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9.1. Introduction

There is a continuing debate in the literature on the governance of Muslim presence in Western Europe. An important issue in this debate is whether the overall trend is toward convergence of public policies, or whether country-specific regimes continue to generate divergent paths of integration and accommodation.⁶³⁵ Because of their citizenship regimes, West European societies are under institutional and normative pressure to respect religious diversity and grant equal rights to Muslim communities, also with regard to the creation of the houses of worship they deem appropriate. However, this general kind of convergence does not signify that French and Dutch governments are adopting similar policy responses. Policies of accommodation continue to be stamped by country-specific regimes of governance and increasingly the relevant question has become, not so much whether governments accommodate Muslim demands for recognition, but *which demands* are accommodated, *in what ways* and *for what reasons*.

Answering these questions requires a type of analysis that focuses upon the substance and underlying motivations of policies, and that is sensitive to changes over time. The taken-for-granted images of French and Dutch public policies with regard to Islam are too much based on extrapolations from events and policy approaches that in actual fact were typical for particular periods. For example, the hostile approach of French governments to the building of mosques in the 1980s and early 1990s does not illustrate that because of the principle of *laïcité* “France” is unwilling to accommodate Muslim religious practices. Over the past decade French governments have been more forthcoming in making a place for neighbourhood Islam. In order to more accurately analyse what governments actually do this study has mapped out in a historical perspective a wide range of different ways of thinking about, representing, designing, building and accommodating mosques. The empirical trends and patterns of French and Dutch public policies of accommodation of mosques in the 20th and 21st century will be discussed in a comparative perspective in this concluding chapter.

Institutionalised regimes of governance and the dynamics of public policy processes can explain the emergence of distinctive government responses. Institutionalised regimes are internally plural and subject to important transformations over time. The French regime comprises Gallican and Concordatarian traditions and contrasting interpretations of *laïcité*. Dutch church-state relations have been stamped by the experience of pillarisation but they should not be equated with this particular social configuration that once characterised the way Dutch society was coping with denominational diversity. Dutch church-state traditions are also marked by an ongoing debate between advocates of secular-liberal and pluralist interpretations of religious freedom and separation of church and state.

635. See Ferrari 2002; Koenig 2003, 2005 and 2007; Koopmans et al. 2005; Klausen 2005; Laurence and Vaisse 2006; Fetzer and Soper 2007; and Bader 2007b.

Most of the literature on Islam in Europe has almost exclusively sought to explain policy responses in light of institutional repertoires of citizenship and nationhood. However, for most of the 20th century policies of accommodation of Muslim immigrant populations were being shaped by colonial and guest workers regimes. The differences between these regimes of incorporation of immigrant minorities can explain the emergence of very dissimilar approaches and responses to Muslim presence in France and the Netherlands in different periods. Moreover, the historical development of the accommodation of Muslim populations created possibilities for patterns of governance that had emerged to then continue shaping public policies in subsequent periods. However, it has also become clear that French colonial history has mattered far more for post-war policies in France, than Dutch colonial history has done for policy responses in the Netherlands. French colonial policies were extremely well institutionalised, the principle of secularism was consistently sidelined in the governance of Islam and, for historical reasons, there existed powerful mechanism of diffusion that allowed the colonial legacy to continue shaping French public policies in the post-war period.

The crucial connecting point between institutionalised regimes of governance and policy responses are public policy discussions. Institutional repertoires structure policy discourses, but simultaneously institutional arrangements *are made to be relevant* within these public policy discussions. When building mosques in France was represented as about creating a “French Islam” the principle of *laïcité* was taken to imply a strict policy of non-financing. When, however, the issue was framed as about creating more equal conditions for “vicinity of Islam” municipal governments became far more forthcoming and other elements of French church-state traditions were pushed to the fore. Other institutional arrangements can also exercise a great influence on the formation of public policy approaches. The ways urban renewal policy discourses began structuring the issue-field of mosque creation in Rotterdam in the late 1980s was exemplary. Policy approaches and their respective images and vocabularies also create their own path dependencies. If a particular framing of mosque creation gains in plausibility and legitimacy it can structure the representations and thus propel policy responses down a particular path.

Institutional theories and discourse-oriented perspectives on the policy process can explain why particular configurations of public policy responses emerged in different periods and in different countries and cities. In this study a heuristic model has been used that distinguished between different levels of structuration of public policies. A first level comprises country-specific regimes of government. A second level was that of governing strategies and policy discourses. At this level particular features of wider institutional arrangements come to be of direct relevance for emerging policy proposals and strategies of accommodation of Islam and mosques. The third level is that of interactions and public policy discussions. Following these levels of structuration I elaborate on the main comparative observations and theoretical conclusions in the remainder of this chapter.

9.2. A comparative perspective on colonial and guest workers regimes in France and the Netherlands: the governance Islam and the accommodation of mosques

9.2.1. Colonialism

It remains risky to in any meaningful way summarize French and Dutch colonial strategies of governance of Islam, given that both countries “ruled millions of people through hundreds of policies in dozens of regions over centuries of history” (Bleich 2005: 173). Broader underlying strategies nevertheless can be identified. The governance of Islam in the French African colonies was organised around normatively meaningful distinctions between different forms of Islam. The French positively evaluated an Islam that was only a religious belief and Muslims that took over Western life styles. By contrast, “bad Islam” was associated with Arab fanaticism and with anti-colonial resistance and was seen as fundamentally in tension with European modernity. One governing strategy consisted of sponsorship of “good Islam”, by co-opting Muslim leaders who were willing to support French rule, sporadically financing some religious institutions (especially in Algeria) and showing respect for ordinary Muslim worship. A second strategy was the shielding of those forms of Islam that were seen as more syncretic and liberal, such as *l’islam noir*, and favouring those ethnic groups that were seen as only superficially religious, such as the Kabyle. Finally, the French developed comprehensive strategies to survey and control religious orders that might constitute a risk to the colonial status quo. Another crucial characteristic of French colonialism was the formation of elaborate institutional arrangements to accommodate workers and soldiers from the colonies in France. These arrangements for colonial immigrants were erected parallel to the arrangements to accommodate European immigrant workers. However, they functioned in very different ways. North Africans especially were segregated from the French population and from European immigrant communities, they were subject to constant surveillance and taken care of by institutions that were specialised in “native management” (*encadrement*).

The Dutch often claimed that their colonial governance of a society that was ethnically and religiously as complex as the East Indies was successful because it was based on profound knowledge and discretion. The advisory role of Snouck Hurgronje served to illustrate that public policies with regard to the Muslim population were also grounded in scholarship. Indeed, Snouck Hurgronje’s ideas about the need to be vigilant with regard to “Islam as politics” and simultaneously to respect regular Islamic practice, such as worship, the pilgrimage and Islamic law, became progressively more important for Dutch policies in the wake of the Aceh War and in the early 20th century. The Dutch sought to abstain from becoming involved in the direct regulation of “Islam as worship”. Another governing strategy, that existed in tension with this principle of neutrality, was to favour the hybridised cultural communities and to shield local forms of Islam, for example on Java, from purification under the influence of reformist movements. Interestingly this strategy of shielding a syncretic form of Islam resembled French colonial policy in West Africa.

French institutional church-state relations shaped colonial strategies of government of Islam in Algeria and West Africa, but it was not the tradition of strict secularism that was of crucial importance. Instead, the Gallican and Concordatarian traditions of state control over organised

religions (*le culte*) and support for officially recognised religious institutions were leading. In Algeria an official Islam was created with institutions and religious personnel that were remunerated by that state. Not only were Algerians Muslims excluded from equal citizenship, the principle of *laïcité* that was constantly celebrated as among the defining characteristics of French modernity, was consistently side-lined when it came to the governance of Islam. Importantly, through the creation of the Paris Mosque in 1926 and the co-optation of Abenkader Ben Ghabrit, an important institutional linkage was created between the government of Islam in Algeria and policies of accommodation in France. The significance thereof became clear, for example, when the rector of the Paris Mosque and the French government joined hands and succeeded in frustrating the construction of an “independent mosque” in Marseilles in 1937 and 1951.

Because the administration of Islam in the Dutch East Indies was far less institutionalised and developed there were also less attempts to systematically draw upon Dutch church-state traditions for the governance of Islam. The principle of neutrality was laid down in the instructions to the governor general of 1803, but the fact that colonial rulers abstained from all too directly mingling in religious affairs and tried to restrain overzealous missionaries, was not so much grounded in Dutch church-state traditions, but rather a result of strategic considerations and the fear that economic interests might be jeopardized. The principle of government neutrality was also cancelled out by attempts to obstruct the engagement of Islam in the political realm. Foundational ideas of “pillarisation” played only a minor role and superficial resemblances of the “group approach” in Dutch governance of pluralism should not be taken to imply substantial similarities. First of all, there was no genuine form of equal treatment because the entire colonial system was based upon strategies of exploitation and the idea of European cultural superiority. The idea that the populations of the East Indies were in need of Dutch “trusteeship” prevented the model of “association” from converting into a system of government based on more equal respect of indigenous religions and culture. In addition, whereas political representation of the different religious denominations was central to the pillarised model in the Netherlands, it was seen as deeply troublesome in the case of Islam.

9.2.2. Guest workers

There are important structural similarities between French and Dutch arrangements to accommodate guest workers. These institutional arrangements were organised around the impermanent presence of single male men whose main goal was to collect revenues to bring home. Institutions were developed to “reproduce the immigrant labour force”, by regulating immigration and rotation of foreign workers, and making available food, a bed, medical care and some distraction. However, when attention is paid to the ways arrangements for Muslim guest workers – North and West Africans in France, and Turks and North Africans in the Netherlands – functioned, important differences become visible. In France guest workers from the former African colonies, were handled in a very different way compared to their European counterparts. Institutions such as the newly set up immigration services and the SONACOTRA hostels continued to function in the same way as they had in the colonial regime. The kind of expertise that was vital to “native management” (*encadrement*) continued to be seen as relevant in dealing with the Muslim guest workers. The people who had this expertise – such as the veterans and administrators who had returned from Algeria – were readily re-employed in institutions set up to accommodate these immigrants. In the Netherlands, by contrast, the creation of institutional arrangements for guest

workers did not draw upon a colonial legacy but was inspired upon the arrangements that were developed in the sector of social work and notably in the governance of “maladjusted families”. These institutional arrangements could become likened by assuming that single male foreign workers risked the same kind of “disorientation” as the clients of social workers. Only “careful guidance” could help prevent the spread of alcoholism, laziness and misbehaviour among immigrants forced to live temporarily in an “unfamiliar environment”. In the Netherlands there was no institutional differentiation between the accommodation of Southern European, and North-African and Turkish guest workers.

Despite these differences French and Dutch policies converged around the idea that it was wise to offer labour immigrants a “cultural environment”. This would smoothen the hardships of the temporary stay in a foreign country and guarantee that immigrant workers would not forget that they were only abroad for the short term. When religious needs and demands appeared these were addressed in a similar improvised manner. At first Catholic masses were organised for Italian and Spanish workers, and later some premises were made available for Muslim prayer. Interestingly, in both countries more elaborate plans were developed to provide for the cultural and religious needs of Muslims when the guest workers regime was on its last legs, namely in the second half of the 1970s. It was at that point that in the Netherlands a national subsidy scheme for the refurbishment of houses of worship for “Mediterranean Muslims” was set up in 1976, and continued until 1983. In France an elaborate policy plan was presented that would provide support for the religious and cultural needs of foreign workers. A few years later all hostels for foreign workers were equipped with a prayer facility.

Particular historical circumstances need to be taken into account to understand why this happened so late. Throughout the 1970s foreign workers had become better organised and were better able to make themselves heard, and among their demands was to have their religious needs provided for. Governments also assumed that by supporting the possibilities of guest workers to retain their cultural and religious practices they could sustain the belief in return. Finally, the closing years of guest workers policies also witnessed the emergence of solidarity movements questioning the exploitation of the “migrating labourers”. In discussions on the creation of cultural and religious institutions in the late 1970s there existed a mixture of ideas about improving the living conditions of temporary guest workers and about setting up permanent institutions to accommodate the new forms of religious and ethnic diversity. Discussions around early mosque building projects in Almelo (1975), Rotterdam (1979), Mantes-la-Jolie (1979) and Marseilles (1982) were illustrative of this mixing of policy frames.

In France and the Netherlands the presence of guest workers and their needs were not primarily framed as related to religion. This approach was also plausible because many single male workers had (initially) put their religion “on hold” during their stay abroad. Religious practices were commonly subsumed under the heading of all kinds of “cultural needs”, which sidelined the idea that church-state relations were crucial for governing practices. More generally, both immigrant workers and the host society perceived cultural needs as secondary to other issues, such as employment, wages, medical care and lodging. Policy responses remained fragmentary. In the Netherlands the Foundations for Foreign Workers were officially not supposed to provide for religious needs, but they often did so nonetheless, usually in an improvised way. The moment (municipal) governments became convinced that labour immigrants were settling permanently, however, they took a more principled stance. Thus the Rotterdam municipality laid down in policy in 1978 that Muslims should understand that in the Netherlands the state carried no responsibility for the financing of religion. In France there were also few incentives to specifically

draw upon colonial religious policies of governance of *Islam*. Responses were developed on an *ad hoc* basis. There was also little opportunity for institutional diffusion because the status of the crucial institution bridging the colonial and guest workers regimes in the domain of religion and Islam – the Paris Mosque – was unclear. It was undecided whether its ownership belonged to the Algerian or French government, it catered primarily to *harkis* living in the Paris region, and in the early 1970s newly emerging organisations of Algerian Muslims openly criticised the rector and even called the institute in Paris “the last bastion of *l’Algérie française*”.

9.3. Citizenship, public policies and the construction of mosques in France and the Netherlands: patterns and explanations

Since the 1980s strategies of governance of Islam, immigrant integration policies and policy responses to mosque creation in France and the Netherlands were formed dialectically between national and local levels of administration. In France the crucial guiding idea shaping policies of accommodation was the need for an “Islam of France”. In the late 1980s the idea arose that in each major French city a central Grand Mosque could be built. Throughout the 1990s, successive French governments tried, but ultimately failed, to impose the Mosque of Paris as the principal institute for “Islam of France”. Adequate opportunities for Islamic worship continued to be lacking and the development of Islam at a grassroots level was largely disconnected from public policy agendas. The process of Consultation on Islam of France would, however, open a new phase in French accommodation policies. The issue of mosque creation re-appeared prominently on national and municipal policy agendas. The municipality of Marseilles began a series of hearings focussed on creating a central mosque that would be administrated by a council of local Muslim representatives. However, these plans seemed to end in a deadlock in 2004 and the municipality then connected on to an idea that had come up elsewhere, namely to focus upon improving the housing conditions of “vicinity Islam”. In 2006 events took yet another turn when the municipal government opted for a dual strategy of facilitating the building of a large Islamic cultural and religious centre to represent “Islam of France” and simultaneously to create opportunities for the erection and renovation of a number of more adequate “neighbourhood mosques” catering to the needs of Muslims living in the different districts of the city.

In the Netherlands an important issue on the national policy agenda in the 1980s was whether a special regulation would be made to finance the improvement of immigrants’ houses of worship. Intense discussions finally resulted in the political decision to abstain from such a subsidy scheme. The national government since the early 1990s took a “hands-off” approach to the issue, leaving the accommodation of mosques to municipal governments. In Rotterdam early attempts to support and subsidise mosque associations as important immigrant self-help organisations were met with increasing opposition in the second half of the 1980s. Confronted with growing tensions between Dutch residents associations and mosque associations, and with disagreements within the municipal bureaucracy, a window of opportunity presented itself when the idea came up to think about “mosque integration at the neighbourhood level”. A special policy for the housing of mosques was developed between 1988 and 1991 that embedded the issue of mosque creation within urban renewal policies and town planning practices. During the implementation of this policy in the 1990s it sometimes seemed as if the accommodation of Islamic

worship in Rotterdam mainly required coordinated attempts to provide sufficient parking spaces and create understanding for this “relatively new facility”. Another idea, that emerged in the mid 1990s, was to accommodate plans for a number of perceptible mosques as signifiers of the ethnic make-up of the city’s population. In 2002 policy makers celebrated what they believed to be the conclusion of a successful municipal policy of making a place for Islam in Rotterdam. However, political and public debate on immigrant integration and Islam in the Netherlands would quite unexpectedly take a sharp turn. One key focal point for the expression of discomfort about the development of Islam in the Netherlands were the so-called “nostalgia mosques” that were said to be too prominent and illustrative of the failure of immigrant integration.

9.3.1 Comparative observations

Both in France and the Netherlands the housing conditions of the small makeshift mosques came to be defined as “a problem” in the early and mid 1980s. However, public policy responses in Rotterdam and Marseilles rapidly began to diverge. In Rotterdam the municipality accepted the responsibility to help Muslims improve the situation of their houses of worship. In Marseilles, by contrast, the municipality focussed almost exclusively on the possible creation of a Grand Mosque. Only in the second half of the 1990s did some French cities begin to take a similar “pragmatic” approach, seeking to help improve the neighbourhood mosques. Still, this new approach was only adopted by the municipality of Marseilles in 2004.

Another issue on the agenda was whether or not the government should finance the building or refurbishment of mosques. In the Netherlands the national government took a principled decision in the early 1990s that there would be no direct financing of immigrants’ houses of worship. Municipal governments softened this principled stance, which prevented direct financial support for mosques, by being forthcoming in helping mosque associations in finding more adequate locations and premises. In France, the idea of the state directly financing the creation of mosques seemed unimaginable in the 1980s and early 1990s. In addition, many local governments, including the one in Marseilles, took a hostile approach and actively obstructed efforts of Muslims to create more adequate mosques. However, in the second half of the 1990s several cities began developing rather creative interpretations of the law and sometimes ended up financing the building of mosques. The national governments issued special directives in 2000 and 2005 spelling out the actual opportunities for direct and indirect financial support for the building of mosques. In 2006 the Machelon Commission even advocated a revision of the 1905 Law on the Separation of Churches and the State to allow for direct subsidies for houses of worship of immigrant minorities. These trends appear counterintuitive, especially in view of the image of the French secular model as preventing the state from financing religion.

If attention is focussed upon the policies of accommodation of the larger mosques there are again remarkable divergences. In France the overall image is now to think that in the future there will be a number of smaller and middle-sized “neighbourhood mosques”. However, the idea is also that there will be some Central Mosques and larger Islamic centres in the major cities that will function as institutional supports and symbols of “Islam of France”. In the Netherlands the predominant idea throughout the 1990s was that a natural process of emancipation would unfold, in which sufficiently numerous Muslim communities would seek to substitute their makeshift accommodation by larger and more perceptible mosques. However, the public perception of these larger mosques has changed quite dramatically. They are now often represented

as institutions that turn their back upon Dutch society. The future image of the incorporation of larger and new mosques in the Netherlands has become destabilised in the last 5 years or so, which has also created new opportunities for other images to emerge. There are now politicians and opinion makers who suggest that the “nostalgia mosques” should make way for mosques that are more “modern” and that look like and function as “polder-mosques”.

Another overall pattern in policies of accommodation of mosques relates to the ways municipal governments regulate the societal functions of mosques and Muslim associations. Again the stereotypical idea that French authorities would take a “hands-off” approach, whereas the Dutch would delegate state prerogatives to religious communities is belied by the actual policy responses (cf. Statham et al. 2005). The municipality of Marseilles has been eager to see an Islamic Cultural Centre emerge and it is willing to make substantial subsidies available for the building and the activities. In Rotterdam the enthusiasm for making mosque associations into players in the field of immigrant integration faded away in the late 1980s. Municipal authorities still tend to take an open stance when it comes to collaboration on a project basis with Muslim associations. However, it has become very clear that there are few opportunities for Dutch authorities to steer the development of Islam, and the Turkish Muslim organisations especially have successfully protected their associational autonomy vis-à-vis Dutch governments.

9.3.2. Level of structuration (1): internally plural, institutional regimes of government and the formation of public policies of accommodation of Islam

Church and state

French and Dutch church-state regimes are historical products, comprising different traditions and various principles that work together to create a distinctive national approach, but that also exist in tension with each other. The French regime combines state regulation of organised religion (*le culte*), reluctance to recognize communal group-representation in the political realm, with the idea that only a state that is itself strictly non-religious can treat individual citizens equally. Dutch institutional church-state relations are centred around the idea that religious and non-religious “philosophies of life” (*levensovertuigingen*) should be treated in an even-handed manner, that religious and denominational organisations are constitutive of an autonomous civil society, and that religious freedom means effective opportunity to practice and protection of religious associations from state intervention.

A second dimension of the internal plurality of regimes of government of religion is that they vary between institutional spheres and policy fields. Contrary to the stereotypical image, in France there are actually quite substantial opportunities for financial support for the costs of building and maintenance of houses of worship. In the Netherlands, by contrast, after some legal and political debate, the 1983 constitutional revision has come to be understood as meaning that the separation of church and state implies that there is no room for direct financing of houses of worship. In France ideologically loaded interpretations of *laïcité* are crucial in shaping policies in institutional domains that are closely associated with the identity of the state, such as public education and the judiciary. In the domain of institutional relations with organised religions, the Gallican tradition of state control over religion is strongly alive. With regard to more practical issues, however, it turns out that French authorities can be quite forthcoming in recognising religiously

motivated demands. This is one aspect of the dialectical relationship between institutions and discourses. Depending on the ways an issue is framed – for example the building of mosques or the practice of wearing a headscarf – different elements of church-state regimes come to the fore. In the Netherlands the principle of proportional representation in the public realm, a legacy of the period of pillarisation, is crucial for public policy in the sphere of education. However, with regard to issues such as Muslim spiritual care and the wearing of headscarves the guiding principle is even-handedness. In the particular case of the financing of houses of worship, the Dutch regimes primarily is assumed to mean “separation of church and state” and “no-financing of religion”.

A third dimension of the internal plurality of regimes of government of religion is related to the particular situation of Islam as compared to that of other religions. This dimension is especially associated with the history of colonialism. The French case is quite exceptional because of the ways distinctive intersections developed between colonial governance of Islam and church-state traditions. The Gallican and Concordatarian traditions remained crucial for the governance of Islam in Algeria and West Africa, while the 1905 Law on the Separation of Churches and the State was consistently sidelined. Since the colonial period, French Islam policy, especially in those domains where the symbolical, political or financial stakes are high, are made in networks linking the Ministry of the Interior, the Foreign Office, the National Security Services and governments in befriended Muslim countries. A crucial historical and institutional linkage in this network is the Paris Mosque. The continued “status aparte” attributed to Islam in French religious government is also the result of cultural mechanisms of diffusion. Ideas about the risk of Muslims uniting in opposition to French rule, the view of Islam as a “belligerent religion” and of secularism being a concept alien to Islam are a constant in colonial as well as in post-colonial times. These ideas are in themselves not that different from the guiding notions that informed Dutch colonial government of Islam. However, colonial legacies did not diffuse into the church-state traditions. The Dutch did not draw upon their colonial policies for the governance of Islam in Europe, neither in the colonial nor in the post-colonial period. In recent years, and especially since 9/11, there are indeed political voices in the Netherlands suggesting a distinctive status to Islam, setting it apart from other religions, but these are not a direct legacy of Dutch colonialism but have developed in relation to ongoing debates in Europe and the rest of the world.

This more complex and layered conceptualisation of church-state regimes allows for an explanation of some of the distinctive patterns of strategies of government of Islam and policy responses to mosque creation in France and the Netherlands. The idea of creating an “Islam of France” crucially informed French public policies of accommodation since the late 1980s. It coupled the re-invented Republican tradition together with *laïcité*. Islam was to be “domesticated” (Bowen 2004a) and to organise in a way that was post-ethnic, liberal and modelled by French traditions of administration of “*le culte*”. Distinct traditions shaped responses in different domains: in education upholding secularism became the key objective, but in organising the forming of Islamic representative bodies Gallican and colonial strategies were continued throughout the 1990s. The Paris Mosque was the only viable partner for “Islam of France”.

The effects of these strategies were different, but equally discouraging. In the domain of education, for example, a series of confrontations about the headscarf continued throughout the 1990s until the 2004 law, and arguably beyond. The idea of building “Cathedral Mosques” reproduced the Gallican tradition of organising religion in a top-down manner, but it also reproduced the colonial tradition of co-opting the “good Muslims” and using a beautiful mosque building as a “reward”. By linking the building of mosques to these issues of organising Islam of France it became not only a highly complex and sensitive policy issue, but the focus was also

steered away from the more practical concerns about the lack of adequate prayer space. In addition, and this was crucial, the more the issue became of symbolical importance the more the principle of *laïcité* and the fact that in France “the state does not finance religion” came to be of importance. Whereas in the colonial context, financial support had been the correlate of state influence and co-optation, the emphasis that was now put on *laïcité* prevented direct financing. This was an important factor that prevented this approach from producing much results.

The Consultation on Islam in France (1999-2003) quite fundamentally changed the overall strategies of governance of Islam. A number of practical concerns that mattered to Muslims were now being addressed. It was crucial that the experiences of French cities that had been able to help improve the housing conditions of “neighbourhood mosques” came to be picked up on the national policy agenda. Advocates of moderate secularism (*laïcité modéré*) emphasised that French authorities could be more forthcoming in helping Muslims provide for their needs, and they could underline that article 1 of the 1905 law stipulates that the French state “guarantees freedom of religion”.

Dutch church-state traditions have been transforming more fundamentally over the past decades, which is also demonstrated by the revision of the constitution in 1983. In some domains principles of proportionality and even-handedness continue to inform policy responses with regard to Islamic presence. This was the case with regard to equal rights for Islam in spheres such as education, spiritual care and religious practices such as ritual slaughtering. The relatively rapid regulation of these issues in the 1980s has probably earned the Dutch the reputation for being forthcoming in the accommodation of Muslim demands for recognition. However, there was never any strategy of stimulating the forming of an Islamic pillar. With regard to the creation of houses of worship the regime-shift marked by the constitutional revision of 1983 had profound consequences. In the 1980s there were good grounds to argue that in light of Dutch church-state traditions immigrant minorities needed to be compensated for “historical inequalities” and that a subsidy scheme was fair. The fact that this did not happen was not a direct result of the text of the new constitution. As the Hirsch-Ballin State Committee argued, there was no principled constitutional obstacle preventing subsidies allowing immigrant minorities to catch up. However, a more sharp polarisation between Christian-Democrats and liberal-secular political parties resulted in a more principled political stance of the latter that suggested that equal treatment and the separation of church and state meant that there could be “no financing of religion”. When it came to the building of mosques the Dutch church-state regime was focused in the early 1990s around the principle of “separation” and “no-financing”. However, the fact that national and municipal governments constantly recited this principle did not mean they would therefore take a strictly “hands-off” or even a hostile approach to the issue of mosque creation. Quite the contrary. Municipalities, including but not only, Rotterdam, actually were encouraged to develop other approaches to address the unacceptable situation of housing of Islamic worship. The lack of direct financial support was thus softened, if not compensated, by more forthcoming municipal approach and by using indirect ways of financial support, notably via urban renewal funds and subsidies for socio-cultural activities.

Citizenship regimes and integration policies

Citizenship regimes are organised around democratic principles such as equality and freedom, which means that the forms of exclusion and hierarchy that characterised the incorporation of Muslim population in colonial and guest workers regimes could not be continued. Since the

early 1980s, French and Dutch strategies of accommodation policies, at least to some extent, were guided by democratic principles. I focus on the ways national and local integration policies have shaped strategies of governance of Islam and of the incorporation of mosques.

In the mid 1980s an extremely powerful discourse about the French model of *intégration* was re-invented. It was organised around the notion of Republican citizenship, discursively opposed to “Anglo-Saxon multiculturalism” and represented as a direct continuation of the political model invented with the French Revolution. The discursive strength of this framing remains remarkable. It has guided not only the policy process but the entire understanding of immigrant integration issues in French public debate. The only way for “ethnic elites” – the term in itself obviously exists in tension with this discourse – to speak with influence in France is by phrasing their demands in the terms of Republican discourse. It has informed strategies to make Islamic institutions and Muslim religious beliefs more “French”. This refers not only to the earlier-discussed modelling of Islam by French church-state traditions, but also to the need for Islam to be shaped by French language, French architecture and “French values” such as “*un esprit critique*”, scholarship, modernity and gender equality. In this sense the colonial idea of creating an “*Islam fabriqué par nous*” is not that far away.

The re-invention of the Republican tradition in the late 1980s also directed attention away from other aspects of French history. It happened to be, however, that these other aspects – such as colonialism and racism – had been crucial in shaping the actual social situation of the Muslim population that was living in France. Their social exclusion and continued discrimination obviously existed in tension with the political ideals underlying the discourses of *intégration*. In addition, the relatively abstract discourses on integration gave little guidance to actors trying to address societal problems on the ground. The intense struggles that opposed the extreme right Front National and the anti-racist movements since the late 1980s contributed their share in letting “*la lutte des symboles*” take priority over practical approaches of addressing social problems related to immigration. Partly as a result, the actual process of formation of Islamic institutions and the emancipation of immigrant newcomers developed relatively autonomously from (national) policy practice.

The particular history and context of Marseilles has also left a strong imprint on understandings and policy responses to the incorporation of Islam in the city. The so-called “Marseilles model” served as a reference point with regard to a local tradition of religious pluralism and to the idea that traditionally immigrant communities had been able to integrate into local society on the basis of their religious institutions. On the other hand, there was also the image of the Mediterranean city, characterised by a hybrid culture, a tradition of local autonomy and an atmosphere of open-mindedness and typical Mediterranean disorderliness. Bringing in the Mediterranean identity when discussing the incorporation of Islam served at various moments to bridge the colonial past and the immigration present. Marseilles could be situated in a transnational and regional perspective that linked it to North Africa and in that perspective Islam was no longer a “foreign threat”. This image of Marseilles has grown in prominence since the second half of the 1990s. It was linked to the idea of Marseilles being a positive exception in France, better able to integrate immigrants and thereby avoiding the violent clashes that were witnessed in other French cities. However, also with regard to these local narratives it should be kept in mind that they tend to hide as much as they supposedly reveal about the history of the city. When the Muslim community was called upon to “invent itself” in the late 1980s and when the Director of the Mayor’s Cabinet in 2002 raised the question whether the “Muslims were sufficiently mature to know what they wanted”, the actual history of exclusion of the North

African immigrants was obscured. Indeed the patterns of integration of the Muslim population diverted in significant ways from those of other immigrant communities, but far from being a result of the inability of Muslims to constitute themselves as “a community” this was due to a long history of “native management” and enforced segregation that had been crucial for French governance in colonial and guest workers regimes.

Whereas French immigrant integration discourse is characterised by a rhetorical consistency, the Dutch integration debate has been marked by a number of crucial shifts and changes of policy paradigms. Three major phases in integration discourse and the development of policy paradigms can be distinguished that each structured particular policies of accommodation of Islam. A policy paradigm centred around Ethnic Minorities Policies was set up in the early 1980s. Even though it was primarily guided by the idea of combating disadvantages and preventing the formation of socially-excluded minority groups, it also comprised a kind of multiculturalism. The idea was that immigrant communities should have equal rights and opportunities in the spheres of religion and culture, and that ethnic self-help organisations could fulfil both a cushioning and an emancipating function in the integration process. The way this view was summarised as about “integration with retention of identity” would have profound effects. This slogan had previously figured within the guest workers regime, and it had guided policy efforts to accommodate (impermanent) Moluccan immigrants by guaranteeing community cohesion. It was now being diffused into immigrant integration policy discourses. Importantly, emerging ethnic elites, and most of all the Turkish Muslims, wholeheartedly embrace the idea of integrating while retaining their ethnic and religious identity. They would use it as a major device to justify the strategy of ethnic community building they pursued throughout the 1980s and 1990s.

There was a discursive affinity between the legal and cultural legacies of pillarisation and Ethnic Minorities Policy. They converged around the idea that sometimes a phase of in-group bonding and collective emancipation preceded individuals integrating into the wider institutions of society. There was never any kind of policy to stimulate the development of an “Islamic pillar”. Nevertheless, the combination of, on the one hand, support and subsidies for ethnic self-help organisations, the critique of the concept of assimilation and the constant underlining of the right to “retention of identity”, and, on the other hand, attempts to grant Muslims equal rights and incorporate Islam into Dutch church-state traditions, ended up facilitating if not stimulating a process of ethnic institutionalisation of Islam. This process has in retrospect been criticised as allowing for the formation of Islamic institutions that are insufficiently adapted to the Dutch context and that too much turned inwards. Policy makers in Rotterdam had already lost their enthusiasm about integration with retention of identity in the late 1980s, but their feeble efforts to oblige Muslim associations to organise their educational and social activities in municipal community centres because this was better for “integration”, failed repeatedly. It showed that the combination of discursive and institutional opportunities had set off a process of emancipation of Islam that now followed largely its own trajectory. Instead of seeing here a deliberate policy strategy of group-based integration, it is better to understand the outcomes as a result of agency of ethnic elites, unintended consequences and a lack of political will and institutional means in the 1980s and 1990s to effectively steer the process in another direction.

A second phase in Dutch strategies of governance of immigrant integration developed in the 1990s. At the national level the overall emphasis was on further combating socio-cultural and economic disadvantages, focussing on individual emancipation and enforcing “civic integration” (*inburgering*). Studies that focus on these trends in national integration policy discourses have overlooked another shift in integration policies in the 1990s, which was the turn

towards “diversity policies”. In domains of culture and identity this policy paradigm focussed on the more folkloric aspects of ethnicity and represented cultural diversity as a matter of different life-styles. These ideas were rather vague and elitist, but they translated into a strong moral call upon Dutch residents not to be racist and “embrace differences”. It did not directly shape many policies of accommodation of Islam, but it helped sustain the optimism about the integration of second generation immigrants in the Netherlands. Researchers and policy makers in the mid 1990s constantly celebrated the “Islam of the young” and they converged in believing that the strategies of self-segregation that were pursued by first generation ethnic elites (“the fathers”) were already being undermined from within because of the influence of younger generations within Muslim organisations. On the other hand, the emphasis that successful integration required open-mindedness of the Dutch smothered the expression of many forms of discomfort and anxiety in the centres the policy process. This would pave the way for the drastic turn in immigrant integration discussions in the early 21st century.

A third phase in the articulation of ideas about national identity and immigrant integration was set off by an essay that helped to give a name to all kinds of worries and discomforts. Scheffer’s article on the “multicultural tragedy” was followed by years of public and political debate on the failure of Dutch approaches to immigrant integration. The new turn in discussions put Islam and the problematic integration of Muslims at the heart of policy discussions. Because Rotterdam became the home-base of the Fortuyn revolt and because the populist party Liveable Rotterdam participated in a coalition government between 2002 and 2006, the new belief in assimilationist had important repercussion municipal policy discourses with regard to Islam and the building of mosques. However, the actual impact of these shifts in discourse upon concrete policy measures that were being executed remains difficult to establish. The plans to halt the building of new mosques in a “deviating style”, for example, were never executed.

9.3.3. Level of structuration (2): strategies of governance and policy frames

A second level of structuration of public policy responses is that of strategies of governance and policy discourses. Configurations of strategies of accommodation of mosques can help to distinguish between periods. In Marseilles four main strategies of governance of Islam and mosque creation can be distinguished. In the late 1980s the wider idea of creating an “Islam of France” was linked to the idea of incorporating the Muslim community into the local tradition of religious and community based pluralism. The building of a central, Cathedral mosque was seen as a way of addressing the problematic housing situation of Islam, but also as a way of constituting a genuine Muslim community with appropriate institutions. The particular understanding of mosque creation emphasised institutional and symbolic issues more than practical ones, and importantly it resulted in the mobilisation of institutional repertoires indebted to, on the one hand, the colonial and Gallican traditions of governance of Islam and, on the other, the strict interpretations of Republicanism and *laïcité*. A second strategy of governance was introduced by the conservative municipal government led by Jean-Claude Gaudin that came to power in 1995. It combined a superficial recognition of privileged Muslim interlocutors with an attitude of outspoken hostility to further recognition of Muslim demands and opposition to the building of symbols of Islamic presence. This was basically a strategy of marginalizing of the Muslim population, set in the context of other attempts to transform Marseilles into a middle-class city and being tough on the immigrant population. In the early 21st century, a new reorientation

of strategies occurred in the context of growing political power of immigrant elites and the Consultation of Islam of France. Renewed attempts to actually create an “Islam of France” were now linked to the idea of distinctively local traditions of managing cultural diversity. A new perspective was created around the building of a large Islamic centre that would be sponsored in part by the municipality and that would stand as a symbol of recognition. Underneath the surface, however, ongoing differences about the development of this Islam of France continued. The introduction of the new strategy of governance in other French cities to improve the housing conditions of “neighbourhood mosques” and its corresponding framing of the need to accommodate a regular and serene form of “vicinity Islam” came as a *deus ex machina*. It opened up possibilities for a more pragmatic take on the matter and justified a more forthcoming approach of the municipal authorities. Even though it seemed that the focus on “neighbourhood Islam” would come at the costs of the more ambitious plans for a central institute of “French Islam”, in the end a window of opportunity presented itself after the elections of the Regional Muslim Council when the power balance in this council shifted towards the more “liberal” factions associated with the Paris Mosque. The governance of Islam and mosques in Marseilles then seemed to enter into a period of problem closure with simultaneous attempts to improve the conditions for the various ethnic and denominational Muslim communities in the city district and ambitious plans for a major Islamic centre to stand for “Islam of France”.

In Rotterdam, initially municipal officials set out to accommodate Muslim associations and mosques within the field of Ethnic Minorities Policies. Discussions on the role that mosque associations fulfilled brought to light political tensions and normative disagreements that were concealed by everyone reciting that there was a need for “integration with retention of identity”. However, parallel to this approach another policy framing was being developed that avoided church-state traditions and immigrant integration policies, and instead approached the issue of mosque creation as about urban and social renewal and town planning. An underlying promise was that better spatial accommodation would smoothen the process of further integration of immigrant communities in the neighbourhood. A coherent and comprehensive strategy of governance was developed and implemented that concentrated on the incorporation of mosques as regular “neighbourhood facilities”. This approach sidelined many of the more contentious issues and seemingly allowed for a progressive normalisation of discussions and approaches. It was institutionalised and implemented throughout the 1990s. In the mid 1990s, almost without being noticed, another strategy was being introduced in view of the legitimising the building of larger purpose-built mosques. This strategy mobilised the fashionable “diversity talk” and suggested understanding mosque building as about embracing diversity. In 2002 policy makers announced they had succeeded in bringing the regulation of mosques to an end. Ironically a new and extremely contentious discussion would almost immediately start, in which immigrant integration was again the major motive to think critically about the building of mosques in the city. However, subsequent attempts by Liveable Rotterdam to translate a political strategy that was aimed at restricting the prominence of Islam in Rotterdam into policy met with political protest. A policy that singled out Muslims and restricted the opportunities for the building of mosques also existed in tension with the Dutch legal framework. This showed that overzealous populist politicians who had argued that “legal reality” was less important than “social reality” had failed to capture the significance of the institutional constraints within which they had to operate.

9.3.4. Level of structuration (3): interactions and public policy discussions

Public policy responses to mosque creation are shaped by institutionalised regimes and strategies of governance, but structuration does not mean that institutional arrangements “determine” outcomes. The policy process is also directed by the dynamics of political contestation and by more idiosyncratic and circumstantial factors. Some factors or “events” are truly circumstantial, meaning that it is easily imaginable that policy outcomes would have been different if they had not “occurred”. Often times, however, what appear to be circumstantial factors are actually only of consequence because of various forms of human action. Crucial events only become “crucial” by being represented and framed as crucial, and consequently they can become experienced as such. The headscarf affair of 1989 had considerable impact on public policy discourses on Islam in France, but this was not because two girls decided one day to show up at school wearing a headscarf, but precisely because it became an “affair” seen as emblematic of the confrontation between “Islam” and “French values”. Similarly, it would be hard to overestimate the effects of 9/11 for discussions on Islam in Europe. Politicians at first desperately tried to argue that the terrorist attacks in the United States were “completely unrelated” to the development of Islam in France and the Netherlands, but they obviously failed. In the Netherlands the broader trend of public opinion becoming more and more dissatisfied with integration policies, could be associated with wider developments of Islam in Europe and beyond. The brutal assassination of Theo van Gogh and the death threats against Ayaan Hirsi Ali were dramatic events in themselves, but the great impact they had on Dutch discussion on Islam was also due to the fact that they could be linked easily to ongoing debates about failed integration, political naivety, Islamic radicalism and international terrorism.

A second factor that can explain why institutional frameworks do not in a clean or straightforward way determine policy outcomes is related to the importance of practices of interpretation, representation and argumentation at various stages of the policy process. This study has shown how far institutions and legal and constitutional frameworks can bend under the weight of interpretation. The diverging paths that interpretations and discussions take can sometimes explain the simultaneous formation of different outcomes within a similar institutional setting, leading to different accommodation policies in different municipalities for example. Sometimes these struggles about meaning concern crucial aspects of institutional frameworks and are played out on the centre stages of political debate. The storm of protest following the presentation of the Machelon report in 2006 was an illustration thereof. Ongoing deliberations on the significance of principles that are seen as foundational, such as the separation of church and state, the principle of equal treatment and religious freedom, have over the past years gained in importance in public policy discussions on the accommodation of Islam. This study may help in shedding some light on the ways these discussions unfold and to what consequences, and contribute to the capability of policy makers to reflect upon the cultural and institutional frameworks in which their actions are embedded and help them proceed in making balanced and contextual judgements (cf. Maussen 2006: 3ff.).

A third aspect of the ways interactions and discussions shape policy outcomes is the formation of discourse coalitions. These coalitions around metaphoric understandings sometimes enabled actors to pursue common courses of actions and to agree on problem definitions, even if they continued to have diverging normative orientations, conflicting interests and incongruent empirical understandings. Discourse coalitions at times introduced novel understandings and stimulated the forming of unexpected alliances in situations that were characterised by misunderstanding or

antagonism. Whether or not this kinds of coalitions in discourse helped solving public problems and gave a positive turn to the policy process depended on various factors. For example, Dutch policy makers and emerging ethnic elites formed a discourse coalition in the late 1980s by constantly stating that it was important that there would be “integration with retention of identity”. However, this appearance of agreement prevented many underlying divergences between normative models of immigrant integration to be more openly discussed. Similarly, the ways a broad coalition of meaning emerged around the idea that “there should be a mosque in Marseilles” helped in re-introducing the issue of recognition of Islam onto the municipal agenda in the early 21st century, but translating this general ambition into a concrete policy response proved to be rather difficult. The suggestion of agreement obscured rather than solved underlying disagreements about the organisation and development of Islam in France. At other times, by contrast, the forming of discourse coalitions has been a crucial moment in the formation of public policy responses. This was the case notably when municipal officials, Dutch residents associations and representatives of mosque associations in Rotterdam developed a common perspective and could agree that what mattered was the creation of adequate “facilities” providing for the needs of the immigrant population in the city districts. They could share the hope that the spatial integration of mosques could pave the way for the more general integration of the Muslim population in the city. A similar understanding developed in France in the second half of the 1990s. Quite suddenly the idea of creating a place for “*Islam de proximité*” seemed a way of addressing a wide variety of different concerns felt by politicians, representatives of Muslim associations and non-Muslim French residents. The erection of houses of worship that were “tailor made” (*sur mesure*), the idea of mosque associations functioning as autonomous “parishes” and acting as ordinary “neighbourhood associations” now carried the promise with it that in the foreseeable future there would be a progressive normalisation of inter-community relations.

A final dynamic at the level of interactions and policy discussions is related to the ways policy approaches tend to generate path-dependencies. Policy frames that have great discursive strength are able to steer the attention of policy makers and the wider public. Sometimes stakeholders see a problem in a way that seems unintelligible to outside observers. For a long time it was very plausible for local actors in Marseilles to argue that a “Cathedral Mosque” should be built because it was unacceptable that “Muslims had to worship on the street”, even though it would only take a few seconds to understand that such a central new building would not solve the problem of a lack of space. When policy frames can hook into the vocabulary and practices of established institutions they gain in plausibility and obtain a taken-for-granted status. This was extremely well illustrated by the ways urban planning discourses produced their own set of meanings in Rotterdam. Municipal officials in Rotterdam had no problem talking at length about “parking tables”, “assigned dog-walking spots” and the “maintenance of fountains in the city district” while simultaneously underscoring that they were in the process of accompanying the building of something that looked like “the Tash Mahal”. Sometimes the discussion settings themselves structured what were experienced as meaningful ways of talking about mosque creations. The town planning practices in Rotterdam focussed debates onto down to earth issues and practical concerns. The discursive format of the municipal hearings held in Marseilles stimulated more abstract reflections on the future of Islam and the nature of French secularism. Interestingly, despite these differences both settings allowed those who were participating in these discussions to draw upon discursive and institutional repertoires enabling them to articulate their views on the kind of public policy responses they deemed appropriate. This study has focussed on the ways institutional environments entail opportunities and constraints to make mosque building

meaningful. They are important moments in which French and Dutch societies seek to represent and accommodate the presence of Islam while drawing on routines and institutionally grounded repertoires. The analysis of the ways these repertoires are simultaneously being destabilised, re-invented, changed and reproduced gives insight in the ways these European societies are being changed in the process of accommodation of Muslim populations and Islam.

9.4. Suggestions for further research

Studies on the accommodation of Islam in Europe need to move from the more general overviews of national approaches to more empirically grounded case studies that focus on the governance of aspects of Muslim presence and religious practices and needs. Institutional repertoires of governance of religion vary across institutional spheres. Therefore, case-studies are needed to explore in what ways country-specific institutional regimes shape strategies of accommodation in domains such as education, health-care and prisons. Comparative case-studies, such as this study on mosque creation or the study by Beckford et al. (2005) on Muslim spiritual care in prisons, can contribute to the further refining of our understanding of the ways institutional arrangements shape strategies of accommodation of religious minorities.

A second line of enquiry could be to further develop the perspective of governance to analyse the ways opportunities and constraints for religion are being developed. This study has corroborated the claim that governments do not only regulate (immigrant) religions via their religious and immigrant integration policies, but that opportunities and constraints are also shaped by rules and regulations emanating from domains as different as food safety, town planning or educational standards (cf. Bader 2003). Another reason to further develop the governance perspective is because it allows for a linkage between the literature on Islam in Western Europe and studies on forms of regulation and authority in environments that are politically, socially and culturally transnational. Citizens and non-nationals in Western European societies live in increasingly transnational religious and ethnic contexts, which in various ways presents a challenge for governments that attempt to regulate social processes and sustain cohesive and democratic societies. The fact that municipal governments in France and the Netherlands have converged around policy approaches that seek to accommodate “neighbourhood mosques” and “vicinity Islam” can be seen as a pragmatic way of handling the need for adequate prayer facilities. But it is also an attempt to invent ways to re-embed immigrant communities that live part of their religious life in a transnational context into the local sphere of reference and into the social life of the neighbourhood.

A third line of inquiry would simultaneously draw on historical analysis and the study of actual public policy practices to study institutionalised regimes of government. National models are “historical products” and their history cannot be accurately described by exclusively looking at formal and legal regulations. In addition, national models are also “models for”, to use John Bowen’s phrase, which are used by actors in various settings, for specific purposes and with particular consequences (cf. Bowen 2007). A focus on the practices of application in which institutional arrangements are made relevant by various actors is thereby a way of resisting the temptation to reify country-specific regimes into stereotypical models that hinder empirical observation and obstruct policy learning across national boundaries.