difference'.

Thank you,

References:

- Bader, V.M. (2005) Dutch nightmare? The end of multiculturalism? *Canadian Diversity* 4 (1):9-11.
- Bader, V.M. (2007 (book under review)) *Democracy or Secularism? Associational Governance of Religious Diversity*.
- Bowen, J.R. (2004) Beyond Migration: Islam as a Transnational Public Space *Journal of Ethnic and Migration Studies* 30 (5):879-894.
- Bowen, J.R. (2006) *Why the French don't like headscarves. Islam, the state and public space*. Princeton and Oxford: Princeton University Press.
- Caeiro, A. (2005) 'Religious authorities or political actors? The Muslim leaders of the French representative body of Islam' in Cesari, J. and McLoughlin, S.(eds) *European Muslims and the secular state*. Hampshire: Ashgate.71-84.
- Cesari, J. (2005) Mosque Conflicts in European Cities: Introduction *Journal of Ethnic and Migration Studies* 31 (6):1015-1024.
- Cesari, J. (2005) Mosques in French Cities: Towards the End of a Conflict? *Journal of Ethnic and Migration Studies* 31 (6):1025-1043.
- Driessen, G. and Merry, M.S. (2006) Islamic schools in the Netherlands: Expansion or marginalization? *Interchange* 37 (3):201-223.
- Ferrari, S. and Bradney, A. (2000) *Islam and European Legal systems*. Aldershot: Ashgate/Darhmouth.
- Ferrari, S. (2002) 'Islam and the Western European Model of Church State Relations' in Shadid, W. A. and Koningsveld, P. S. v.(eds) *Religious Freedom and the Neutrality of the State: Responses to the Presence of Islam in the European Union*. Leuven: Peeters
- Ferrari, S. (2005) 'The secularity of the state and the shaping of Muslim representative organizations in Western Europe' in Cesari, J. and McLoughlin, S.(eds) *European Muslims and the secular state*. Hampshire: Ashgate
- Fetzer, J.S. and Soper, C.J. (2005) *Muslims and the State in Britain, France, and Germany*. Cambridge: Cambridge University Press.
- Frégosi, F., ed. 1998. *La Formation des cadres religieux musulmans en France: approches socio-juridiques*. Paris: L'Harmattan.
- Frégosi, F. (2001) "'Droit de cité" de l'islam et politiques municipales: analyse comparée entre Strasbourg et Mulhouse' in Frégosi, F. and Willaime, J.-P.(eds) *Le religieux dans la commune. Les régulations locales du pluralisme religieux en France*. Genève: Labor et Fides
- Frégosi, F., ed. 2004. *Les conditions d'exercice du culte musulman en France: étude de cas à partir des lieux de culte et des carrés musulmans. Etude réalisée pour le FASILD*. Paris: FASILD.
- Frégosi, F. (2004) L'imam, le conférencier et le juriste: retour sur trois figures contemporaines du champ religieux islamique en France *Archives de sciences sociales des religions* (125):131-146.
- Galembert, C.d. (2005) The City's 'Nod of Approval' for the Mantes-la-Jolie Mosque Project: Mistaken Traces of Recognition *Journal of Ethnic and Migration Studies* 31 (6):1141-1159.
- Kastoryano, R. (2006) 'French secularism and Islam: France's headscarf affair' in Modood, T., Triandafyllidou, A. and Zapata-Barrero, R.(eds) *Multiculturalism, Muslims and Citizenship. A European Approach*. London/New York: Routledge.57-69.

- Koenig, M. (2005) Incorporating Muslim migrants in Western nation states. A comparison of the United Kingdom, France, and Germany *Journal of International Migration and Integration* 6 (2):219-234.
- Koenig, M. (2007) Europeanising the governance of religious diversity. An institutionalist account of Muslim struggles for public recognition (forthcoming) *Journal of Ethnic and Migration Studies*.
- Maussen, M. (2004) Policy Discourses on Mosques in the Netherlands 1980-2002: Contested Constructions *Ethical Theory and Moral Practice* 7 (2):147-162.
- Maussen, M. (2005) Mosques and Muslims in Marseilles *ISIM Review* (16):54-55.
- Maussen, M. (2006) *Ruimte voor de islam? Stedelijk beleid, voorzieningen, organisaties*. [Space for Islam? Urban policy, facilities and Muslim organizations] Apeldoorn/Antwerpen: Het Spinhuis.
- Maussen, M. (2007) Islamic presence and mosque establishment in France: Colonialism, arrangements for guest workers and citizenship (forthcoming) *Journal of Ethnic and Migration Studies*.
- Merry, M.S. and Driessen, G. (2005) Islamic schools in three western countries: policy and procedure *Comparative Education* 41 (4):411-432.
- Monsma, S.V. and Soper, C.J. (1997) *The Challenge of Pluralism: Church and state in Five Democracies*. New York: Rowman&Littlefield.
- Peter, F. (2003) Training Imams and the Future of Islam in France *ISIM Newsletter* (13):20-21.
- Peter, F. 2004. Crisis of Laïcité and Reformist Discourses in France. The case of Muslim Debates on Citizenship. Paper presented at the Institute for the Study of Islam in the Modern World (ISIM), Leiden September 2004.
- Peter, F. (2006) Leading the community of the middle way: A study of the Muslim field in France *The Muslim World* 96:707-736.
- Peter, F. (2006) Une religion civile en quête d'autorités religieuses *Confluences Méditerranée* (57):69-81.
- Shadid, W.A., ed. 2006. *Islam and educational policy in the Netherlands*. Vol. 38, *European Education*. New York: Armonk.