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### Constructing mosques : the governance of Islam in France and the Netherlands

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# The governance of Islam and the construction of mosques in Western Europe

## 1.1. Introduction

In October 2001 the Mevlana Mosque in Rotterdam opened. The new building follows a Turkish design, with two slim minarets, pink panelling and a green dome. Its traditionally styled architecture merges with the use of contemporary building techniques, and the walls consist of pre-fabricated concrete that has been plastered and painted. The mosque is situated on a remarkable spot on the edge of a neighbourhood where it can be seen from the train coming from The Hague. By its location and distinctive architecture, the building is much like many new mosques that have arisen in the Netherlands throughout the 1990s.

During the ceremonial opening, the Mayor of Rotterdam, Ivo Opstelten, spoke warm words of welcome. He said that the new building finally gave the “mosque the status it deserves”.<sup>1</sup> A journalist spoke of the “spatial integration of Muslims in the Netherlands”. Turkish Muslims were rightly proud of what they had accomplished and some credit should also be given to the municipality that had laid down in policy that the Muslim community was an “important part of the town community”.<sup>2</sup> New mosques were taken to illustrate how the ethnic composition of Dutch cities had changed because of immigration.<sup>3</sup>

When I began this study, the creation of new houses of worship by immigrant communities was very much understood in terms of the “politics of recognition”. My aim was to analyse public discussions regarding the building of mosques in the Netherlands and in France as emblematic of negotiations on diversity in multicultural societies. While talking over my plans with a scholar of Islam in the Netherlands the question came up as to whether yet another study on the issue of mosques was worth the trouble.<sup>4</sup> He believed that research on Islam would now focus on more exciting issues, such as the development of religiosity among second generation Muslims. The dynamics of the institutionalisation of Islam had already been documented. It was conceived as a success story. Immigrant communities had been confronted with hostility, prejudice and fear when seeking to find recognition for their religious demands, but gradually

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- 1 Cited in “Vierduizend Turken trots op hun Mevlana-moskee” in *Rotterdams Dagblad* October 8 2001.
  - 2 See “Een wedloop van moskeeën” in *NRC-Handelsblad* November 5 1999 and “Een pand dat moslims een gezicht geeft” in *Trouw* October 8 2001. The statement on Rotterdam mosque policy figured in an interview with the architect in “Moskeebouw naar NL-concept” in *B+U* March/April 2002.
  - 3 The idea that new mosques demonstrated that Dutch society had changed because of the presence of immigrants was articulated somewhat earlier in a background article. See “Hoe groter de moskee, hoe dichter bij Allah. Islamitische bouwkunst in Nederland” in *Intermediair* July 16 1993.
  - 4 Early studies on the institutionalisation of Islam extensively discussed public policies with regard to the financing of mosque building. See for example Shadid and Van Koningsveld 1995; Rath et al. 2001. Studies on public discussions on mosque creation in Europe include Eade 1996; Buijs 1998; Lindo 1999; Frégosi 2001; Gale and Naylor 2002; Cesari 2005a and 2005b; and Hütterman 2006. For a discussion see my review of the literature in *Making Muslim presence meaningful. Studies on Islam and mosques in Europe* (2005) available at [www.assr.nl/workingpapers/documents/ASSR-WP0503.pdf](http://www.assr.nl/workingpapers/documents/ASSR-WP0503.pdf)

they had managed to overcome the main obstacles and in the process the receiving society had become more accustomed to the presence of Islam. As the subtitle of a book put it, Muslims had emancipated “from prayer rug to minaret”.<sup>5</sup> Thus understood the politics of recognition was actually an evolutionary process in which cultural minorities went through successive stages of emancipation, contestation and acceptance and that could only find its end point in the emergence of a multicultural society. As it happened, the Netherlands were setting an example for other European countries to follow, because it accommodated new ethnic and religious communities in a supportive manner.

Understood in these terms, my study would do for the 1990s what others had done for the 1980s. It would document the ways Muslim communities progressively had to break down walls of prejudice when seeking recognition. A new aspect of this continuing process would be the building of new mosques, which would bring to the fore the issue of *visibility*. One of my thesis supervisors suggested that demands of immigrants to be visibly represented in the public realm would set off a new dynamic of contestation. He suggested I focus on the ways contemporary discussions on newly built mosques were essentially a renegotiation of “the symbolic order”. The increasingly visible presence of ethnic communities would oblige French and Dutch societies to conceptualise their symbolic universes anew.

After collecting my first material in the Netherlands I went to Marseilles for a period of several months to collect my data on the French case study. Many of my assumptions about the ways discussions on mosques developed and what they essentially were about were being destabilised. Actually, there were no discussions on the building of mosques in the Southern French city. There was only a large discussion on the building of a central mosque for all Muslims in the city – a Cathedral mosque as it was called – that had been going on for more than a decade. I was inclined to see here how the politics of recognition of Islam were being shaped by French political culture and its emphasise on unity and centrality.

In the meanwhile I had stumbled across mosque building plans in Marseilles that dated back to 1916, 1937 and 1942. None of these projects had actually been realised, in contrast to the Paris Mosque that had been completed in 1926. I could have chosen to ignore these earlier mosque building projects, after all my study focussed on the 1990s, or treat them in the way French scholars had discussed the creation of the Paris Mosque as an anecdote of colonial “times gone by”. Seen in a different light, these very projects could also be seen as a challenge to some of my leading assumptions. These mosques and their minarets were not the end-result of a gradual process of emancipation of Muslim communities that had begun worshipping on a prayer rug. The favourable reactions of the French to the creation of these mosques could not be explained in terms of a progressive growth of tolerance and understanding of multiculturalism. The idea that perceptible mosques and minarets were always seen as a threat to “the symbolic order” seemed increasingly doubtful.

When I returned to the Netherlands, about a year after 9/11, things became even more confusing. In the context of deep controversies about the perceived stagnation of immigrant integration and the spectacular rise of Pim Fortuyn, Dutch discussions on Islam had turned bitter. Highly polemical discussions on mosque building projects in Rotterdam and Amsterdam had developed. Populist politicians spoke of the new mosques as unsightly “oriental sugar cakes”,

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5. This was the subtitle of a study on the institutionalisation of Islam in the Netherlands by Landman 1992.

illustrations of “Arab conservatism”, “palaces of hatred” and symbols of the “multicultural tragedy”. The Mayor of Rotterdam now also seemed to have a different view of the matter. During the ground breaking ceremony for the building of a Moroccan mosque in 2003 he expressed his misgivings about the design. It was too prominent, demonstrated a lack of respect for “our culture” and therefore risked becoming an “exotic attraction”.<sup>6</sup> The Mevlana mosque – once a symbol of the “spatial integration of Muslims” – was now depicted as an example of awful architectural kitsch that in a disturbing way displayed the collective “nostalgia” of immigrants and their utter unwillingness to integrate and adapt to the Netherlands. By 2004 the populist party Liveable Rotterdam had come up with plans for a municipal policy that would prevent the building of mosques in an “out of the ordinary style”. National politicians even advocated a general ban on the building of new mosques.

The upheavals in discussions on immigrant integration and Islam in Western Europe over the past decade have been represented as illustrative of a “backlash against multiculturalism”.<sup>7</sup> That image is unfortunate. It evokes the image of embittered social scientists who are forced to “sit still and wait” until the tide of popular opinion has changed and everybody will once again understand that multiculturalism is actually a good thing. Speaking of a *backlash* against multiculturalism is also problematic because it suggests an explanation of present day contestations in terms of malice and fear. Coupled with the now fashionable concept “Islamophobia” the backlash against multiculturalism is seen as being caused by (extreme) right wing politicians and ignorant, racist and fearful citizens – the “enemies of Islam” – that have taken public agendas hostage and deliberately marginalise well-meaning immigrant communities and the “friends of Islam”.

The thesis I will defend in this book is different. I argue that recent discussions as well as history illustrate that there is a need to rethink prevailing understandings about the factors that shape accommodation of Islam and Muslim immigrant communities and explanations of when and why processes of accommodation and incorporation become contentious.

The ways in which the presence of Islam and the creation of Muslim institutions becomes seen as problematic crucially depends on the ways that presence is represented in public discussions. There is truth in the observation that those aspects of Islamic presence that are more perceptible and that involve Muslim communities making claims within the public realm can more easily lead to contestation. But if they actually do and *how* they do very much depends upon how discussions develop. Invisible Muslim presence can sometimes become equally problematic. Symbols of the presence of Muslims or their institutions are being staged as “drama” and become public issues in need of government regulation (cf. Gusfield 1981). In other words, whether or not the construction of mosques becomes a contentious issue, and if so how, depends on the social-construction of meaning.

The idea that mosque buildings challenge the “symbolic order” should be understood in light of the ways Berger and Luckmann define symbolic universes as the “matrix of *all* socially objectivated and subjectively real meanings” (Berger and Luckmann 1991: 114, italics in the original, M.M.). These universes depend on the ability of institutions to meaningfully regulate social situations that present themselves within a society. This means that mosque buildings do

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6. See “Eerste steen mengeling van trots en gekrentheid” in *Rotterdams Dagblad* October 22 2003.

7. See Vertovec and Wessendorf (eds) 2008.

not necessarily become public issues because they are perceptible or because they function as symbols. They do if they are socially constructed in such a way that institutional arrangements are insufficiently capable of accommodating the social situations and latent social conflicts associated with mosque creation. So answering the question as to why sometimes discussions on mosques are so contentious, means simultaneously exploring why sometimes they are not. To investigate this I will analyse the ways mosque creation has been represented in light of varying institutionalised regimes of regulation and how depending on the particular attributions of meanings that have come to dominate the issue-field, dynamics of contestation and accommodation develop.

The focal point for the analysis will be policy making processes broadly understood. Policy making is the dominant way in which modern societies regulate social conflicts and situations that have come to be defined as problematic. It requires “the redefinition of a given social phenomenon in such a way that one can also find solutions for them” (Hajer 1995: 2). This makes public policy making and the formation of policy responses around the construction of mosques the appropriate site to analyse how societies represent and regulate Islamic presence and accommodate Muslim immigrant minorities. Public policy responses are all actions engaging public authorities, including decisions not to act, that are developed in view of accommodating Islam and Muslim populations. They comprise laws and regulations, policy memoranda, guidelines and declarations, plans and projects, the creation of special public institutions and subsidy schemes. These actions are called policy *responses* irrespective of whether they result from previous demands raised by organised Muslim groups.

## 1.2. Islam and public policies in Western Europe: the state of research and theory

Over the past decades Muslim communities in Western Europe have set up a range of institutions serving for their religious, social, cultural and educational needs. The development of these institutions is the result of series of interactions, involving organised Muslims, governments of the countries of origin of immigrants, international Muslim organisations, public authorities at national and local levels, and a range of other host society actors.<sup>8</sup> Institutionalisation patterns are significantly shaped by characteristics of the societies in which Muslims live, including prevailing state-religion legislation, attitudes among government officials and the wider opinion climate towards Islam. Legal overview studies have mapped out the relevant constitutional

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8. Early studies on the institutionalisation of Islam in France include Leveau and Kepel (eds) 1988; Kepel 1987 (a second edition was published in 1991, I will refer to the second edition); Étienne 1989; and Cesari 1994. On the Netherlands: Shadid and Van Koningsveld 1990 (second revised edition 1997); Doornik 1991; Landman 1992; Sunier 1996; and Rath et al. 2001 (Dutch version 1996). Important early studies on Islam in Europe include Gerholm and Litman (eds) 1988; Nielsen 1992 (third revised edition 2004); Shadid and van Koningsveld 1995; Shadid and Van Koningsveld (eds) 1996a, 1996b; 2002a; 2002b. In this chapter I have included only a selection of references to studies on Islam in Western Europe. A more extensive bibliography and discussion can be found in my review of the literature in *The Governance of Islam in Western Europe. A state of the art report* (2007). Available at: <http://www.imiscoe.org/publications/workingpapers/onlinediscussionislam.html>

regulations and religious policies that structure opportunities for Muslim communities in different countries.<sup>9</sup> Social scientists have analysed in a comparative perspective the ways “societies create opportunities for Islam, or oppose them” (Buijs and Rath 2002: 9).<sup>10</sup>

Early studies on the institutionalisation of Islam in Western Europe borrowed heavily from the conceptual maps of immigrant integration studies. They were inclined to represent the development of Islamic institutions as an evolutionary process of emancipation that would find its end state in a complete integration of the “new religion” and possibly in the forming of a “European Islam”. Increasingly it has become obvious, however, that there is little sign of convergence of patterns of institutionalisation of Islam in different countries. It is also problematic to assume that the process of institutionalisation of Islam is out of necessity progressive and moving towards an end state when Islam will be fully integrated and accepted.<sup>11</sup> The development of Islam in Europe comprises many setbacks, changes of direction and unexpected turns. What may appear completed and well accepted Islamic institutions and accomplished rights may, sometimes unexpectedly, become subject to intense contestation and public debate. This also points towards the complex political nature of the process of formation of Islamic institutions.<sup>12</sup>

Existing patterns of institutionalisation of Islam can better be understood as the outcome of a political process in which organised groups of Muslims enter into relations of cooperation and conflict with a range of actors, institutions and governments, both in the host society and beyond. The institutionalisation process can then be analysed by borrowing from political process theories and research on interest organisations, collective action and social mobilisation. Group-related factors, such as the decentralised institutional structure of the Islamic faith, the ethnic composition of the Muslim population, the financial resources of Muslim communities and the density of the networks of organisations, can explain the outcomes of these social and political processes to some extent. To a significant degree, however, outcomes crucially depend

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9. For legal studies see Basdevant-Gaudemet 1996; Ferrari and Bradney (eds) 2000; and Hafiz and Devers 2005. Legal survey studies usually lack attention to the social context wherein regulations operate and for the waplication of regulations (Rivers 2000). Therefore they do not provide much insight into how constitutional principles, legal regulations and policy guidelines shape policy responses and policy implementation. Without the study of application it remains unclear how written laws may “bend under the weight of interpretation” (Bleich 2002: 1055). Constitutional and legal regulations and religious policies are but one aspect of the institutional arrangements shaping accommodation policies. Legal surveys have focussed on the comparative analysis of legal arrangements in different countries, but they have done little to explain the “emergence, stabilisation and reproduction” of these arrangements (Bader 2007b: 877).
  10. See recently Rath et al. 2001; Fetzer and Soper 2005; and Laurence and Vaisse 2006.
  11. The image of Islam as a “new religion” and of the process of institutionalisation as evolutionary was repeatedly evoked in the titles of studies on Islam. The subtitle title of Kepel’s earlier mentioned study on Islam in France was the “birth of a religion” (Kepel 1991; also Cesari 1995). The subtitle of the Dutch edition of the study by Rath et al. 2001 on Islam in the Netherlands was “A de-pillarised society reacts to the development of a ‘new’ religion”. Tietze (2001: 20-43) distinguishes between successive phases of research on Islam in Europe that he labels respectively the phase of “transplanted Islam”, “Islam of immigrants” and “integrated Islam”.
  12. For a long time leading scholars of Islam in Europe argued that receiving societies essentially had two options when it came to accommodating Muslim needs: they could either grant Muslims equal right and recognition or they could obstruct these demands and decide to treat Muslims unequally. Whenever there was political debate on whether and how to accommodate Muslim demands, critical researchers all too rapidly concluded that protests were a result of unfamiliarity, prejudice and simple hostility against Muslim immigrants. The idea that protest and rejection of Islam resulted from a lack of knowledge often inspired pioneering researchers to explain at length what Islamic doctrine and belief consisted of. See for example Waardenburg (ed.) 1987.

on host-society factors, including institutional arrangements, pre-existing social conditions and “the political environment into which migrant religions have to find a space for their community” (Statham et al. 2005: 429).<sup>13</sup>

Studies on the politics of Muslim mobilisation have first and foremost built on existing research on ethnic mobilisation and the formation of ethnic communities and organisations. Ethnic organisations face specific institutional opportunities and constraints that are notably shaped by country-specific regimes that regulate rights of immigrants and possibilities for access to citizenship.<sup>14</sup> Other external opportunities for ethnic organisations comprise prevailing attitudes with regard to the presence of immigrants, the existence of anti-immigrant movements and political parties, and ideas about the legitimacy of ethnic community formation.<sup>15</sup> It has become increasingly clear however, that Muslim organisations should not simply be put on a par with other types of ethnic organisations. Organised Muslims also face particular opportunities and constraints. The ongoing public debates on Islam, for example, have important consequences for the opportunities of Muslim organisations in the West, but less so for secular ethnic organisations.<sup>16</sup> In addition, institutional opportunities and constraints are significantly shaped by national regimes of governance of religious pluralism.

Political mobilisation theories typically conceptualise the factors that shape collective action as external opportunity structures. In their theoretical models these opportunity structures are taken to be stable over time and relatively unequivocal in the way they shape public policy responses. Unfortunately, most comparative country studies in this tradition have worked with rather crude images of national models. Illustrative is the constant presentation of the French secular model as unfavourable to the recognition of Muslim claims, and of Dutch and British “multicultural models” as willing to grant immigrant communities “group rights”.<sup>17</sup> In reality,

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13. An important aspect of Muslim mobilisation is the way external opportunity structures shape processes of public claims making. Rath et al. (2001) argue that in the Netherlands Muslim claims for equal treatment encountered more support than claims for exceptional treatment. Koopmans et al. (2005) and Statham et al. (2005) in a similar way distinguish between group demands for parity of treatment and those for exceptional treatment. These demands encounter different responses depending on the political and discursive opportunity structures in different countries (Statham et al. 2005: 431). Koenig and Bader distinguish between demands for the practical accommodation of religious practices by ways of exemptions, for some autonomy in organised societal spheres, for pluralisation of education, media, public culture and symbols of national identity, and for group representation and political participation (Bader 2007a: 18; Koenig 2003 and 2005). A recent comparative study on state accommodation of Islam in Britain, France and Germany emphasises the pivotal importance of church-state patterns in structuring political arguments and accommodation policies (Fetzer and Soper 2005).
  14. A well-known distinction is between citizenship regimes based on *ius soli* versus regimes based on *ius sanguinis* (Brubaker 1992). Other typologies look at the institutional and cultural incorporation of ethnic minorities (see Bader 1997 and 2007a: 193ff.). Koopmans et al. (2005: 10) distinguish between four conceptions of citizenship and immigrant incorporation: assimilationism, segregationism, universalism and multiculturalism. See also Soysal 1994; Castles 1995; Favell 1998; Kastoryano 2002; Koenig 2003: 155ff; and Alexander 200w.
  15. See for example Geisser 1997.
  16. See for example Sunier 1996.
  17. Especially Koopmans et al. 2005 and Statham et al. 2005 use broad brushed images of national models. Statham et al. (2005: 445) argue that the Dutch state is willing to “grant cultural group rights” that immigrant groups “do not even want”. At closer look this characterisation of “the Dutch model” is justified by an example taken from a single newspaper clipping. Another way of alluding to the presumed self-evidence of what actually is a stereotypical image of a national model is the reference to a situation that is taken to be “typical”. In the case of policy responses to Islam in France the example of the Mayor of Charvieu-Chavagneux who had a prayer house

national accommodation policies in these countries have varied significantly over the past 30 years. There are also considerable differences between public policies that are developed at different levels of state organisation (national, federal, municipal) and in different institutional spheres (such as education, media, and penal institutions). A second problem is that political process theorists tend to understand public policy responses as a result of societal pressure and as *reactions* by public authorities. However, often times public policy is formed, not in reaction to external demands, but as a result of ideas and concerns within the policy making process itself. Examples are efforts to create imam training programs in Western Europe and municipal programs to combat radicalisation among younger Muslims. Public policies often result from a reciprocal adjustment of ideas of organised Muslims, groups in the host society and government officials.<sup>18</sup>

A more recent development in research on Islam is the turn towards theoretical approaches that explain public policy responses in light of country-specific institutional arrangements. Muslim demands for recognition are then seen as incentives for policy making.<sup>19</sup> Two types of institutional arrangements considerably shape accommodation policies with regard to Muslim demands. They are country-specific regimes for handling national integration, cultural diversity and immigrant integration, and institutionalised church-state relations. The fact that these two institutional arrangements have been so crucial is because in a West-European context Islam is *a religion* that has been introduced via *immigration*.

There is obviously a risk that institutional theories will also end up using rather crude images of national regimes and presume that these regimes cleanly determine actual policies of accommodation. This can be avoided, however, if institutionally oriented theories take to heart three inter-related insights that come forward in recent studies. I will discuss these aspects shortly here because they form the basis of my own approach which is further developed in the next section.

In the first instance, efforts to regulate social problems on the basis of institutional arrangements are crucially shaped by the ways these problems are defined. In the case of the presence of Islam in Western Europe there are extra reasons to carefully analyse the ways policy making processes are motivated and informed by the social construction of public issues. This is nicely illustrated in John Bowen's analysis of discussions on the Islamic headscarf in France. Through a careful reconstruction of the ways "a bit of cloth" came to stand for major societal problems in French society, it becomes explicable why French authorities in 2004 banned all signs that clearly show a religious affiliation from public schools. By that time the headscarf had become

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destroyed by a bulldozer in 1989 has figured countless times as the illustration par excellence of the obstacles Muslims in France have encountered in creating institutions (See Kepel 1994; Cesari 1997; and Fetzer and Soper 2005: 88-89).

18. This aspect is usually hidden from view in political process studies that, often in an attempt to test causal models, seek to quantify policy responses and outcomes instead of describing more in content what they consist of. However, understanding accommodation policies also requires a study of the substance of public policies, which means analysing what type of mosque buildings are encouraged, what criteria apply to the forming of Muslim schools and the specific ways the need for Muslim spiritual care in prisons and hospitals is accommodated and for what reasons. See Beckford et al. 2005 for an excellent case study on the accommodation of Muslim needs in prisons in France and Britain that does take notice of the substance of accommodation policies.
19. See Rath et al. 2001; Koenig 2003 and 2005; Fetzer and Soper 2005. Zolberg and Long (1999) compare the reactions towards Islam in Europe to those towards the Spanish language in the US in order to understand responses to cultural diversity in light of path-dependent institutional patterns.



an issue of national importance. As Bowen demonstrates, French elites had come to believe that if the state showed its determination to prevent Muslim girls from wearing a headscarf in public schools, it was showing its capacity to tackle urgent social issues such as sexism, social and ethnic segregation, and Islamic fundamentalism. Understanding the formation of this particular public policy response thus required a reconstruction of the ways the headscarf became a public problem and an analysis of the particular role of the state and the legislative process in France for the regulation of social conflicts (Bowen 2006). More generally, I would conclude that depending on the specific understanding of public issues, different institutional arrangements and different levels of state organisation (state, federal, local) may come into play and different kinds of public policy responses are deemed appropriate. Sometimes Muslim demands are framed in such a way that they can quite easily be regulated.<sup>20</sup> It may also happen that an aspect of Islamic presence or practice comes to be seen in the light of profound moral issues and as a threat to the institutional ordering of a given society. In that case discussions on regulation will tend to become complex and contentious, and they may touch upon ideas about the very character of the state and crucial values of modern societies.<sup>21</sup>

In the second instance, while it is true that public policy responses are significantly shaped by regimes of government of religious diversity and national integration, it is also clear that these regimes are internally more heterogeneous and less unequivocal than had initially been assumed. For example, the clear-cut typology of national models of citizenship and nationhood in France and Germany as developed by Brubaker (1992), has been complemented, but also challenged, by empirical studies that have demonstrated that important variations exist in these countries (Bowen 2007: 1005).<sup>22</sup> Studies on church-state regimes more and more recognise that country-specific institutional arrangements are historic products and that they consist of elements that may exist in tension or in contradiction with each other (Koenig 2007: 912; Bader 2007a). In addition, there is a widely felt need to combine a more general analysis of distinctive national governing approaches with the study of actual accommodation policies, developed at different levels of administration, and also in specific societal sectors. For example, public policy responses in prisons may well be different than those developed in the sphere of public education or when compared to municipal policies around the creation of mosques. Finally, states do not exclusively regulate religious issues via their religious and integration policies. The actual opportunities for religions are also shaped by strategies of government related to public health, urban planning, or housing (Bader 2003: 64). Empirical studies on what

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20. For example, an issue such as the creation of Muslim cemeteries has frequently been dealt with in pragmatic ways by municipal governments acting on the basis of existing regulations within the sphere of urban planning and funeral arrangements. There are also counter-examples because sometimes (public) cemeteries also have symbolical significance within a particular country. France is an important counter-example given the relatively strict rules concerning the use of religious symbols on public cemeteries (cf. Bowen 2006).
  21. National governments will also become more involved when issues require some kind of national regulation, as in the case of creating a representative Muslim body. In a context of Europeanisation of government, church-state regimes often are also interpreted as symbols of state sovereignty and national distinctiveness. By consequence social-constructed interpretations of national models may become of more influence in stamping policy responses (Koenig 2007: 928).
  22. Studies that have described the development of citizenship and integration policies in France in a more historical way include Favell 1998; Feldblum 1999; Weil 2004; Spire 2005; and Rosenberg 2006. For Germany see notably Joppke 1999.

governments “actually do to religions” may bring to light important differences and similarities in the regulation of Islam. These studies may then help to further develop and refine models of national regimes of government and governance (Bader 2007b).

Finally, institutional approaches stand to gain from a more accurate historical perspective on the accommodation of Islam. Basically, all existing studies have analysed the forming of Islamic institutions in the period between the late 1970s and the present day. Given this time-frame, the creation of Islamic institutions was conceptualised as an aspect of a wider process of immigrant integration and the formation of ethnic, community-based institutions.<sup>23</sup> I argue that this research perspective has blocked other possible ways of understanding the formation of public policy responses to Islam. Let me elaborate this a bit further.

Until recently, there has hardly been an interest in exploring the possible continuities and ruptures between the governance of Islam in the colonial period and the accommodation policies developed over the past 30 years. This is remarkable, because in the case of European countries such as France, the Netherlands and Britain, post-war immigration has been significantly related to the aftermaths of colonial rule. Most Islamic institutions in Western Europe that predate the 1970s are in one way or another related to the history of European imperialism. This applies to the mosques that were built in Liverpool (1887), London (1926) and Paris (1926). There are also Muslim cemeteries that were created in Europe and a special Muslim hospital was founded in 1935 in Bobigny, a small town close to Paris. A historical discussion of the accommodation of Muslim populations in Europe in the late 19<sup>th</sup> and early 20<sup>th</sup> century may help to critically reflect upon the now popular idea that until “our age of migration” a geographic and cultural abyss was separating Europe from the world of Islam. Knowledge of these encounters with Islam may also help to create reference points bridging between Muslim immigrant and native European populations.<sup>24</sup> However, there are also other important theoretical reasons to make institutional approaches more historically sensitive.

Institutionally oriented studies on state accommodation of immigrant populations have tended to assume that regimes of citizenship and nationhood shape the way countries incorporate immigrants and design integration policies. In short they argue, for example, that there exists a French Republican model and that by consequence immigrants in France will encounter a particular type of accommodation policies that are recognisably “French”. However, historical studies have shown that this simple image may be misleading. For example, in the 20<sup>th</sup> century, France has accommodated immigration of Italians, Spaniards and Greeks in a very different way than it has responded to the presence of Polish immigrants who were recruited as temporary foreign workers in the 1930s.<sup>25</sup> The actual differences of approaches and incorporation policies

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23. There are relatively few studies on policies of accommodation of Islam in the 1960s and early 1970s (Tietze 2001: 20-43). Sunier (2006: 144ff) argues that in this period pioneering researchers on Islam were mostly religious scholars and cultural anthropologists with a specialisation in Islam. Most researchers argue that in this period Islam had led a “hidden existence” and policy reactions to Muslim religious needs were “fragmentary” and “*ad hoc*” (Rath et al. 2001: 27). Exceptions are Theunis 1979; Kepel 1991; and Krosigk 1999.

24. In recent years the interest for the study of colonial policies and Islam in light of more contemporary experiences in Europe has grown. See Renard 2000 and his forthcoming PhD-thesis on the accommodation of Islam in France; Le Pautremat 2003; Luizard (ed.) 2006; Bowen 2006; and Geisser and Zemouri 2007.

25. See Cross 1983; Ponty 1990; and MacMaster 1997. Studies that take a more long-term historical perspective on immigration to the Netherlands include Amersfoort 1982; Lucassen and Penninx 1997; and Lucassen 2005.

that exist *within* “the French model” are demonstrated most dramatically when the experiences of European and colonial immigrants are compared. A recent study demonstrated how in the 1930s, French governments subjected Algerian Muslim immigrants to “much greater disciplinary controls than any foreigners” (Rosenberg 2006: 206). A historical perspective will also be valuable to better understand what ideas are shaping contemporary integration policies, especially with regard to those immigrant populations that, for whatever reasons, carry the legacies of having been subject to previous forms of government by European states. The situation of post-colonial immigrants, such as Algerians in France, is of special interest.<sup>26</sup>

The historical perspective and especially the focus on the colonial period will help to correct another flaw in existing studies on state accommodation of Islam. Institutional studies have borrowed from church-state theories and they have rapidly concluded that the ways states respond to Muslim religious claims varies because of their distinctive institutionalised regime of governance of religious diversity. However, that view seriously underestimates the relevance of how European imperial states have been involved in the governance of Islam in ways they have not been with the governance of other religions, such as Hinduism, Confucianism or Buddhism. It is necessary to explore whether those colonial experiences may continue to be relevant.<sup>27</sup> This approach may also help to understand whether, and if so in what ways, the situation of Islam differs relevantly from that of other immigrant-origin minority religions in Western Europe

### **1.3. A historically sensitive, institutional approach to the study of public policy discussions on Islamic presence and mosque creation**

#### **1.3.1. Policy-making and Islam: discourse and institutions**

This study analyses the ways in which institutionalised regimes of government shape public policy making processes around Islam in France and the Netherlands. Public policy responses have been defined generally, as all actions engaging public authorities, including decisions not to act, that are developed in view of accommodating Islam and Muslim populations. I focus in particular on public policy responses towards the creation and functioning of mosques.

Institutions of government in all their diversity – including institutions of political authority and decision making, judicial institutions, public administrations at different levels, bureaucracies and public services – regulate social processes and situations. They operate in view of public policies that are developed intentionally. Understanding the formation of public policies and policy responses requires an analysis of the process in which situations are being converted into policy-related issues that need and can be acted upon. It means analysing the “culture of public problems” and the narratives and images leading up to government regulation

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26. See also Lucassen 2005.

27. The dialectical relations between the development of church-state regimes and colonialism in Britain and India has been analysed by Van der Veer (2001a).

(Gusfield 1981). The social construction of public issues is a political struggle involving alternative definitions of social problems and different suggestions about appropriate courses of action. Competing groups of actors and stakeholders articulate and defend definitions of what the problem shall be taken to be, and thereby they include the concerns of some and exclude those of others, they distribute responsibilities for past failures and future measures, they invent and support possible courses of action and indicate what institutions can regulate problems well, and they seek to position the stakeholders and their respective interests. Some definitions of reality and understandings of social phenomena gain dominance, while other understandings are simultaneously being discredited (Hajer 1995: 43-44).<sup>28</sup>

Political struggles around policy making take place at the level of public policy discussions, a specific type of public and political discussions. These discussions are oriented towards intentional action, meaning that ideas, statements of facts, theories and normative judgements are being articulated, not in the abstract, but in view of acting in order to address situations and social problems. In addition, public policy discussions are oriented towards institutions of government that can, and possibly should, address these situations and problems. Public policy discussions are not the exclusive domain of politicians or policy makers. They also emerge from interactions between individuals, local interest groups, broader social movements and institutions (Rein and Schön 1993: 145).

Public policy discussions are of an argumentative nature. Ideas are being articulated with the purpose of persuading others, to make them agree with specific constructions of reality, definitions of problems and conceptualisations of legitimate concerns and interests, and meanwhile to criticise counter-positions, discredit other views, and downplay the concerns and interests of others. Speaking of argumentative interactions does not mean that public policy discussions only consist of arguments and well-ordered propositions. Actors can draw upon a wide variety of discursive styles and representational devices. Public policy discussions comprise arguments and empirical observations, images and figures of speech, and categorisations of all sorts. A well-known example is politicians that evoke the image of “waves of immigrants overflowing the country” to justify a tougher immigration policy.

Discussions comprise regularities that build up specific ways of talking and thinking about reality. In theoretical traditions indebted to the work of Michel Foucault, these structured ensembles of discursive elements are called discourses, defined as “specific ensembles of ideas, concepts and categorisations” (Hajer 1995: 44; Foucault 1991). The analytic reconstruction of structured ensembles – discourses – in discussions can be done at different levels of abstraction and generality, meaning there are many possible ways to break down discussions and texts into a number of distinctive discourses. In the context of public policy discussions these cohering ensembles can be labelled policy discourses. They help actors to convert problematic situations into policy-related issues that can be acted upon.

An alternative way of conceptualising the regularities in discussions is through the concept “frame”. A frame is “an interpretative schemata that signifies and condenses the ‘world out there’ by selectively punctuating and encoding objects, situations, events, experiences, and

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28. Political scientists have analysed these processes in light of theories on “agenda setting”. Well known is Schattschneiders famous definition of politics as about the “mobilization of bias”. For social-constructivist theories on the formation of public, political and policy agendas see Fischer and Forester (eds) 1993 and Hajer 1995.

sequences of action in one's present or past environment" (Snow and Benford 1992: 137).<sup>29</sup> In the context of the policy sciences the crucial concept is that of a policy frame:

a set of cognitive and moral maps that orients an actor within a policy sphere. Frames help actors identify problems and specify and prioritise their interests and goals, they point actors toward causal and normative judgements about effective and appropriate policies in ways that tend to propel policy down a particular path and to reinforce it once on that path, and they can endow actors deemed to have moral authority or expert status with added power in a policy field, in this way, frames give direction to policy making and help account for policy outcomes (Bleich 2002: 1063-64).

Policy frames function as searchlights, similar to the way a picture-frame brings out what needs to be looked at by setting it apart from its amorphous background. A policy discourse can comprise several policy frames, or alternatively several policy discourses can be structured around a particular policy frame.

Some approaches to the study of frames and framing in public policy making have been lured to a realist view of politics. Realists argue that policy choices reflect the relative power of different interests in society and that politics is about strategic interactions between rational actors that pursue their respective interests (Dobbin 1994: 5). The activity of framing then becomes primarily an aspect of political strategy. In this perspective discourse serves as a strategic wrapping to communicate ideas, interests and beliefs successfully. These kind of strategic forms of framing certainly exist and they are becoming more important given the growing role of mass media, audience democracy and communication techniques. However, as an overall perspective on the role of language for human agency and social reality the realist view is not credible, and it obviously exists in tension with the earlier mentioned social-constructivist understanding of public policy making. It seems more plausible to think that people have learned to define and experience what they believe and think in discussions with others and on the basis of cultural understandings in the society in which they live. In addition, although many aspects of human agency can be said to be strategic, this is not the case for all forms of human understanding and action, and importantly it also does not mean that humans can manipulate at will all the structures that build up their social existence. The relations between social structures and individual and collective human agency can better be understood in terms of a "duality of structure" (Giddens 1984).

The idea of a duality of structure is that "social action originates in human agency of clever, creative human beings but in a context of social structures of various sorts that both enable and constrain their agency" (Hajer 1995: 58). When applied to the level of discussions, constraints entail rules of grammar and syntax of a particular language, but also already configured ensembles of ideas, categorisations and concepts that structure what can be said meaningfully in a given social domain. Even though these rules and configurations are in the end also human products, they have obtained a relative autonomy and thereby they shape the ways individuals talk and think. At the level of public policy discussions, actors will articulate their ideas and concerns about social situations in light of all kinds of assumptions about modalities of problem-solving

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29. Frame-theory has been incorporated in various social science traditions, including discursive psychology, sociology, media studies and social movements literature. See Snow and Benford 1992; Gamson and Modigliani 1989; and Gamson 1992. For a discussion of various approaches see Bader 1991; Entman 1993; and Steinberg 1998.

that are taken for granted. Deliberations on particular policy proposals will thus be shaped by existing “policy paradigms”. These interpretative frameworks consist of ideas and standards that specify “not only the goals of policy and the kind of instruments that can be used to attain them, but also the very nature of the problems they are meant to be addressing” (Hall 1993: 279).

Some researchers have argued that studying the role of discourses and frames in policy analysis comes down to analysing the “role of ideas in policy processes” (cf. Stone 1989: 282; Bleich 1998). Yet, the understanding of discourses as “ensembles of ideas” takes insufficient notice of the particular social context in which discourses are being articulated. It readily translates to a cognitive understanding of policy-making as a process in which “ideas” are exchanged and in which policy makers and societies become increasingly able to identify the most effective and efficient ways of addressing a social problem. Despite the fact that learning processes are an important aspect of policy making – they better be – the cognitive bias risks obscuring the political nature of policy discussions. In addition, a focus on “ideas” risks making less visible the relations between discourses and non-discursive elements of social reality. Social structures are made meaningful in discourse, but this does not mean that they do not exist other than “as discourse” (Bader 1991: 162ff.).<sup>30</sup> Such an idealistic view of language fails to see the ways discourses can become plausible and resilient because of the ways they are associated with non-discursive aspects of reality and with social practices.<sup>31</sup> Of particular relevance for this study, are the ways policy discourses are associated with social practices of regulation and institutions of government. Discourse can then be defined as: “a specific ensemble of ideas, concepts, and categorisations that are produced, reproduced, and transformed in a particular set of practices and through which meaning is given to physical and social realities” (Hajer 1995: 44).

### 1.3.2. Policy discussions and the role of institutions

Over the past decades there has been renewed interest in the role of institutions in social life. Institutions consist of the formal rules and informal constraints that form the framework within which human interactions take place and that structure everyday life. They are “humanly devised constraints that shape human interaction” and thereby build social orders (North 1990: 3). Institutions “by the very fact of their existence, control human conduct by setting up predefined patterns of conduct, which channel it in one direction as against the many other directions that would theoretically be possible” (Berger and Luckmann 1991: 72). Without institutions human beings would experience reality as a bewildering chaos and they would continuously have to

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30. Social structures are also, for example, being reproduced via dispositions of the body (*habitus*) that are formed in processes of socialisation that are not merely discursive (Bader 1991: 96ff.). Another famous critique of the idealist view of the power of language is Bourdieu’s deconstruction of Austin’s suggestion that the phrase “I baptize this ship” could in itself be understood as a speech act, altering the order of things. As Bourdieu observed, the speech act was only effective because it occurred in a particular social setting, during a ceremony, and because it was being performed by a person who had been authorised to perform this act and had sufficient social prestige to do so (Bourdieu 1999). Of course, “ceremonies”, “authorisation” and “social prestige” also only exist as *meaningful* phenomena through discourse, but this does not mean that they merely exist *as discourse* and that their social effectiveness stems from their discursive power.

31. As Hajer (1995) argues the analysis of the relations between discourse and social practice is strongly indebted to the later work of Foucault. See Foucault 1975 and 1991. See also Dreyfus and Rabinow 1982.

re-invent ways of doing and modes of action-coordination. Institutions establish how in a particular situation individuals should act according to pre-defined roles and rules. An important mode of action-coordination over time is routinisation. Institutions guide human interactions via a “logic of appropriateness”, meaning they encourage human beings and organisations to associate new situations to situations for which rules already exist and to do what is “appropriate” (March and Olsen 1989: 160). The distinguishing way in which a distinctive institution or institutional arrangement structures human interactions and shapes social processes can be called its (institutional) “logic”. But institutions also leave room for creativity and human agency. Rules and regulations need to be interpreted, situations need to be assessed and categorised, and actual interventions upon reality require flexible and contextual understandings. For their continued existence institutions depend on human agency because they also function to the extent that they are constantly reproduced in actual practices. Still, “routinised institutional practices tend to have a high degree of salience” (Hajer 1995: 57-58).

Institutions and discourses are dialectically related. Institutions coordinate actions and behaviour in a meaningful, not in a mechanical way. Institutions “make sense” through discourse. Institutions also need discourses for their legitimisation, both in terms of the cognitive validity of the meanings they establish and of the normative dignity of their practical imperatives (Berger and Luckman 1991: 111). Well-institutionalised sectors of society are legitimated in terms of relatively specialised, coherent and elaborate discourses or theories. These discourses “provide fairly comprehensive frames of reference for the respective sector of institutionalised conduct” (Berger and Luckmann 1991: 112; Bader 1991: 174ff.). At the same time discourses that are associated with established institutions gain in plausibility and become increasingly taken for granted. Forms of talking are associated with habits of doing and together they build up the “ways things are done”.

This more general discussion of the relations between discourse, institutions and social practice can now be focussed upon the level of policy making processes. In that case, the type of institutions under study are public policy institutions or straightforwardly institutions of government and governance.<sup>32</sup> These are all institutions that make up “the state”, understood very generally as including a wider variety of institutions of distribution of authority, political decision making, accountability and democratic representation, different branches of the executive power, different levels of administration, bureaucracies, public services and more independent organisations and service providers. Institutionalised *regimes* of government and governance are configurations of public policy institutions that are organised in a distinguishable way and that function according to specific institutional logics (Bader 2007b: 872).

These institutionalised regimes of government and governance can be analysed at a highly aggregate level, for example at the level of entire states. At that level one can distinguish between polity forms that function according to their respective – very broadly defined – institutional logics (Jepperson 2002).<sup>33</sup> At this general level one can also speak of a nation’s political

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32. I avoid speaking of “political institutions” because this may lead to confusion of the “institutions of government” with formal political institutions that are the “codified rules of political contestation” (Pierson 2004: 104) and comprise the institutional organisation of distinctive political systems.

33. Polity types are distinctively patterned structures of the organisation of collective authority and society. In Europe distinctive polity types developed during the period of modernisation and state and nation formation, and they stabilised by the late 19<sup>th</sup> century (Jepperson 2002). Each polity type structures institutional options in

culture, that is embodied in public policy institutions. Political cultures shape ideas about conceivable policy options, which are in turn informed by cultural notions of meaningful relations between causes and effects (Dobbin 1994: 228).<sup>34</sup>

At a less aggregate level, one can analyse institutional arrangements that regulate social processes and coordinate action in distinctive societal sectors, such as education, health, industrial relations, or religion. At this level distinguishable institutional logics inform public policies in the respective sector. In this sense one can speak of country-specific institutionalised regimes of government of education, health, industrial relations, or religion. Institutionalised regimes of government can be further disaggregated. *Policy strategies* that become institutionalised in a particular sector generate particular “organisational avenues for problem solving” within, and possibly beyond, that sector (Dobbin 1994). An institutionalised regime of government can also be said to generate and sustain various *policy regimes* that shape “policy packages” developed to address specific issues (Pierson 2004: 150). Actors that are involved in practices of regulation and policy making in a particular sector will draw upon existing policy strategies and institutional repertoires to talk, think and act on the basis of routine-like rules and regulations.<sup>35</sup>

Institutionalised regimes of government and governance also shape public policy *discussions*. In their attempts to suggest possible ways to convert social situations into policy-related issues that can be acted upon, actors will try, though not necessarily in the same way, to allocate situations and issues to particular institutional fields with which they are already familiar. At the same time their various – overlapping as well as diverging – understandings and perceptions are being guided by the categories and ideas that are generated and sustained by existing institutionalised regimes of government. This is not merely an analytical search for the right solution and the correct mode of regulation, but a struggle of competing and crosscutting definitions of reality and suggested strategies for government. Even though the policy frames and competing policy discourses are associated with social structures and institutional environments, there remains more than enough room for agency and political struggle at all levels: in the selection of institutional repertoires, in the social construction of problems, the normative evaluation of situations, and in the interpretation of facts and regulations.

However, institutional repertoires and policy frames that somehow gain dominance and are being translated into effective public policy responses and measures will tend to be self-reinforcing. Perceptions and understandings of situations are being shaped by the discourses and regulatory activities that are generated and sustained by institutionalised approaches. For example, once a particular social phenomena – say mosque creation – is framed as about town

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a distinctive way and thereby leads to the forming of recognisable institutional regimes in a variety of societal domains, such as industrial relations, public welfare, education and government of religion.

34. For example, in the 19<sup>th</sup> century the political culture of the United States, Britain and France “shaped new industrial and economic strategies principally by determining the kinds of economic and industrial *problems* nations would perceive and by delimiting the *solutions* that nations would conceive to those problems” (Dobbin 1994: 20, italics in original, M.M.).
35. Country-specific regimes of government need not be represented as internally homogeneous and unchangeable. Institutional regimes are themselves historical products that “as such inevitably contain within them multiple lines of reasoning and emotion, developed in counterpoint to each other, and in tension if not in contradiction with one another” (Bowen 2007: 1005). Speaking of institutional repertoires underlines the ways institutional regimes guide and shape the acts and understandings of individuals and organisations in a particular societal sphere (Scott 1987: 500).



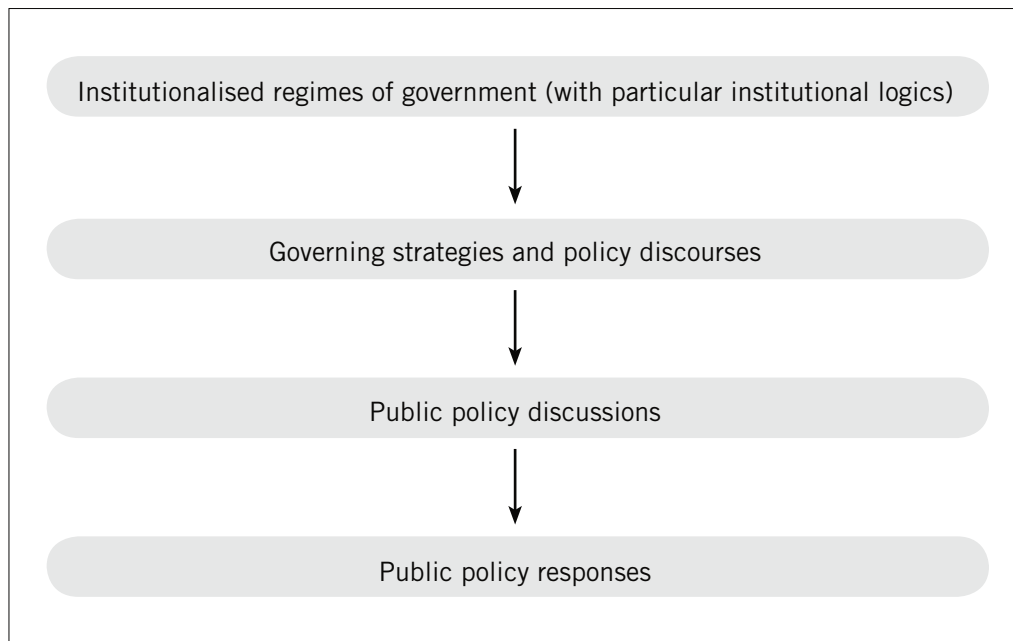
planning it will tend to be defined and categorised in the terms typical of institutions associated with planning. Problems that may arise are being addressed with the prevailing policy instruments and if problems persist or re-appear actors will be inclined to improve the governing strategies which had been defined as appropriate, not to immediately dismiss these arrangements. In addition, changing directions will inevitably bring extra political and economic costs. It may risk re-opening complex political negotiations, but it will also put at risk all kinds of investments that have been made in dealing with the situation. Despite the fact that there continues to be room for discussion and creative agency, options and alternative routes are being narrowed down progressively and concerns that cannot be addressed with the prevailing policy paradigm are being deflected. The different levels of structuration of public policies and public policy responses are shown in scheme 1.

### 1.3.3. Institutionalised regimes of government, public policy and social situations

When actors react to situations they find support within the institutions in their society that encourage them to go on as before. Sometimes social or physical phenomena are represented and experienced as a challenge to crucial institutions. Attempts to face these situations may result in strained and even violent efforts to uphold the institutional order. But they may also lead to institutional change, revolutionary or more incremental. Major transformations of institutional orders require the invention of new theories of legitimation and the social-construction of new symbolic universes that can again “integrate different provinces of meaning and encompass the institutional order in a symbolic totality” (Berger and Luckmann 1991: 112). Because modern societies are increasingly differentiated into various institutionalised spheres and complete subsystems, the role of symbolic universes and grand narratives as integrative forces at a meta-level has changed. In a globalising world, post-industrial societies are learning to live with higher levels of contingency, diversity, fragmentation and incomplete integration of symbolic, moral, cultural, social and institutional universes. Multiple integrative discourses and symbolic universes now have to co-exist and they have tended to become internally pluralized. Nevertheless, situations in which societies need to address social problems and develop public policies in an “institutional void” continue to be unsettling. Governments have difficulty in drawing on routines and need creative ways of framing situations, inventing new strategies of regulation and possibly creating new institutional arrangements (Hajer 2003). In addition, the institutions of government will in these situations usually operate under conditions of increasing societal pressure, which can be sparked off by social and economic crises, “moral panics” and feelings of unrest among citizens.

Frequently phenomena or situations are (perceived as) a challenge to *some* aspects of institutionalised regimes and to existing policy paradigms, but without being (seen as) a threat to the wider institutional order of a society as a whole. For example, in the 1970s rising rates of inflation and stagnation of growth and unemployment destabilised the institutionalised order of macro-economic policies in Western Europe that were based on a Keynesian paradigm. However, a new paradigm was found in monetarist economic doctrines. These allowed for a recreation of meaningful ways of regulating national economies and for the development of appropriate tools to address the new economic phenomena, and these were then institutionalised (Hall 1993). At the level of sub-systems and institutionalised sectors there are these kinds of efforts to re-embed situations into meaningful institutional arrangements and thereby to reproduce social order. A repeated failure to address a situation or problem within an institutional field may

## SCHEME 1 – Levels of structuration of public policy responses



*The arrows indicate directions of processes of structuration and shaping of public policy responses. Feed-back processes are not included in the model.*

result in it unsettling more encompassing institutional arrangements. If broader institutional arrangements are also incapable of regulating situations and processes in a satisfactory way, this may lead to further destabilisation of the entire institutional order.

The various kinds of challenges to institutional arrangements – from minor policy issues to (perceived) threats to crucial institutional arrangements – are articulated, defined and fought over in public policy discussions. Against a background of an existing institutional order actors move back and forth between institutions and discourses as meaningful repositories of experience. When coalitions of meaning around a particular definition of the public problem become dominant and corresponding strategies of regulation are agreed upon a process of “discursive closure” occurs that allows uncertainties to be settled for the time being (Hajer 1995: 61ff.). This will allow for more routine-like policy making and for institutions to regain their taken-for-granted status.

The presence of Islam and Muslim populations in Western Europe – in a variety of ways and for reasons that are contingent – can be represented as relatively “new” and can set off processes of public policy formation that can (but need not) challenge institutional arrangements at the level of particular policy spheres, and can (but need not) also challenge wider institutional arrangements and institutional orders in a given society. Seen in this light, a clearer conceptualisation of the kind of dynamics occurring in policy making processes around Islamic presence becomes possible. The issue of the accommodation of Islamic ritual slaughtering may serve as an illustration thereof.

For whatever reason, ritual slaughtering may become an issue on a public policy agenda. One could imagine a society that is completely unfamiliar with the whole concept of “people doing things with animals for religious purposes” and that, by consequence, would have great difficulty in developing plausible strategies of regulation. In the context of Western Europe, however, the practice of ritual slaughtering would probably be framed in light of the religious practices of a particular minority and as such it would be likely to categorize the demands of Muslims together with those of Jews. Still, it is not immediately clear what is to be done. Around the issue of ritual slaughtering various policy discourses have been produced that are supported by different groups of actors. Some groups in the host society will talk about ritual slaughtering in light of animal welfare and cruelty, other will link this practice to issues of hygiene and meat production. One of the major accomplishments of existing institutional arrangements for the regulation of ritual slaughtering is that they function as repositories of experience and comprise ways of balancing various perspectives, concerns and interests. Thus Muslim ritual slaughtering is seen as something that is relatively familiar because it is perceived through lenses coloured by experiences with *kosher* slaughtering. Institutional repertoires are immediately made available to regulate this “new” situation and the balancing of interests need not be done from scratch but can build on experiences. Strategies of governance can build on existing arrangements. Of course, this remains a “negotiated order” and arrangements can become subject to new rounds of public contestation. This may happen if new knowledge about animal suffering or new techniques of stunning become available, because value orientations change, or because at some point someone plausibly argues that Muslim and Jewish ritually slaughtering are actually very different phenomena.

The example of the accommodation of ritual slaughtering also hints at another difficulty surfacing in processes of converting situations into policy-issues. In modern societies, the regulation of the practice of ritual slaughtering inevitably cuts across a number of relatively autonomous and well-institutionalised spheres, including institutional arrangements to regulate animal welfare, religious freedom and food production. Stakeholders and actors with different institutional backgrounds will bring in their own legitimate orientations and concerns and various groups of actors will frame the practice of ritual slaughtering in very different terms. “Frame-conflicts” can easily result because the very perception of the situation of someone cutting a sheep’s throat is fundamentally different: an animal rights activist will see an act of unnecessary cruelty, a religious person may see an age-old ritual and an inspector of food-safety will see a risk to public health. In this way reaching agreement on facts, values and possible solutions will be extremely difficult. Furthermore, in trying to articulate their perceptions and value-orientations the actors will bring their “own mode of talking too” (Hajer 1995: 46). Actors may not only disagree with the concerns and value-orientations of others, it may well be that they don’t fully understand the very language in which other stakeholders articulate their points of view and that they fail to comprehend, let alone sympathise with, the deeper motivations for the other’s point of view.

Developing and agreeing upon public policies in situations in which these kind of “frame-controversies” play a role and in which problem-definitions cut across institutional spheres, is complex. Still, decision making cannot always be evaded and democratic ways of reaching some form of accommodation have to be found. Political theorists have developed normative models that comprise guidelines for ways to conduct public policy discussions and reach collectively binding decisions in these circumstances. Models of aggregative democracy will argue that in the end controversies can be solved through a majority vote, also if it may mean that the

perspectives and concerns of some groups will be excluded from the actual policy. Consensual models of democracy suggest that actors continue searching for a common framing of the policy issue until they are able to agree on the relevant facts and moral issues and subsequently base the policy on that. Deliberative approaches will invite actors to become “reflective” of the ways their orientations are being shaped by frames, to identify more fundamental and less important disagreements, to search for “second-order agreements”, and to be willing to adjust definitions of facts, values and interests during deliberations. Empirically it turns out another strategy is also available to bridge deep divergences through the forming of so-called “discourse coalitions”.

A discourse coalition is a group of actors that share a social construct and that can act upon a suggestion of commonality based on a superficial and metaphorical understanding which is produced and reproduced through the repeated evocation of the same crisp statement, catchy one-liner or analogy (Hajer 1995: 58ff.). These kind of crisp statements can be a comprised narrative or “story line”, for example a saying such as “what goes up must come down”, but is can also be shared sets of key concepts that can structure public policy responses, for example when a group of actors starts defining immigrants’ houses of worship as regular “neighbourhood facilities”.<sup>36</sup> The suggestion of common understanding suffices to create a discourse coalition and “the loss of meaning” is actually enabling because it allows “to create communicative networks among actors with different or at best overlapping perceptions and understandings” (Hajer 1995: 63). Discourse-coalitions can play a role in linking understandings and value-orientations emanating from distinct institutional sectors. They can help to interweave regulatory practices that stem from different policy fields and that may be rooted in different, and possibly even conflicting, understandings of situations and social processes. If these kind of discourse-coalitions begin to structure a particular issue-field they can inform strategies of regulation that are not based on congruent understanding of issues or on deep levels of normative agreements. This kind of co-operation and more shallow common understanding may sometimes be helpful and may open up possibilities of collective action that allow overcoming a deadlock. In addition, the phrasings and images that form the cement in discourse coalitions may progressively come to shape understandings.

The earlier mentioned example of the accommodation of ritual slaughtering may help illustrate the ways discourse-coalitions can provide a way out of situations of frame-controversies. Recent developments in accommodation policies around ritual slaughtering are attempts to regulate what is called the “market of religious products”. The use of the concept “religious products” has helped to create communicative networks to develop a new perspective in which unexpected overlaps of interests and concerns become possible and novel types of regulatory practices are introduced. In the aftermaths of the BSE-crisis new techniques were implemented to regulate consumer markets, trace the provenance of meat products and re-establish consumer trust through certification of products. Similar institutional arrangements have now been installed to regulate the production, distribution and consumption of *halal* products (cf. Bergeaud-Blackler 2007). This governance strategy builds upon, and in turn strengthens, an overlap in the

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36. Hajer (1995) uses the concept “story-line” as the general concept to refer to the kind of social constructs that can function as “the cement” in discourse coalition. However, it is not entirely clear whether and why discourse coalitions can only be formed around (aspects of) narratives or “stories” as this term seems to suggest. I will therefore avoid using the term “story-line” and simply speak of social constructs that can serve as the cement in discourse coalitions.

concerns of consumers of *halal* products, institutional actors concerned about food safety and organisations that are concerned about animal welfare. They can all agree that a good certification process is valuable, because it allows better monitoring of slaughterhouses and creates possibilities for respect of religious and animal-welfare proscriptions.<sup>37</sup> The institutionalisation of arrangements to regulate the production and distribution of *halal* meat “from farm to fork”, creates incentives for the formation of complementary institutions, for example supermarkets that specialise in selling “religious products” and that only collaborate with certified slaughterhouses. In this way the understanding of the policy-issue ritual slaughtering as being about regulating production and consumption of “religious products”, becomes increasingly plausible. Moreover, standards and ways of doing will spread as in a self-reinforcing manner, because the more people apply a norm the more it becomes taken for granted (Pierson 2004: 39). It is to this tendency of institutional arrangements to be self-enforcing that I now turn.

#### 1.3.4. Institutional logics and path dependencies

Institutions tend to inertia because they establish norms of appropriateness and encourage actors to associate new situations with existing ones and to continue practices simply because they are the ways things are done. Institutions also guarantee stability over time. The interpretative frames they generate and sustain are flexible enough to incorporate new observations, but they also guide perceptions by filtering out those aspects of reality that risk destabilising the social order. Interests and ideas of policy makers are thus being shaped by policy legacies. However, the reproduction of institutions over time and the self-reinforcing qualities of institutionalised arrangements is not merely a result of cultural or cognitive factors. In a more fundamental way institutions play a role in path-dependencies. These are social processes that generate “branching patterns of historical development” (Pierson 2004: 21).<sup>38</sup>

Institutions are subject to a dynamic of “increasing returns” and of “positive feedback”. This means that once a particular institution has been introduced it becomes relatively less costly to continue it than to replace it and that “outcomes in the early stages of a sequence feed on themselves, and once-possible outcomes become increasingly unreachable over time” (Pierson 2004: 21). Some actors will also have vested interests in maintaining institutions and those who have “invested” in an institution will resist change. An institutional arrangement may induce the forming of complementary organizational forms, “which in turn may encourage the development of new complementary institutions”. In this way path-dependent processes will develop at “a more macro level that involves configurations of complementary organisations and institutions” (Pierson 2004: 27; North 1990: 95). Well institutionalised regimes of government and their respective institutional logics will stretch out to a broad range of complementary institutions. In this way the earlier-mentioned underlying logics of polity forms can be said to have emerged, and subsequently to have begun informing governing strategies across all public policy institutions in a given society.

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37. This has also been observed by Bowen 2007: 1012.

38. History is inherently path-dependent because constraints from the past impose limits on current choices (North 1990: 137).

Because of the tendency of institutional arrangements to be self-enforcing and produce path-dependent patterns, the analysis of the regulation of relatively new social situations over time needs to be historically sensitive in two distinct ways. It needs to look at the particular institutional logics that are already in place within the institutional sector to which the regulation of that situation is being allocated in a given society. This means essentially that institutionalised regimes are analysed in view of the historical process of which they are the result. It is to be expected that institutional logics and actual patterns of regulation are being reproduced and that in a given society the ways things are regulated in the present often is an imitation of the ways things were regulated in the past. On the other hand, it means that the introduction and development of a particular institution and of particular strategies of governance are also analysed as processes that unfold over time. Institutional arrangements that are introduced will tend to be continued, choices made at a certain moment will affect possible choices at a later moment and the development of a pattern of accommodation of Islam shapes the development of subsequent patterns.<sup>39</sup>

Now that the relevance of the historical perspective has become clearer, the two institutional regimes that (for contingent reasons) have been of particular relevance in the formation of policies of accommodation of Islam in Europe can be further discussed. These are institutionalised church-state relations and regimes of government of national integration and immigrant incorporation. Institutional arrangements in the sphere of religion in France and the Netherlands can be described on the basis of existing church-state theories, many of which have also analysed the historical development of these institutions.<sup>40</sup> However, when it comes to analysing institutional arrangements in the sphere of immigrant incorporation and national integration, the existing typologies of country-specific institutional regimes cannot without further clarification be used for this study. As I have argued these typologies have been unable to take sufficient notice of the important variations within these national regimes both between different groups of immigrants and between different time periods. Existing typologies of regimes of integration and citizenship have been insufficiently historically sensitive and by consequence they have failed to explore, let alone explain, why the same countries have over time developed such widely diverging policies to incorporate different immigrant ethnic minorities (cf. Bader 1997: 1).

One step towards a more adequate view of this matter is to look at the way immigrant policies are crucially shaped by different types of host-stranger relations (Alexander 2006). Immigrants can be categorised and subject-positioned in various ways: as transient sojourners, seasonal workers, colonial workers, temporary guest workers, refugees, illegal migrants, denizens, ethnic minorities, newcomers, *alloctonen*, or citizens. These categorisations are fundamental for the emergence of particular institutional arrangements to incorporate ethnic immigrant groups and they have important consequences for the rights and entitlements of immigrants in the host society. There are three main subject-positions that have been attributed to Muslim immigrants in 20<sup>th</sup> century France and the Netherlands: the subject-position of colonial subject, guest worker and citizen. Following these three subject-positions three institutional

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39. Snap-shot views cannot capture the relevant factors that shape these processes. An example is given by Rath et al. (2001: 177 and 191) who speak of a “dominoes effect” in public policy development, meaning that Islamic institutions were set up and recognized in one social sphere after another. Gradual normalization and administrative acceptance of Muslim schools also made it easier for other Islamic institutions to be created.

40. See Monsma and Soper 1997; Fetzer and Soper 2005; Bader 2007a. The particular institutionalised regimes of the government of religion in France and the Netherlands will be elaborated in chapter 2.

regimes of incorporation of immigrant ethnic minorities can be distinguished: a colonial regime, a guest workers regime and a citizenship regime. All regimes of government are characterised by distinctive institutional logics that regulate the incorporation of immigrants and generate societal integration. These institutional logics will be further explored empirically in the course of this study, but the more general characteristics of the three regimes are already mentioned here.

The colonial regime developed within the model of geo-political organisation that was characteristic of modern imperialism. The empire was conceived of as an entity that encompassed a European heartland and its overseas territories. Different societies, cultures and peoples were joined together into a colonial order that was organised around the principle of superiority of European culture and the right of Europeans colonisers to rule over indigenous peoples and societies.<sup>41</sup> Among the more constant motives of colonial rule were the will of European countries to gain international prestige, to extract wealth from colonised territories and to civilize and modernise non-European populations. Colonialism can be understood as an institutional “regime of incorporation” because of the way it organised the integration of indigenous subjects and populations into a larger entity with its centre in Europe. It can also, more narrowly, be understood as a regime of incorporation for immigrants from the colonies who came to Europe to work or serve in the military. Colonial governing strategies and public policies to accommodate Islam and Muslim populations were developed dialectically between administrations in Europe and those in the overseas colonies and they were also shaped by contentious encounters with the colonised.<sup>42</sup>

The second institutional regime of incorporation of immigrants is the guest workers regime. Historically, it emerged as institutional arrangements in specific periods, for example in France in the 1930s and in various West-European countries in the 1960s. It was developed when governments and employers bound together to recruit a foreign workforce to provide for labour shortages in specific sectors of the national economy.<sup>43</sup> Guest workers were permitted to work in Europe on temporary work contracts and when there was no more work they were encouraged to return home and reintegrate in their society of origin. One of the guiding principles in a guest workers regime is differential exclusion, meaning that temporary immigrants can participate in some spheres of the host society while being excluded from others (Castles 1995).

The third regime of incorporation is citizenship, understood here as a particular institutional arrangement to permanently incorporate immigrant ethnic minority groups and create societal and political integration based on liberal-democratic principles such as freedom, inclusion and equality. Within the general type of a citizenship regime European liberal-democratic states have developed distinctive approaches to immigration and ethnic diversity. The familiar typologies of integration regimes can help to analyse these distinct institutional arrangements and distinguish for example between pluralist or multicultural and assimilationist regimes, and between different normative immigrant-integration policy-models.<sup>44</sup>

In the real world these three institutional regimes of incorporation do not exist in their ideal typical form, but only in the form of national variants. There are British, French, Dutch or

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41. See Said 1978 and 1993; and Loomba 1998.

42. See Clancy-Smith 1994; and Van der Veer 2001a.

43. See Freeman 1979; Cross 1983; Castels 1985; and Alexander 2006.

44. See Maussen 2006 chapter 3. Also Bader 1997 and 2007a: 193ff. This typology figures, sometimes in slightly different terms, in Entzinger 1984; Castles 1995; Jacobs 1998; Favell 1998; Koopmans et al. 2005; and Alexander 2006.

Portuguese colonial regimes, German, French or Dutch guest workers regimes and many types of citizenship regimes that function according to distinctive institutional logics. In addition, the national variants are internally heterogeneous and change over time, also because they are shaped in the interactions with the respective ethnic minority groups. I therefore choose the strategy of analysing the characteristics of each regime in a discussion of the historical development of the French and Dutch institutional arrangements and policies. For the moment the three-fold distinction of regimes of incorporation of ethnic minorities functions as an analytical grid and helps to more accurately focus on the role of specific institutional logics that shape public policy responses. The distinction between these three regimes also helps to more clearly delineate time periods in the development of public policy responses with regard to Islam in 20<sup>th</sup> century France and the Netherlands. It makes possible the analysis of the intersections between the respective regimes of incorporation of immigrant ethnic minorities and church-state regimes (see scheme 2).

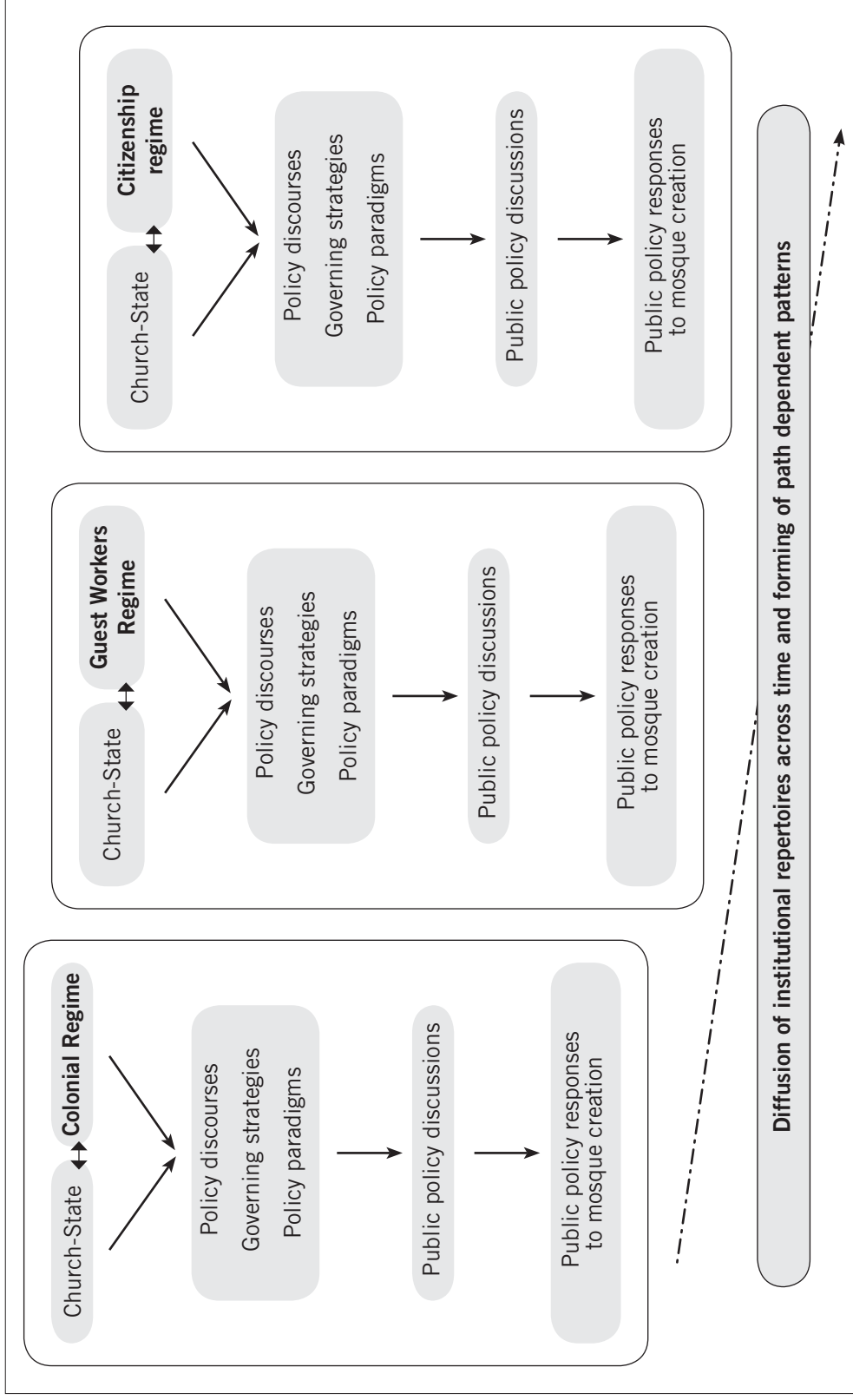
Distinguishing between three regimes of incorporation also allows us to see whether governing strategies and public policies developed within the framework of previously existing regimes of incorporation have continued to shape public policies at a later time. Of particular relevance are mechanisms of institutional diffusion. These comprise the ways institutional repertoires are being carried over from one setting to another (Koenig 2005: 230). I will look at the ways institutional repertoires are being diffused geographically, for example from colonial societies to Europe and vice versa, and at the ways institutional repertoires have been diffused across time, most importantly between the different regimes of incorporation. Mechanisms of diffusion of institutional repertoires can be cognitive and cultural. In that case specific interpretative schemes, representations and understandings are being imitated, reproduced and employed within a different institutional environment or within a different period. Specific people may serve as “carrier groups” for this kind of cognitive and cultural diffusion and bridge different institutions and periods (Koenig 2005: 231). Mechanisms of diffusion can also be institutional. This is the case when institutions are maintained in different circumstances or when the same type of institutions is set up, for example a specific facility for the housing of workers or a public policy to enable immigrants to maintain their cultural practices. The focus on continuities and discontinuities and the relevant mechanisms of diffusion will also help to establish whether for historical and structural reasons the situation of Islam and Muslim populations in some West European is indeed different from that of other immigrant-origin minority religions, and whether there are significant differences in that respect between France and the Netherlands.

### **1.3.5. Case-study approach and public discussions on mosque creation**

It is now possible to return to the logic of focussing on the issue of mosque construction as a suitable means for exploring the theoretical issues discussed above. The creation of prayer spaces has been among the key concerns of Muslims in Western Europe and houses of worship make a claim on space, even though the actual ways they do – geographically, socially and symbolically – can vary greatly. Given the paths of European history, throughout the 20<sup>th</sup> and 21<sup>st</sup> century the building of mosques in France and in the Netherlands remained something out of the ordinary. The development of public policy discourses on mosque creation was one aspect of making the presence of Islam meaningful and finding appropriate ways of accommodating what was often seen as one of its central institutions. By studying public policy discussions on mosque creation this study aims to gain understanding of the wider social process of Western European societies



**SCHEME 2 – Institutionalised regimes of government, levels of structuration of public policy responses to mosque creation and path dependencies**



*The arrows indicate directions of processes of structuration and shaping of public policy responses. Feed-back processes are not included in the mode.*

seeking to regulate the incorporation of Islam and Muslim immigrant populations. The theoretical framework outlined above suggests that, in the realm of public policy making, French and Dutch societies define and experience the “reality of mosque creation” via discourses that are associated with institutionalised regimes of government and governance. These institutionalised regimes build up to an – internally plural and negotiated – institutional order that is seen as both meaningful and legitimate. However, institutional regimes and the wider institutional order in a given society do not merely “exist”. They are products of human history, but they are also meaningful and negotiated orders that can be challenged as well as justified, that are resilient as well as adaptable. Seen in this light, public policy discussions on mosque creation bring into focus the politics of the meaningful incorporation of Muslim populations and Islam in France and the Netherlands, and the ways these societies have changed in the process.

#### **1.4. Public policy responses and the creation of mosques in France and the Netherlands: a comparative case study**

The selection of France and the Netherlands for this comparative study is appropriate because it guarantees important variations at the level of the institutional arrangements that have been identified as relevant, being on the one hand distinctive regimes of incorporation of ethnic immigrant minorities (regimes of colonialism, guest workers and citizenship) and church-state regimes. The French colonial regime and its “mission to civilize” has often been contrasted to the Dutch colonial model of indirect rule and priority for economic gain and commerce. The French regime of citizenship and national integration and its emphasis on Republicanism and cultural assimilation is repeatedly contrasted to Dutch pluralism and multicultural integration policies. French church-state institutions that are organised around the principle of *laïcité*, are seen as crucially different from the Dutch regime with its heritage of pillarisation. Only in the case of the guest workers regime the literature does not provide a clear idea about possible institutional differences between the countries. Whether or not these crude images of national regimes correspond to the institutional logics that characterise the various institutionalised patterns of government and whether these and *other* logics come out in effective public policies will be discussed in the course of this study.

A comparison between these two countries is also pertinent because both have in the past been important imperial powers that ruled over Muslim societies. They both have incorporated significant Muslim immigrant populations over the past 30 years. At present, statistics estimate that roughly five to seven percent of the total population of France and the Netherlands stems from immigration from Muslim countries.<sup>45</sup> An important difference in this respect is that many Muslims in France originate from the former French colonies, whereas in the Netherlands the majority of Muslims are of Turkish or Moroccan origin. Whether that difference is relevant for the impact of the institutional and policy legacies of the colonial regime upon subsequent regimes of incorporation will be discussed in the course of this study.

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45. See OSI/EUMAP 2007 country reports on France and the Netherlands. Available at: [http://www.eumap.org/topics/minority/reports/eumuslims/background\\_reports](http://www.eumap.org/topics/minority/reports/eumuslims/background_reports), extracted March 24 2008.

The study corresponds to a “most different cases” research design. It explores whether the above mentioned differences in institutional arrangements have resulted in distinctive accommodation policies, and, if so, how and why. However, my aim is to explore institutional arrangements in light of their historical development and internal heterogeneity and thereby to develop more adequate models of country-specific regimes of incorporation of immigrant ethnic minorities and church-state regimes. I focus on “inductive generalisation” and seek to identify distinctive institutional patterns and causal mechanisms in social processes that are complex and that are also shaped by several situational factors (Bader 2007b: 876). This means that my qualitative description of the ways distinctive institutional regimes shape the formation of public policies of accommodation of Islamic presence will be historically sensitive, detailed and contextual. It will be historically sensitive by analysing the ways institutional regimes of incorporation and church-state as themselves historical products, consisting of various elements and traditions, and because I study the development of accommodation policies towards Islam as one internally extremely heterogeneous, social process that *unfolds over time*. My approach will be detailed because it focuses on a particular issue – policy discussions around mosque creation – and therefore in particular analyses those elements of institutional regimes that are most relevant for this issue. I will, for example, in more detail describe those aspects of church-state regimes that are most relevant with regard to the creation of houses of worship, which is notably the issue of state subsidies for building and maintenance costs. This also means that because many aspects of mosque creation are dealt with at the municipal level I will focus in particular on the specific public policy discussions in Marseilles and Rotterdam. Both these cities have been at the frontline of debates on Islam in their respective countries, and they are home to substantial Muslim populations. I should hasten to add that Rotterdam and Marseilles are not claimed to be representative for the wider approaches in the Netherlands and France. National regimes of government structure important aspects of the formation of public policies in those cities, but other institutional arrangements that are relevant for accommodation policies with regard to mosques will come into play at the local level, such as town planning regulations and municipal approaches to immigrant integration (see scheme 3).

A larger number of case-studies in both countries would have allowed for firmer conclusions on the distinctive relevance of national as opposed to municipal institutional regimes and wider governing strategies, but this would have come at the cost of the more detailed historical analysis and the interpretative study of actual policy discussions. Finally, my approach is contextual because institutional arrangements, governing strategies and public policy discussions are situated within their wider historical and political context. That context inevitably includes situational factors, which should not be abstracted away in order to test theoretical models. Situational factors include significant events, such as the terrorist attacks of 9/11, and broader conjunctures and trends, such as shifts in public opinion, integration processes and political developments (Bader 1991: 326ff.). In addition, a contextual analysis also means that the focus lies on the ways legal and constitutional regulations, policy frames and policy guidelines and normative ideas are being interpreted and applied in social practices and in view of acts of regulation.

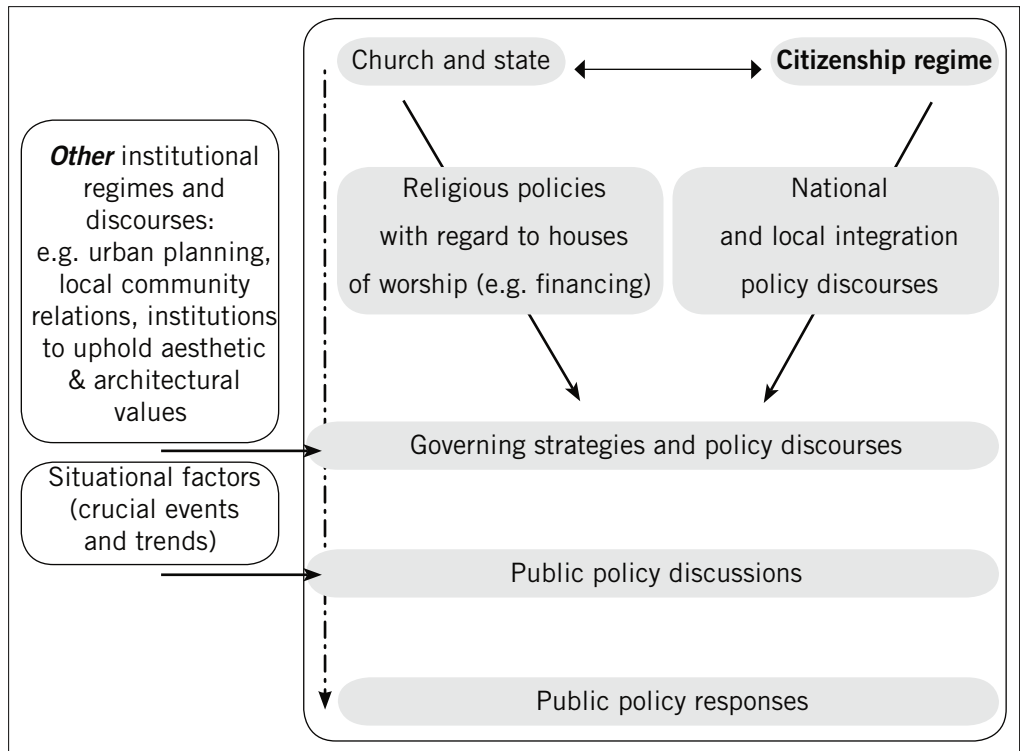
To summarise, the leading research questions of this study are:

1. How have institutionalised regimes of government of incorporation of ethnic immigrant minorities and of church-state relations shaped accommodation policies with regard to the founding, development and functioning of mosques in France and the Netherlands, and what important variations are there in this respect?

2. In what ways did public policy discussions around mosque creation develop over time in 20<sup>th</sup> and 21<sup>st</sup> century France and the Netherlands, and in particular in Marseilles and Rotterdam, and what particular meanings were given to (aspects of) institutional arrangements in varying, internally heterogeneous and competing policy discourses?
3. In what ways are institutional logics and interpretative schemes diffused from one institutional setting to another and/or from one institutional regime of incorporation of ethnic immigrant minorities to a subsequent regime, and what are the effects thereof for the development of path-dependent patterns and policy legacies shaping public policies with regard to the presence of Islam and mosque creation in France and the Netherlands?<sup>46</sup>

Two aspects of the processes of argumentation and representation around mosque creation in the Netherlands and France, and in particular in Marseilles and Rotterdam, will be of central

**SCHEME 3 – Institutionalised regimes of government shaping (local) public policy responses to mosque creation within citizenship regime**



*The arrows indicate directions of processes of structuration and shaping of public policy responses. Feed-back processes are not included in the model.*

46. Please note that this study does not include the analysis of the diffusion of institutional logics and interpretative schemes from one national context to another. As Koenig (2007) has demonstrated trans-national institutional processes and mechanism of diffusion of repertoires in Europe play an important role in shaping policies of accommodation of Islam. I thank Ralph Grillo for bringing this to my attention.

relevance. From one perspective, the ways mosque creation and the functioning of mosques are being associated with prevailing ideas, institutionalised regulatory practices and public policies concerning the incorporation of immigrant ethnic groups. From another, the ways public responsibilities with regard to mosque creation are being defined and whether or not institutional church-state arrangements are made to be relevant and to what consequences.

Public policy discussions on mosques comprise all kinds of different forms of speech and text around the creation and functioning of Islamic houses of worship. This study is therefore based on an analysis of a very heterogeneous dataset that included newspaper clippings, policy memorandums, transcripts of municipal hearings and information evenings, qualitative interviews, political speeches and pamphlets, mosque building project descriptions and television broadcasting. The internal diversity of the dataset further increased because this study covers a time frame of more than a century. As a result I have had to rely on secondary sources and fragmentary archival material for some periods, whereas for other periods documentation was more readily available. In addition, the arena's in which mosque creation was discussed varied largely, both across time and between the two countries and cities. Sometimes mosque creation is discussed in written media, for example in national and local newspapers, at other times policy makers produce extensive policy memoranda outlining a municipal approach to the housing of mosques, while sometimes there is hardly any public discussion on mosques. In the face of such a diverse data set any attempt at quantified analysis is bound to fail. I have therefore chosen to analyse the data in an interpretative way and to gradually develop my conceptualisations and categorisations in a series of readings of the material.<sup>47</sup> Thereby I have sought to always understand discussions in light of their wider historical, political and policy context and key situational factors. Of crucial importance in that process was the study of different phrases and figures of speech that pointed to specific framing of mosque creation. The example of the analysis of the fragment of an editorial published in *Le Monde* below gives an impression of the way I have carried out the interpretative analysis of the data.

In the following chapters I discuss the findings of this study. In chapter 2 I introduce French and Dutch church state regimes in a historical perspective and pay in particular attention to the regulations for the financing of houses of worship. The other chapters are organised following the different regimes of incorporation. Chapter 3 and 4 discuss French and Dutch colonial regime and chapter 5 and 6 do the same for the guest workers regimes. In chapter 7 and 8 I discuss the results of the more in depth analysis of policy discussions in Marseilles and Rotterdam that took place within the citizenship regime and shifting concerns about immigrant integration and Islam in both countries. In the chapter 9 I draw the main conclusions from this study and compare the two countries in light of the research questions introduced above.

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47. For a discussion of the methods of interpretative policy analysis see Yanow 1996.

#### SCHEME 4 – Illustration of interpretative analysis of texts

<p><b>Text-fragment</b>  <b>Newspaper:</b> Le Monde  <b>Date:</b> March 10 2001  <b>Text type:</b> Editorial</p>	<p>“is it admissible that the worshippers of <u>the second religion in France</u>, Islam, are <u>still</u> forced to pray in houses of worship that are too small and uncomfortable? And that the Muslims (...) spread out their prayer rugs <u>on the pavement</u> of our cities ? (...) the incorporation of a ‘<u>Cathedral-Mosque</u>’ in the urban landscape stimulates the integration of Muslims, many of whom have <u>French nationality</u>. Because, beyond the needs of the worshippers, the establishment of a Grand Mosque is <u>first and foremost a symbol</u>: it represents the integration and the recognition of Islam”</p>
<p><b>Labeling, key terms, figures of speech</b></p>	<p>Muslims/Islam as second religion in France  Our cities  Incorporation in the urban landscape  Muslims with French nationality  A Symbol</p>
<p><b>Definitions of problems and solutions</b></p>	<p>(problem) Inadequacy of prayer space  (problem) Worshipping on the pavement  (problem) the situation is still problematic  Integration of Muslims (solution)  Grand Mosque represents “integration and recognition” (solution)  “needs” are a problem, but beyond that there is the symbolic issue of recognition (unclear whether this is a demand of Muslims, who wants “recognition”?)</p>
<p><b>Representations of mosques and Islam</b></p>	<p>Houses of worship: too small, uncomfortable  Praying “on the pavement”  Cathedral Mosque  Grand Mosque  A symbol (of integration and recognition), providing for “needs” is secondary</p>
<p><b>Framing in light of public issues and responsibility</b></p>	<p>Rhetorical question: it is not admissible in “our cities” that Muslims who “have French nationality” and who “belong to the second religion in France” have to worship on the pavement and in inadequate conditions (i.e. this calls for action)  A Cathedral Mosque can be incorporated into urban landscape: (implicit) helps to address needs, but (emphasis) is a symbol of integration and recognition: (i.e. public responsibility is focused on the latter issues, leaves open whether the creation of this symbol of integration and recognition is or should be initiated by French (authorities, society) or in reaction to Muslim demands</p>