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Limits of European Islam: Turkish Islamic Organizations' Responses to Host Country Policies in France and Germany

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Abstract

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Abstract: Through an analysis of three key Turkish Islamic umbrella organizations operating in France and Germany, this report discusses how Turkish Muslims practice, redefine, and respond to citizenship, integration, and church-state policies engineered by host states. Relying on a detailed examination of governmental and organizational publications, media reports, and semi-structured in-depth interviews conducted with organization leaders as well as French and German policy-makers, this study draws attention to the gap between normative legal rights reserved for Muslims and their implementation in practice. While the existing literature provides mixed conclusions with respect to the accommodation of Muslim religious rights in France and Germany, I argue that the Turkish Islamic organizations are more critical of host state policies in Germany than in France. First, even though the constitutional setting demands a strict separation of state and religion in France, in reality, rules are relaxed in a way to provide benefits to Muslim groups. In contrast, while the constitution is more liberal in Germany, this flexibility has not led to accommodating policies in practice. Moreover, for Turkish

Muslims in both France and Germany, the French Council for the Muslim Faith is regarded as a more legitimate and democratic institution. The German Islam Conference, on the other hand, is criticized for excluding important Islamic organizations, creating a distinction between "good Muslims" and "bad Muslims," and placing more emphasis on security and terrorism in its working groups. Germany's federal system, and its excessive state intervention in theology institutes and Islamic religious courses are other factors that shape how Turkish Muslims respond to, and interact with policy-makers in their host countries.

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I. Introduction

Large-scale Muslim migration to Western Europe began in the aftermath of the Second World War, supplying low-skilled workers needed for rebuilding Europe's devastated economies. The economic decline of the 1970s led to a downsizing of the number of low-skilled laborers. With the introduction of expansive policies on family reunification and political asylum, however, the Muslim population in Europe rose again in the 1980s and 1990s (Messina 2007). Over time, as European policy-makers have come to the realization that the Muslim migration is not a passing phenomenon, the incorporation of Muslims into the political, economic, and social structure of European societies has become one of the most important policy questions faced by Europe today.

The majority of Muslim migrants in Western Europe emigrate from Turkey. This study focuses on France and Germany because they not only host the largest Muslim populations in Europe, but also are the most popular emigration destinations for citizens of Turkey. In both France and Germany, which experienced mass migration when they were already fully developed national states, the large-scale immigration of Turks began in the 1960s with the guest-worker programs (Freeman 1995). The rules for admission were similar in these two countries. After the recruitment period ended in the mid-1970s, however, France adopted restrictive migration and citizenship policies, while Germany introduced a relatively open asylum policy (Weil 2008, Kaya and Kentel 2005). Today, it is estimated that out of France's 3.5 million Muslims, some 459,000 are Turkish (Institut national de la statistique et des etudes économiques 2012, Pew Research Religion and Public Life Project 2011). In France, the majority of Muslims are of North African descent. Of Germany's 3.8-4.3 million Muslims, the Turkish population numbers around 2.5 million (Deutsche Islam Konferenz 2014), making it the largest Muslim community in the country.

These host countries constitute ideal cases to compare also because of their contrasting political structures: Germany is a federal republic, whereas France is a unitary state. Moreover, they have different institutional patterns of citizenship, integration, and

church-state policies. More specifically, France is a Catholic-dominated country, while Germany blends Catholic and Protestant traditions. Even though both countries are going through a secularization trend characterized by declining church membership, and religion's shift to the private sphere, there are still significant differences between them. Specifically, in France, there is a strict church-state separation, whereas Germany has a *de facto* religious pluralism, which paves the way for collaboration between the state and certain religious communities (Fetzer and Soper 2005).

In terms of integration policies, migrants in France have better access to individual legal equality and anti-discrimination protections, while Germany grants migrants relatively limited access to individual citizenship rights (Ersanilli and Koopmans 2011). The Migrant Integration Policy Index (2014), however, reports that Germany's overall integration policies are more favorable than those of France. While some scholars have claimed that France has been less accommodating than Germany to the religious needs of Muslims (Fetzer and Soper 2005), others have found that Germany ranks higher than France with respect to citizenship rights (the ICRI Religious Rights for Muslims Index in Koopmans, Michalowski, and Waibel 2008, Carol and Koopmans 2013).

Given that the existing literature provides mixed conclusions as to which country treats Muslims better, the goal of this study is to examine how Turkish Muslims living in France and Germany perceive, respond to, and interact with host country policies and policy-makers. In doing so, this paper reassesses the ability of European governments to influence Muslim groups. By pointing to the difference between how policies are designed and how they are applied in practice, this study aims to go beyond state-level dynamics, and provide a multi-faceted analysis. I argue that the Turkish Islamic organizations in Germany are more critical of host state policies than in France as Germany has not extended important privileges to Muslim groups. Muslim leaders also criticize Germany's excessive state intervention in religious affairs, its federal structure, and emphasis on security and terrorism concerns.

The focus of this paper is on the three most important and largest Turkish Islamic umbrella organizations operating in France and Germany: 1) The Turkish-Islamic Union for Religious Affairs (DITIB)—a branch of Turkey's Directorate for Religious Affairs (Diyanet) representing "official" Islam, 2) Milli Görüş (The National Vision)—a political Islamic movement espousing the Islamic faith and dawa, and 3) the Union of Islamic Cultural Centers (Süleymancılar)—an apolitical and mystical Islamic community that focuses on strict Islamic training. The scope of this study is limited to these organizations because they have each served as bridges between host states and the Turkish Muslim population through their participation in the German Islam Conference (DIK) and the French Council for the Muslim Faith (CFCM). Focusing on Islamic umbrella organizations is essential because as the de facto representatives of Islam in Europe, they constitute the most important claims-making actors (Carol and Koopmans, 2013). Furthermore, Islamic organizations have become especially important players in the wake of the "Islamization" of migration since the 9/11 attacks (Tietze 2008).

This analysis employs a detailed examination of governmental and organizational publications and media reports derived from online resources and printed publications. In addition, semi-structured in-depth interviews are conducted with Secretary Generals, spokespersons and executive board members of Turkish Islamic umbrella organizations, and French and German policy-makers. This paper seeks to make an empirical contribution to the existing large-scale surveys, such as the EURISLAM study, which lack rich data and in-depth interview material. The EURISLAM reports, for instance, rely on interviews conducted with six Islamic organizations in France, only two of which are Turkish organizations. As a consequence, France was removed from the EURISLAM analysis (EURISLAM Integrated Report on Interviews with Muslim Leaders 2011). Moreover, the literature lacks a cross-country comparison on how the "European Islam" project reaches Turkish Muslim organizations, and how and why Turkish Muslims' assessment of France and Germany's policies differs. By conducting interviews with Islamic associations, my goal is to gain a deeper understanding of these organizations' political, financial, and cultural ties to host state governments as well as their perceptions,

behaviors, and claims-making activities. Conducting interviews with European bureaucrats and the representatives of the Islam Councils in France and Germany is also critical to advancing the understanding of how European policy-makers interact with the Turkish Islamic associations.

The following section reviews how France and Germany have been compared in the existing literature with respect to their citizenship, integration, and church-state policies. Next, I provide a comparison of the Islam Councils established in France and Germany to show how host countries differ in institutionalizing and domesticating Islam. Drawing on original data, my paper concludes with a discussion of how three Turkish Islamic organizations have responded to host country policies in France and Germany.

II. The Comparison of Citizenship, Integration, and Church-State Policies in France and Germany

The political opportunity structure framework (Brubaker 1992, Guiraudon 1998, Thränhardt 2000; Koopmans and Statham 2000, Hansen 2002, Koopmans et al. 2005) contrasts states with very different citizenship and nationhood configurations, arguing that the institutional dimensions of a state define the available channels of access for Muslims. Differing national citizenship models explain variations in migrants' political claims-making. The most significant institutional variables are the migrants' legal, social, economic, and political rights, and the host society's citizenship laws and naturalization procedures (Ireland, 1994). While the political opportunity structure framework enables scholars to compare different countries on the basis of their institutional reactions to Muslims' concerns and demands, this approach does not acknowledge the historical context that links church and state to one another. Therefore, as Fetzer and Soper (2005) emphasize, the political opportunity structure framework should be accompanied by a detailed analysis of church-state relations.

Other scholars have called into question the relevance of the categories of church and state to actual policy outputs (Minkenberg 2003, Amiraux 2004) by arguing that the realities of local politics may sometimes hinder the implementation of laws. Others have shown that European states have adopted similar strategies to interact with their Muslim communities to end the "outsourcing" of Islam and the intervention of foreign states despite their differing church-state dynamics and historical trajectories (Laurence 2012, 157).

In comparing the citizenship configurations of France and Germany, France is categorized under a universalist form of citizenship, which is amenable to individual access to equality yet characterized by culturally monist group rights. Even though the 1981 Liberalization of Association Law that permitted migrant organizations based on ethnicity and religion was a brave move towards a culturally pluralist conception of citizenship, this positive trend has not gone much further (Koopmans et al. 2005, 14).

On the other hand, scholars have placed Germany under an assimilationist citizenship model, which is defined by less favorable individual access to equality yet culturally pluralist group rights (Koopmans et al. 2005, 10). In Germany, since the adoption of the 1913 **Empire** and Citizenship Law (Reichs-und-Staatsangehörigkeitgesetz), an ethno-linguistic concept of citizenship based on jus sanguinis gave shape to the German citizenship regime (Brubaker, 1992). Germany's reluctance to grant naturalization based on legal discretion handicapped migrants' political participation in trade unions as well as in local and national political bodies.

The coalition between the Social Democrats (SPD) and the Green Party formed in 1998 presented a historical opportunity for Germany's migrants. Policy-makers acknowledged Germany's status as an immigration country and agreed to transform the country's citizenship and naturalization legislations in a way to replace *jus sanguinis* citizenship concept with the *jus soli* conception of citizenship (Didero 2013, 39). This citizenship reform came in 2000, making the children of migrant citizens and permanent residents eligible for German citizenship at birth irrespective of whether or not they possess German ancestry. Integration, not ethnicity, has become the focal point of German identity, exemplified by a verbal shift from "Foreigner's Policy" (*Ausländerpolitik*) to "Integration Policy" (*Integrationspolitik*) (Hinze 2013, 3). Thanks to this positive transformation, some scholars argue, Germany now ranks higher than France with respect to citizenship rights (Koopmans, Michalowski, and Waibel 2008).

Table 1. Average Scores and Rankings of Countries on Citizenship Rights

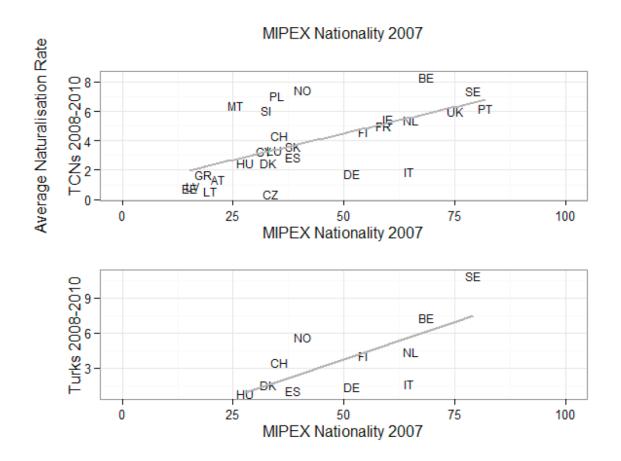
	1980	1990	2002	2008
Sweden	.27 (1)	.31 (2)	.48 (1)	.51 (1)
United Kingdom	.18 (2)	.22 (3)	.43 (3)	.44 (2)
Netherlands	17 (5)	.33 (1)	.47 (2)	.40 (3)
Belgium	22 (7)	13 (6)	.19 (5)	.34 (4)
Norway	11 (4)	06 (5)	.21 (4)	.12 (5)
Germany	54 (9)	49 (9)	11(7)	12 (6)
France	18 (6)	14(7)	16 (8)	15 (7)
Denmark	09(3)	02 (4)	10 (6)	17 (8)
Switzerland	60 (10)	57 (10)	31 (10)	30 (9)
Austria	47 (8)	42 (8)	18 (9)	30 (10)
Average	19	10	.09	.08

Note.—Higher scores indicate more inclusive policies. Countries are listed in the order of their degree of inclusiveness in 2008. Figures in parentheses indicate rank orders.

Source: Koopmans, Michalowski, and Waibel (2008, 1226)

Despite positive developments that facilitated naturalization procedures, migrants have heavily criticized a newly implemented language and knowledge test. Moreover, the amended citizenship law did not offer Turks a comprehensive framework for dual citizenship. It has been found that 16 percent of all Turkish citizens who naturalized between 2004 and 2007 were allowed to retain their Turkish citizenship (Naujoks 2012, 5). The number of naturalized citizens with Turkish origin was 43 percent of the total in 2001, and it dropped to 25.5 percent in 2007 (Pierobon 2010, 15). The naturalization procedures in Germany have a bad reputation for its bureaucratic hurdles. This may be one reason that Germany and Switzerland have lower levels of naturalization than France, Britain, and the Netherlands (Koopmans et al. 2005, p. 39). The study conducted by the Federal Office for Migration and Refugees shows that the number of naturalized German Turks has annually dropped from 103,900 in 1999 to 33,246 in 2012 (Bundesamt für Migration und Flüchtlinge Migrationsbericht 2011). On the other hand, France has shown a rather stable increase in naturalization rates over the past several years (Eurostat 2011, Reichel 2012).

Figure 1. Average Naturalization Rates for Third Country Nationals and Turks



Source: Reichel (2006, 16)

In France, children born to foreign parents automatically become French citizens unless they inform the officials that they do not want to hold French citizenship. Naturalization procedures are also less compelling than in Germany. Moreover, France provides the most comprehensive protections for resident foreigners against expulsion. With respect to anti-discrimination, France is reported to have a better record than Germany, as Germany's legislation addresses only the most extreme forms of racism and does not comply with the EU anti-discrimination directive (Koopmans et al. 2005, 49). A more extensive anti-discrimination law finally came into effect in 2006. Germany has

still been criticized for delaying the ratification process of four EU anti-discrimination directives adopted between 2000 and 2004 (Rosenow-Williams 2012, 119).

When it comes to claims-making, several scholars have contended that French Muslims make group demands that seek a degree of recognition of both Islamic values and values within the understanding of allegiance to the French nation. When they make demands, this is usually to defend their group against the state's public enforcement of *laïcité* along the lines of *Islam de France*. In France, policies and public discourse revolve around the individualized category of *immigré* because the republican tradition demands the subordination of particularistic identities to the allegiance to the French nation (Koopmans et al. 2005, 125). Muslims in Germany, on the other hand, make claims based on their ethnicity and nationality rather than their religion. This is due to German assimilationist policies and public discourse that have strived very little to turn migrants into citizens (Koopmans et al. 2005, 241). Carol and Koopmans (2013) find that the strength of Muslims' voice in public debates varies from approximately 20 percent in Germany, and 46 percent in France. In Germany, the tone of the public debate on Islam is more negative compared to other European countries, and discussions are mostly set from above (Helbling et al. 2010, EURISLAM Survey 2011).

The share of voters of first and second-generation migrant origin among the national and local electorates is also much higher in France than in Germany (Koopmans et al. 2011). Furthermore, the feeling of acceptance of migrants as fellow citizens is highest in France across Europe (EURISLAM Survey 2011). As Phinney et al. (2001) report, Turks identify most with their country of residence in France and the Netherlands, and least in Germany. These scholars also point out that the highest national language proficiency among migrant youth is seen in France alongside with the U.K. and the U.S., however Germany stands in between. Ersanilli (2010, 60) also finds Turks in France have somewhat more interethnic contacts than those in Germany. The fact that Germany is reluctant to grant dual citizenship to Turks creates resentment and alienation from Germany.

With respect to the accommodation of religious rights, Koopmans et al. (2005, 156) have found that France grants less political space for religious differences in the public sphere than either Britain or the Netherlands. Likewise, Fetzer and Soper (2005) argue that France has caused more hardship for Muslims in comparison to Germany because the practice of religion in the public sphere is seen as a challenge to *laïcité*. In France, a strict church-state separation has prevented the state from intervening in religious affairs and funding or cooperating with religious communities. Its *laïc* regime requires France not to recognize or subsidize any religion, as stated in Section II of the Act of 9 December 1905. Accordingly, France does not grant any special legal status to any religion. Minority identity is seen as an illegitimate ground for making claims directed at the state and voting along lines of religious identity has been limited in France. Thus, several scholars have argued that political mobilization within the French political system has been especially difficult for French Muslims (Maxwell 2010, Parvez 2013).

Table 2. State Accommodation for Muslims

	Accommodation	Resources	Structures	Ideology	Church-state
Britain	High	Low	High	High	High
France	Low	High	Low	Low	Low
Germany	Medium	Medium	High	Low	Medium

Source: Fetzer and Soper (2005, 147)

A more recent study (Carol and Koopmans 2013), however, shows that Germany's accommodation of Muslim religious rights is more inclusive.

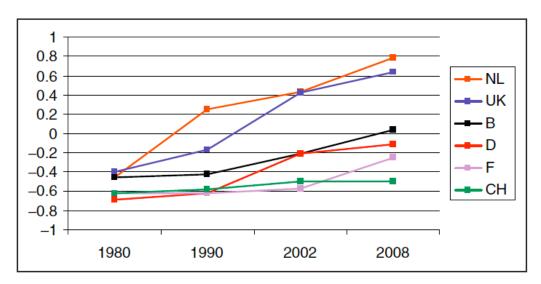


Figure 2. Accommodation of Muslim Religious Rights

Source: Carol and Koopmans (2013, 173)

In France, religions can be represented by organizations in two ways. First, Muslims are entitled to establish associations under the 1901 Act, which refers to the freedom of association as a fundamental public right. According to this Act, organizations can be freely formed by obtaining legal personality through mere declaration, and can only be abolished under limited circumstances related to offences against public policy. However, in practice, certain relaxations are allowed. For instance, under specific conditions, associations forged under the ordinary law of associations governed by the 1 July 1901 Act can be categorized as "public utility" associations, and can receive tax benefits (Basdevant-Gaudemet 2004, 60). Foreign associations were long prohibited due to specific legislation that required prior authorization for foreign associations. The Act of 9 October 1981, however, abolished this requirement. After this modification, a plethora of Islamic organizations were founded with religious, cultural, charitable, and educational goals. Like any organization covered under the 1901 Act,

Islamic organizations can apply to public authorities for subsidies for cultural and other activities. Legally, they can only receive hand-delivered gifts with no tax benefits. Significant tax exemptions, however, are granted on goods as long as the organization is recognized as a "public utility" association (Basdevant-Gaudemet 2004, 60-61).

Second, the 1905 Act allows denominational groups to form religious associations. The organization should have a solely religious purpose, and should not receive any subsidy out of public funds according to Section 4 of the Act of 9 December 1905. In practice, however, they benefit from tax exemptions when they receive donations if they claim the practice of religion and the French state openly recognizes their status as a religious association. As soon as its charter is prepared, an organization can declare itself as a "religious" association. The authorities, however, ultimately decide if the association can benefit from the tax exemptions granted to this category of association (Basdevant-Gaudemet 2004, 59-61).

In France, mosques, prayer rooms, and cemeteries must abide by the Town Planning Code regulations. The 1905 Act prohibits all public subsidies for the creation of religious buildings. Therefore, places of worship are supported through donations. According to this law, municipal councils are authorized to decline or permit the construction of mosques and the purchase of land (Basdevant-Gaudemet 2004, 69-70). In France, mosques can be built with minarets. The Islamic scarf controversy (*l'affaire du foulard*) became one of the most contentious debates for Muslims when the wearing of the headscarf, along with the Jewish kippa and large Christian crosses, were prohibited in 2004 by the French law on secularism and ostentatious religious symbols at school. The law prohibiting clothes covering the full face, such as *burqa* and *niqab*, came into force in 2011 (Bowen and Rohe 2013, 153).

Contrary to France, the German legal system is very liberal when it comes to providing freedom for the practice of religion, including Islam. As the Federal Ministry of the Interior underlines, "Germany is a secular state and does not have a state religion" (Bundesministerium des Innern 2005). Religious freedom and public law are discussed under Article 4 and its Sections 1 and 2 of the German Basic Law. This Article notes that

"[f]reedom of faith and conscience, and freedom to profess a religious or philosophical creed, shall be inviolable" and "[t]he undisturbed practice of religion shall be guaranteed" (Rohe 2004, 86). Moreover, Section 3 of Article 3 stipulates that no one may be discriminated against, or given preferential treatment, for reasons of their religious belief. In Germany, religious communities in general are not recognized. Under the legal provisions on civil associations, the preferable forms of organizations can be chosen, and organizations are capable of holding and exercising legal rights. The same regulation is valid when forming organizations under private law. German constitutional law on religious organizations (ecclesiastical law) makes provision for many different types of cooperation between the government and religious communities in the public sphere, including religious instruction at public schools and the provision of social welfare services (the DIK Conclusions of the Plenary Held on 17 May 2010, 3).

Since German law does not provide a broad system of legal recognition of religious communities, each group can choose the form of organization it prefers, and acquire legal rights on this basis (Rohe 2008, 57). The Weimar Constitution introduced the law governing the relationship between church and state (Staatskirchenrecht), which entailed a special form of organization for religious communities called Körperschaft des öffentlichen Rechts (Status of Corporation under Public Law). As Article 140 of the German Constitution adopted Articles 136, 137, 138, 139, and 141 of the Weimar Constitution, the religious communities operating at the time of the enactment of the 1949 Constitution, including Evangelical, Catholic, and Jewish communities, automatically received the status of corporation under public law (Rosenow-Williams 2012, 107). Other foundations meeting certain specific criteria regarding the permanency of their activities and the size of their members can also apply for this status. While jurisdiction for this issue area lies within the authority of federal states, one of the requirements is that the community must have been in existence for 30 years. So far, 26 Christian organizations and several Jewish communities possess this status: no Muslim groups have yet met this requirement (Rohe 2004, 86-87; Rosenow-Williams 2012, 107).

The status of corporation under public law is different than the

Religionsgemeinschaft (Religious Community) status. The latter is a term used by the German constitution with regard to areas of cooperation between the German state and religious groups in the public sphere. Religious associations recognized as a religious community can provide religious education in public schools under the monitoring of regional states (Länder). This status is narrower than the Körperschaft des öffentlichen Rechts status, which enables religious organizations to enjoy public rights to the same extent as Christians and Jews. These rights include levying taxes, administering business in an autonomous way, deciding upon the composition of religious instruction, opening religious places, and being represented in public institutions and broadcast-councils (Mustafa Yeneroğlu, IGMG spokesperson, personal communication, Cologne, November 2013).

In Germany, mosque construction and religious clothing have been a less controversial issue than in France. Local authorities in large German cities, including Berlin, Cologne, and Frankfurt, have allowed the construction of large, traditional-styled mosques (Fetzer and Soper 2005, 119). The construction of places of worship is devised under the German law of planning and construction, and according to the constitutional guarantees of religious freedom. The German law of planning and construction requires that the shape of places of worship suit the given surrounding (Rohe 2004). Regarding the wearing of the headscarf, as of 2006 many German federal states had enacted legislation prohibiting headscarves for teachers. In 2004, Baden-Württemberg passed a law to ban the headscarf for teachers at state schools. Unlike France, however, the wearing of headscarves by students is permitted. This is because Germany's secularism is not as rigid as France's *laïcité*.

In 2002, the German Federal Constitutional Court allowed for the slaughter of animals according to Muslim rites. France allows slaughtering without stunning the animal if the slaughtering takes place in licensed slaughterhouses. The amplification of the Islamic call to prayer (*ezan*) by a megaphone is permitted in certain German cities, however banned entirely in France, (Koopmans et al. 2005, 56). As for the provisions of Muslim burials, separate cemetery sections have been provided to Muslims in Germany

(Koopmans et al. 2005, 57). French Muslims welcomed the inauguration of the first Muslim cemetery in Strasbourg only in 2012 (the CFCM, 6 February 2012).

Despite the existence of 20 Islamic private schools (Cesari 2013, 100), no public school provides religious education in France. In Germany, on the other hand, each religious group, including Sunnis and Alevis, can give religious lessons if there are enough students willing to attend the classes. Article 7(3) of the German Constitution lists the prerequisites for the right to provide religious education in public schools. In some states like Berlin, religious instruction is not a part of the regular state school curriculum (Rosenow-Williams 2012, 109).

Islam has taken a step toward recognition when some German states, including Bremen, Hamburg, Hesse, and Lower Saxony have recognized some Muslim associations as religious bodies through state contracts (*Staatsvertrag*). This status gives Muslim associations the right to provide their own religious classes in schools. German states long declined Islamic organizations' request on the basis that they do not meet the legal and structural requirements. The Islamische Föderation Berlin (IFB) provides Islamic education in Berlin for years. Since 2012, Islamic religious education has been introduced in North Rhein-Westphalia. Likewise, in Hesse, DITIB and the Ahmadiyya Association were granted the right to provide religious education in 2012. Some Islamic schools in Germany, such as those in Munich and Berlin, receive some state funding. Moreover, since 2010 Islamic celebrations are recognized as religious holidays in some states. In addition, officially recognized Islamic organizations gained the right to minister Muslims in prisons, hospitals and other public institutions, build mosques, and bury their deceased according to their religious rites (Gorzewski, *Deutsche Welle*, 29 January 2013).

With respect to cultural and political rights, scholars have argued that France allows very little space for the expression of migrants' cultural rights and political representation (Koopmans et al. 2005, 63). Although a half-hour Islamic program has been provided on Sundays since 1983, Muslims in France lack public radio or television programming in their native languages. In contrast, Germany broadcasts many programs in migrant languages. As for political representation rights, these scholars assert,

Germany has built a well-established system of special representation of foreigners on the local level. In France, on the other hand, a few migrant representatives take part in national advisory councils, such as the *Haut Conseil à l'intégration* (High Council for Integration), or the *Office National d'Immigration* (National Immigration Office). At the local level, however, some cities, including Paris and Strasbourg have introduced representative consultative councils with representatives from migrant organizations (Koopmans et al. 2005, 65).

As far as the political structure of the countries is concerned, some scholars have claimed that Germany's federal structure provides migrants more opportunities for effective political participation, and the exercise of power (Ireland 1994, Fetzer and Soper 2005, 123). More specifically, Bleich (1998, 91-92) demonstrates that Muslim families living in different French cities cannot convince high school directors to exclude controversial subjects, such as Darwinism from courses because the national curriculum is not under the authority of local officials. In Germany, on the other hand, regional governments have the authority to administer religious education. Thus, the federal structure provides room for flexibility and accommodation to Muslim demands. Others (Garbaye 2005), however, suggest that ethnic groups are easily ignored under federal systems. This review shows that the existing literature is replete with mixed conclusions as to whether France or Germany accommodates Muslims' rights and demands better.

III. Islam Councils in France and Germany

European policy-makers tend to think that the representation of Islam in Europe poses a difficult task because Muslims are balkanized by their ethnic background and political beliefs. The complex formation of identity among European Muslims has raised questions regarding the extent to which Muslims see themselves as citizens of their host states, and led to a rise in religious radicalization in cases where Muslims feel alienated from the society (Roy 2004, Kepel 2012).

Two distinct time periods have largely determined the course of Islam in Europe (Laurence 2005). From roughly 1970s to 1990s, European states were not involved in the accommodation of religious practices. By the mid-1990s, all European governments had moved from purely "outsourcing" state-mosque relations to establishing contact with moderate Muslim representatives to diminish the impact of foreign connections. During the "incorporation" period beginning in the early to mid-1990s, European states have expanded religious liberties, and provided greater institutional representation of Islam while strengthening their control over religion through institutional measures (Laurence 2012). This was accomplished primarily through the establishment of contemporary Islam Councils across Europe. The next section takes a closer look at the Islam Councils established in France and Germany in the 2000s.

The French Council for the Muslim Faith

The French Council for the Muslim Faith (*Conseil Français du Culte Musulman*/CFCM) was founded in May 2003 as a representative body enabling French Muslims to enter into dialogue with state authorities. One of the first attempts at such negotiation was put forward in 1990 by Pierre Joxe, the then Minister of the Interior as well as the Minister of Faiths (*Cultes*) in an attempt to form a representative body to discuss religious issues with Muslims (Amiraux 2003, 24). The result was the creation of the Council for Discussion of Islam in France (*Conseil de Réflexion sur l'Islam en France*/CORIF), which convened

in March 1990 with the participation of Joxe and six imams. Throughout the minister's term, CORIF functioned merely as a consultative forum for the discussion of several issues, such as the dates of Ramadan, Muslim burial, and the halal meat served to Muslim recruits in the army. CORIF slowed its meetings gradually, and ended its sessions in 1993 (Laurence 2012, 159; Çıtak 2009, 6).

Starting in 1992, Charles Pasqua, the then Minister of the Interior, reinforced relations with the Grande Mosque of Paris, which was seen as a critical institution for the moderation of Islam. Pasqua prompted mufti Dalil Boubakeur to form a team to discuss pressing concerns. Boubakeur eventually became the Rector of the Paris Mosque in April 1992 and formed the Consultative Council in 1993 (Maussen 2009). The Consultative Council soon transformed into a council representing Muslims from different sects in France. Even though certain organizations, including the Union of Islamic Organizations in France (UOIF), and the National Federation of Muslims in France (FNMF) expressed their concerns over the composition of the institution, the Consultative Council remained in existence and issued the "Charter of the Muslim Religion in France" in 1994, which reiterated the compatibility of the council with republican values (Basdevant-Gaudemet 2004, 64-65).

Upon his appointment, the new Interior Minister Jean Pierre Chevènement opted for less interventionism by replacing voluntary representation with appointment. In 1999, he started official talks with chief Muslim representatives and encouraged the creation of a central body to represent Islam. This *Istichara* (Consultation) process served as a foundational step for the CFCM. This process invited Muslims to "set up a single national body to represent the Muslim religion, in the same ways as other religions present in France" (Basdevant-Gaudemet 2004, 66). Following Chevènement, in October 2002, Nicolas Sarkozy invited the participants of the earlier consultation, to negotiations that would form the CFCM. In the aftermath of heated debates, the rector of the Paris Mosque Dalil Boubakeur was chosen as the chairman. As a result of a two-round election, different institutions, including FNFM, UOIF, and the Turkish Coordinating Committee of Turkish Muslims in France (CCMTF) linked to DITIB were elected (the

CFCM, 30 June 2013). The main topics of discussion included the regulation of Islamic worship and public ritual practices, the allocation of Muslim cemetery spaces, the accreditation of imams, and the construction of mosques (Fernando 2005, 235).

Founded as a non-profit organization rather than a religious community, the CFCM operates at the national level with a General Assembly, a Board of Directors, a Bureau, and a Regional Council for the Muslim Religion (*Conseil Régional du Culte Musulman*/CRCM), active in 25 regions, in charge of managing daily Muslim affairs. Today, the CFCM publishes commentaries and reports on its website on issues, including attacks directed at headscarved women, vandalism against mosques, Muslims' political participation in the local elections, and the condemnation of xenophobic, racist, anti-Muslim, and anti-Semitic behaviors as well as terrorist attacks targeting Muslims and non-Muslims.

Since its inauguration, the CFCM's focus on federative structures and the calculation of organizational weight based on the number and size of worship places has raised numerous questions. Large independent mosques, secular Muslims, unorganized Muslims, and organizations formed by younger Muslims have expressed their concerns over the representativeness of the CFCM (Amiraux 2003, 24; Fernando 2005,14). The question of whether the CFCM represents Islam as an ethnicized Muslim identity or a religious category has also stirred debate among Muslims (Fernando 2005, 15). The impact of homeland countries on the Islamic federations taking part in the CFCM has been another source of an internal fragmentation (Frégosi 2007).

A reform process was triggered in 2008 due to financial problems, inefficiencies, and internal disagreements at the CFCM over which calendar to rely on while determining important Muslim holy days and religious festivals (CFCM Communiqué, 24 June 2012). As a result of a draft reform finalized in February 2013, CFCM members agreed to enhance consultation within the representative authority of the organization, and strengthen links between the national and regional bodies (CFCM Communiqué, 23 February 2013).

In the CFCM elections of June 2013, a new board of directors was selected. It was decided that there would be 45 permanent appointed delegates and 45 elected delegates. Even though 70 to 80 percent of the mosques in France participated in the elections, one CFCM official shared his concern that the new reform had turned the CFCM into a less democratic institution. This is because in the past, 80 percent of the delegates were elected, whereas this percentage has now dropped to only 50 percent. In his view, the CFCM has not lived up to expectations:

I do not think the "European Islam" project has collapsed because most Muslims are compatible with European standards in daily life. However, the CFCM is not an effective institution, and the culprit is the organizations that created the CFCM. They want to keep the CFCM weak intentionally so that it will not turn into a rival. The current reform is very weak because it is in the interest of the participating organizations to have a dysfunctional reform so that they will remain the only authority on certain issues (CFCM official, personal communication, Paris, May 2013, name withheld by mutual agreement).

In the aftermath of the reform process, new electoral regulations and a new mode of governance based on collegiality, shared responsibility, and alternation within the CFCM have been introduced (the CFCM, 23 May 2013). Currently, the CFCM is presented by three main organizations: CCMTF (DITIB-linked Turkish organization), GMP (Grande Mosque de Paris, which has ties to Algeria), and RMF (the pro-Moroccan Rally of French Muslims, which is the successor of FNMF) (CFCM Communiqué, 30 June 2013).

Over the course of the *laïcité* and national identity debate in France, the CFCM has continuously reaffirmed its deep commitment to the principle of secularism as the cornerstone of a harmonious life (CFCM Communiqué, 4 March 2011). The CFCM officials retain good relations with policy-makers. Recently, they have welcomed French policy-makers' attempts to avoid associating the violent behavior of a minority of extremists with the overwhelming majority of peaceful Muslims (CFCM Communiqué, 30 March 2012). Another example is the CFCM's positive response to President Hollande's "precautious and careful" steps not to conflate Islam with terrorism (CFCM

Communiqué, 14 January 2013). The CFCM had also referred positively to Nicolas Sarkozy's moral support and promise to monitor the rise of Islamophobic acts closely (CFCM Communiqué, 23 December 2009). In a similar vein, in 2010, when an extremist imam of Egyptian nationality was expelled from France by the then Minister of Interior Brice Hortefeux, the CFCM supported the minister by pointing to the urgency for a strong and concerted effort to improve the training of imams and their statutes (CFCM Communiqué, 8 January 2010).

As my interviewee from the CFCM's board of directors concluded, significant decisions taken by the CFCM in the last few years have included the resolution regarding the finalization of the establishment of the lunar calendar based on the principles and purposes of Muslim law and the creation of *Observatoire* (Islamophobia Watch) to monitor and condemn Islamophobic acts targeting Muslims (personal communication, Paris, May 2013, name withheld by mutual agreement). In its aim to unite Muslims and harmonize their worship rituals, it has been agreed that the CFCM will also schedule the beginning and end of Ramadan as well as other important religious holy days and events (CFCM Communiqué, 9 May 2013). Today, despite heated debates regarding the representativeness and composition of the institution, the CFCM is still regarded as an important platform for discussion and consultation by the majority of Muslim umbrella organizations.

The German Islam Conference

Despite the long-term existence of Muslims in the country, German policy-makers at the federal level did not "discover" Islam until 1999, when the Christian Democrats invited the representatives of several Islamic organizations, including DITIB, Islamrat (IRD), and Zentralrat (ZMD), to a hearing held at the German Parliament. This hearing was the first symbolic step to recognize Islamic organizations as important actors in the political arena, and discuss important issues, such as the introduction of religious education in public schools (Rosenow-Williams 2012, 146). The Federal Minister of the Interior

Wolfgang Schäuble of the CDU (Christian Democrats) launched the German Islam Conference (*Deutsche Islam Konferenz*/DIK) on 27 September 2006 as the first attempt at institutionalized dialogue between federal, state, and local German governments and Muslims in Germany:

In opening dialogue with Muslims, my hope is that everyone understands that Muslims are welcome in Germany. [...] One of the effects that this conference should have is that our society will appreciate to a greater extent that Muslims are a part of this society. [...] I hope that the German Islam Conference will succeed not only in finding practical solutions but also in creating more understanding, sympathy, peace, tolerance, and above all, more communication and diversity and thereby contribute to enriching our country.[...]"(Schäuble 2006).

The DIK convened a few months after the first annual National Integration Summit of 2006, aimed at creating a joint strategy for integration with the participation of migrants. In the context of the Integration Summit, representatives from the German federal government, local authorities, and migrant organizations formed six working groups to tackle issues, such as integration courses, language training, education, women's status in social life, and civil society. The outcome was the National Integration Plan. Although the first Integration Summit did not include any representatives from Islamic umbrella organizations, several Turkish Islamic umbrella organizations, such as DITIB, had participated in the workshop for the preparation of the Integration Summit (Rosenow-Williams 2012, 120).

The DIK was the "first national reaction, involving federal, regional and local authorities, to the relatively recent presence in historical terms of Muslims as a significant population group in Germany" (the DIK 2014a). Four plenary meetings took place in the DIK I process between 2006 and 2009, which focused on several policy areas: 1) The German societal system and value consensus, 2) Religious issues, and understanding the Constitution, 3) The private sector as bridge builders, and 4) Security and Islamism (the DIK, 13 March 2008). At the 3rd Plenary Session of the DIK (2008, 4), Schäuble defines integration as "[a]cknowledging the German legal system and our value system and

showing a willingness to learn and speak the German language. [...]"

After the formation of the coalition between Christian Democrats and Liberals in 2009, the then Interior Minister Thomas de Maiziére started the DIK II process. In 2010, following the conference plenary's comprehensive work program, three key fields of concentration were chosen for the period between 2010 and 2013: 1) Promoting institutionalized cooperation and integration-related projects, 2) Gender equality as a common value, and 3) Preventing extremism, radicalization, and social polarization (Bundesministerium des Innern 2014). The plenary sessions in 2011 and 2012 focused primarily on legal and religious integration, the training of imams, and the promotion of gender equality. The 2013 plenary session gave the priority to the prevention of social polarization. Though the DIK does not possess decision-making powers, it is a critical institution as it offers recommendations on important matters.

The DIK has operated at two levels: The annual plenary session serves as a forum for the approval of suggestions put forth by the working groups. Aside from the plenary meeting, three working groups and a discussion group hold bi-monthly meetings. The first working group has concentrated on the German social system and German values. The second working group focuses the separation of church and state, religious symbols, mosque construction, Islamic religious education, and the training of imams. The scope of the third working group centers on as the media as bridge-builder, recruitment policy, prejudices in German and Turkish media, and the training of young people. Another focus has been on internal security and the prevention of violence (the DIK 2014a).

The German government is represented by 15 state officials from the Federal Ministries, *Länder*, and local councils. The Muslim community is represented by various key Turkish Islamic organizations, such as DITIB, the Union of Islamic Cultural Centers, the Alevi organization AABF, and the secular TGD (The Turkish Community of Germany) in addition to various influential individuals, including, Necla Kelek, Seyran Ateş, and Feridun Zaimoğlu as well as other Muslim organizations. The inclusion of individuals and female voices in the DIK shows that its composition differs from that of the CFCM.

The participation of individuals, such as Necla Kelek, a sociologist, and Seyran Ateş, a lawyer, sparked controversy among Muslims on the grounds that these individuals denigrate Islam, and should not be invited to a religious forum. Previously, Kelek argued that Islam is counterproductive to integration (Kelek 2007), and that the circumcision of Muslim boys should be banned (Kelek 2012). Ateş similarly suggested that Islam needs a sexual revolution (Beyer and Broder, *Der Spiegel*, 13 October 2009). The polarization between different currents within the DIK came to the forefront when other Islamic organizations criticized Necla Kelek and Seyran Ateş for their harsh statements on Islam and women wearing the headscarf.

The exclusion of non-practicing and unorganized Muslims was another point of concern for some Muslim groups. 85-90 percent of the Muslims residing in Germany are reported to not belong to any particular organization or cultural center (Landricina 2007). Another contentious issue was the exclusion of certain Islamic organizations from the DIK. Even though the most important Islamic umbrella organizations participated in the first round of the DIK, the second round took place without Islamrat, an organization with a very large Muslim follower community due to the organization's close links to Milli Görüş, which is monitored by the Federal Office for the Protection of the Constitution (*Verfassungsschutz*). Moreover, Muslim leaders have regularly expressed their complaints about the emphasis placed on security, especially throughout the DIK II process.

Currently, the DIK is undergoing a process of reformation. The second phase led to the combining of the four separate working groups into a single task force (the DIK 2014b). The rationales behind this change are efficiency and flexibility. Another goal of the second phase of the conference is to enhance communication with officials at the *Länder* and local levels. More importantly, on 27 January 2014, the DIK convened with the participation of the banned Islamrat, and sent signals to Islamic organizations that the new phase will focus on concrete issues while moving away from the focus on security. DITIB and Islamrat officials have welcomed this new strategy as a sign of the DIK's

normalization. However, only time will show how the process will continue (*Zaman*, 25 March 2014).

IV. Turkish Islamic Organizations' Responses to Host Country Policies

In order to provide an in-depth comparative analysis of the experience of Muslims in each of these contexts, this section turns to three major Turkish Islamic organizations operating in France and Germany, asking how they assess the evolution of citizenship, integration, and church-state policies with regard to Muslims in France and Germany over the last two decades.

DITIB

DITIB (*Diyanet İşleri Türk İslam Birliği*) is the European branch of Turkey's Directorate for Religious Affairs (*Diyanet*). On its website, DITIB defines itself as an organization that keeps an equal distance from, while maintaining good relations with, all other religious organizations. DITIB focuses on the facilitation of religious practices, provision of social and cultural projects, and encouragement of integration and co-existence.

The first DITIB branches in Europe were formed in 1984. Turkish guest workers began to request religious personnel from Turkey's Directorate for Religious Affairs (*Diyanet*) starting in the 1970s. However, it was not until the mid-1980s that the state began to send imams to Europe, and pay their salaries. DITIB is the largest umbrella organization in Europe, supported by around 70 percent of Turkish Muslims. It has 896 member associations in Germany and 215 in France (DITIB 2014).

Although DITIB France and DITIB Germany are both respected as dialogue partners in their host countries, DITIB France is less critical of its country of settlement. In the CFCM, DITIB is represented by the *Comité de Coordination des Musulmans Turcs de France* (CCMTF). In participating in the CFCM under a different name, DITIB's intention was to show that it is a French-Turkish civil society organization without symbiotic ties to the Turkish state. Due to its diplomatic status, and its "all-encompassing" role in the Turkish associational field, DITIB refers to itself as the most legitimate interlocutor between European states and Muslim publics with regard to issue

areas relating to Muslims. DITIB officials have maintained good relations with French policy-makers, and the organization has never received a warning from the French government to refrain from extremist acts (*Le Parisien*, 2 April 2012). According to an agreement between DITIB and the French government, 151 DITIB personnel are allowed to work in France. This is the highest quota allocated to a Muslim organization. Even though Algerians outnumber Turks, only 100 imams are sent from Algeria. DITIB officials cite this as an example of how respected the organization is in the eyes of French authorities (İzzet Er, DITIB President, personal communication, Paris, February 2013).

Although DITIB officials have expressed their satisfaction with this quota, Turkish Muslims have demanded more religious personnel. As a solution, under the guidance of *Diyanet* in Turkey, DITIB branches created the "International Islamic Theology Program" (*Uluslararası İlahiyat Programı*) in 2006. This program enables students, who have completed their high school education in host countries to obtain a bachelor's degree in Theology from universities in Turkey, and then return to their host countries upon completion. In addition, DITIB France founded the Strasbourg Theology Institute in 2011 in cooperation with French authorities. Students who successfully complete this program will receive a bachelor's degree from the Faculty of Theology at Istanbul University. The goal is to train religious personnel who can speak both Turkish and French, and possess knowledge of both countries. The Strasbourg Theology Institute has 55 students, all of whom are of Turkish descent. In France, except for DITIB, no other Muslim organization has its own such institute (Fazlı Arabacı, DITIB Strasbourg's Religious Attaché, personal communication, Strasbourg, May 2013).

The level of trust that has developed between DITIB and French policy-makers has led DITIB officials to see themselves as the most legitimate dialogue partner, and enhanced their positive perception of the French state. The Strasbourg Theology Institute is funded by *Diyanet* in Turkey, and DITIB has the final say in the design of the

¹ In 2012, one of the three imams expelled by Sarkozy from France was a Turkish imam named Yusuf Yüksel. DITIB officials highlight that this was an exceptional case since DITIB' religious employees are known as being moderate Muslims (İzzet Er, DITIB President, personal communication, Paris, February 2014).

curriculum and the appointment of teachers. This is different from the theology institutes built in Germany, which mostly rely on Germany's financial assistance, and their approval of the curriculum and appointment of teachers. Germany does not allow this project to be steered from Turkey. Meanwhile, France supports Turkey in this project enthusiastically because policy-makers believe that the alternative—the importation of imams who have lived and studied primarily in the homeland—hinders the integration of Muslims. According to a board member of the Strasbourg Theology Institute, France also backs this project because it cannot directly fund a religious project itself due to its *laïc* regime, and because it sees Turkey's experience in religious education as a key contribution to the advancement of the program (personal communication, Strasbourg, May 2013, name withheld by mutual agreement).

According to Ahmet Oğraş, CCMTF representative in the CFCM, in the long-term, DITIB's goal is to open other theology institutes and five to six *imam hatip* (preacher) schools in other parts of France (Ahmet Oğraş, CCMTF representative in the CMCF, personal communication, Paris, March 2013). DITIB's plans of opening a kindergarten in the future have not encountered any objections from French officials either, according to a formal DITIB official (personal communication, Paris, March 2013, name withheld by mutual agreement). An official from the French Ministry of the Interior's *Bureau Central des Cultes* complained that French bureaucrats are less cautious about the theology institutes than their German colleagues. In his view, France needs to adopt a more "hands-on" approach in administering the Strasbourg Theology Institute because it is not only an educational project but also a political and cultural one shaped by the homeland (personal communication, Paris, March 2013, name withheld by mutual agreement).

Another reason why DITIB officials hold a positive perception of French policies is that DITIB has been one of the founder organizations of the CFCM. DITIB was also the only organization invited to the *Istichara* (Consultation) process in the 1990s. When the CFCM was launched, DITIB had two representatives on the CFCM's board of directors, while another big Turkish Islamic organization, Milli Görüş had no members

(Çıtak 2009, 11). In the 2005 CFCM election, DITIB-linked CCMTF won a seat. Currently, CCMTF has six representatives. In accordance with the CFCM's new governance reform, it has been agreed that the CCMTF representative will serve as the CMCF's vice-president from 2015 to 2017, and president from 2017 to 2019 for the first time in DITIB's history. Even though an advisor from the Ministry of the Interior admitted to me in confidence that the CFCM was initially designed for North Africans in order to diminish North African governments' influence on French Muslims, and that Turkey has a traditionally limited role in the institution, DITIB's upcoming presidency will reinforce Turkey's role in the CFCM (personal communication, Paris, March 2013, name withheld by mutual agreement).

DITIB officials acknowledge that the CFCM is still not entirely functional because of financial problems and because of ongoing political rifts among different organizations. The CCMTF representative to the CFCM emphasized that the financial support of the homeland is therefore essential (Ahmet Oğraş, CCMTF representative, personal communication, Paris, March 2013). According to him, other weaknesses of the CFCM include young Muslims' limited role in the organization, and the CFCM's unnecessary focus on political issues rather than religious issues. Nevertheless, overall, DITIB leaders concur that the CFCM has been a groundbreaking step in making Muslims' voices heard in the public sphere. The general view among DITIB officials is that the current reform process is very promising, and the CFCM will become a more credible and democratic institution in the future. Muslim leaders also feel more comfortable under the Socialist Françoise Hollande government. In their view, compared to the earlier years of the DIK, they have more leverage and independence now.

A DITIB official, who is also a board member of the Strasbourg Theology Institute reported to me that only 0.48 percent of young Turkish Muslims attend college in France, and that, as a community, Turks are the least organized and the least politically active. He advised that Turks should also turn to each other when they face structural barriers and xenophobia. In his view, Turks should work toward enhancing their unity and political consciousness, and invest in their social capital rather than blaming French

politicians for turning a blind eye to their integration (personal communication, Strasbourg, May 2013, name withheld by mutual agreement).

Compared to DITIB officials in France, DITIB officials in Germany are more critical of their host country. First, DITIB's close relationship with the Turkish state has created a more heated debate within German policy circles (Tietze 2008, Gibbon 2009). Normally, the president of DITIB serves as the counselor for religious services at the Turkish embassy in Germany. Holding a diplomatic status, his salary is paid by *Diyanet*. DITIB presidents are trained theologians and experienced diplomats. Accordingly, they possess both religious and administrative qualifications. The dual role of DITIB presidents, and the administration of DITIB from a centralized federation have long been criticized by Germany. In order to retrench DITIB's ties to the Turkish state, Germany urged DITIB presidents to prioritize their religious task over their diplomatic service. DITIB leaders, however, see administrative skills as a necessary requirement for running such a big organization, and find it unfair that Germany tolerates the dual responsibility exercised by bishops and rabbis of big Christian and Jewish organizations, who serve as both theologians and administrators (Bekir Alboğa, DITIB spokesperson, personal communication, Cologne, November 2013).

In my interviews, DITIB officials drew attention to what they see as another "double standard," in that Christian and Jewish groups are granted the *Körperschaft des öffentlichen Rechts* status as opposed to Muslims. In Hesse in 2012, DITIB became one of the two Muslim organizations to be granted the right to offer religious education. Nevertheless, DITIB officials contend that there are more rights to be gained. According to DITIB's spokesperson Bekir Alboğa, lacking such privileges puts DITIB in a very disadvantaged position:

Turkish Muslims face financial hardship in Germany because they do not receive state subsidies or tax revenues. On the other hand, every year tax revenue given to Christian churches equals to ten billion euros. Other Christian organizations, such as CARITAS and DIAKONIE receive 50 billion euros. Under these circumstances, I find it unsurprising that DITIB relies on Turkey's financial assistance (personal communication, Cologne, November 2013).

The German Council of Science and Humanities provided the impetus for the creation of Muslim theology as a university course in 2010. Similar to the Strasbourg Theology Institute in France, the centers of Islamic Studies came to fruition in Münster, Osnabrück, Paderborn, Tübingen, Frankfurt, Hamburg, and Erlangen-Nürnberg since 2010 to train academics in Islamic theology (Graduiertenkolleg Islamische Theologie 2014). The federal government's estimation that 2,200 teachers will be needed to develop Islamic religious education in public schools led policy-makers to help create these institutes because the majority of imams residing in Germany are foreign-trained, and cannot speak German (Strack, *Deutsche Welle*, 16 January 2013). The Theology Center in Osnabrück went further, and paved the path for designing a course to train imams (Impey, *Deutsche Welle*, 10 October 2010). With the funding from the Federal Ministry of Education and Research, these Islamic Theology centers aim to train theologians, social workers, and religious educators who will serve in mosques (Bundesministerium für Bildung und Forschung 2014).

DITIB authorities have suggested that students who will receive diplomas from *Diyanet*'s International Theology Program should be appointed to German public schools to teach Islamic religious courses upon the completion of their studies in Turkey, given that they will be fluent in both Turkish and German, and there is still a big demand for religious personnel in Germany. Contrary to this expectation, as DITIB's spokesperson concluded, German states neither secure position for these graduates nor do they provide any financial assistance to this program. Instead, Germany gives priority to students graduating from its own theology institutes, which is disappointing for DITIB. The DITIB spokesperson criticized Germany for not guaranteeing that students graduating from German's Islamic education centers would be appointed to public schools. In his view, Germany is not taking this issue seriously, and the shortage of teachers could be ceased by DITIB's International Theology Program (Bekir Alboğa, DITIB spokesperson, personal communication, Cologne, November 2013).

A council (*Beirat*) composed of eight individuals monitors the administration of the Islamic theology departments within public universities in Germany. Four *Beirat* members are representatives from Islamic umbrella organizations, and the rest are Muslim individuals. The same procedure is used in monitoring Islamic religious course curricula. The state governments appoint these individuals, however the Islamic organizations must certify that they are qualified. The chairman of Islamrat noted that, for the most part, individuals are chosen in a biased manner to align with state interests. He sees this as a state intervention: "They say you can own a house, but you need the consent of your four neighbors to decorate it. This is only partial freedom" (Ali Kızılkaya, Islamrat chairman, personal communication, Cologne, November 2013).

DITIB finds it onerous that each Islamic umbrella organization must file a new application in each state to be granted the status of religious community and to be certified to provide religious education in public schools. To decentralize, and to weaken its ties to Turkey, DITIB has reconstituted itself in the form of 15 regional associations. This has not solved all of its problems, however, as the organization grapples with forming a new charter, and adjusting to the requirements in each state. DITIB's spokesperson complains about the hurdles stemming from the federal structure of Germany: "Under the unitary system, once recognized as a religious community, all of our 910 associations would have the right to provide religious education. Now we need to make a new effort every single time" (Bekir Alboğa, DITIB spokesperson, November 2013, Cologne). As another DITIB official who wished to remain anonymous put it:

Different German states have different regulations. For instance, some imams encounter bureaucratic problems in certain states. However, in other states, imams have easier access to naturalization or residence. Likewise, in some states, if you have good relations with local municipalities, authorities ignore how big you construct your masjid (prayer room), whereas in others, it is hard to obtain authorization. There are so many discrepancies (personal communication, November 2013, Cologne, name withheld by mutual agreement).

DITIB was present in the DIK I, and DIK II processes. DITIB was also the only association invited to the National Integration Summit. However, DITIB's inclusion led to debates in the media due to its close link to the Turkish state. Eventually, the German state decided to revoke DITIB's invitation to participate in the Working Group. Bekir Alboğa noted that DITIB's inclusion could have laid the foundation for improved DITIB-Germany relations. However, suspicions regarding DITIB prevented such collaboration. DITIB officials do not find this prejudice well-grounded, given that DITIB is an authorized German institution complying with the German law that works toward enhancing peaceful co-existence. In 2007, DITIB officials boycotted the second National Integration Summit because of a law tightening immigration and family reunification policy (Bekir Alboğa, DITIB spokesperson, personal communication, Cologne, November 2013). Currently, DITIB is a member of the National Integration Summit.

Milli Görüş

Milli Görüş with its current name and form was founded in 1995. However, it has operated under other different names since 1976 (Rosenow-Williams 2012). Today, it has 514 mosque organizations in Europe. Of these, 323 of these are located in Germany, and 70 are located in France. Milli Görüş Germany (*Islamische Gemeinschaft Milli Görüş* e. V./IGMG) has 30 regional centers in Germany, and Milli Görüş France (*Communauté Islamique Milli Görüş*/CIMG) has 4 regional centers in France (IGMG 2014). Since its existence in Europe dates back to the 1970s, Milli Görüş opened the first mosques in Europe even before DITIB.

Even though officials from Milli Görüş in France and Germany have less favorable relations with their host countries compared to other Turkish Islamic umbrella organizations, Milli Görüş leaders in Germany, like those at DITIB, are more critical of their host state compared to their counterparts in France.

Milli Görüş (CIMG) leaders in France suggested that the CFCM's raison d'être was to create *Islam de France* (Islam of France), rather than *Islam en France* (Islam in

France). They identified the ongoing turf war among different sending countries and Islamic organizations as the major shortcoming of the CFCM. These leaders also saw the outsized role played by mosque federations despite their limited number of followers, as another serious drawback of the CFCM. Even though Milli Görüş France (CIMG) has seventy mosques, it has secured only one seat in the CFCM. According to the head of CIMG Paris, the most concrete accomplishment of the CFCM, namely the agreement on the lunar calendar is a superficial success given that the institution has the capacity to shape more important debates, such as Islamophobia (Erol Şenol, CIMG Paris chairman, personal communication, Paris, May 2013). CIMG's women's organization head in Paris agrees that the CFCM has shown progress only on symbolic issues, and thinks it is because it is a top-down institution imposed by the French government. The homeland countries, she notes, still play a big role in the CFCM, and the institution fails to reach grassroots organizations and individual Muslims. She sees the creation of a bottom-up organization initiated by Muslim leaders as a better alternative (Ayşe Şenol, CIMG Paris women's unit head, personal communication, Paris, May 2013).

Nevertheless, Milli Görüş officials in Paris share the view that the CFCM is a "one of a kind" organization that enables Muslim leaders from different groups and backgrounds to sit around one table. CIMG officials do not have a problem communicating with French policy-makers like the Milli Görüş leaders in Germany do. For instance, CIMG was not present in the CFCM in the early 2000s, but it was because of DITIB's reluctance to include Milli Görüş in the process rather than French policy-makers' objections (Fatih Sarikır, CIMG spokesperson and CFCM representative, personal communication, Paris, March 2013). French Milli Görüş leaders held extensive talks with French authorities and managed to secure a seat in the CFCM, becoming a permanent member in the CFCM charter (CFCM Communiqué, 8 June 2013). CIMG leaders are optimistic that they will gain more seats in the future.

The Milli Görüş spokesperson in Paris suggested that Turkish Muslims should also question their own behavior, when they encounter maltreatment in society. In his view, if their interests are overlooked by society, it is because Turks living in France have

shown little interest in French politics, despite having the right of dual citizenship. Only a small minority of dual citizens, he points out, goes to the ballot box. He has observed that Milli Görüş leaders in Germany are struggling with larger bureaucratic hurdles and prejudices since they lack dual citizenship. In his words:

Germany implements a very strict inspection of passports when Turkish imams enter the country. In general, imams who come to Europe on temporary contracts are middle-aged men retired from *Diyanet*. These imams own green passports granted to public servants. While imams mostly encounter problems in entering Germany and renewing their passports, imams working in France have favorable conditions (Fatih Sarikir, IGMG spokesperson and CFCM representative, personal communication, Paris, March 2013).

CIMG officials in Paris conclude that most of the time, French municipalities tolerate large cultural centers, which are later turned into mosques. Moreover, some cities, such as Strasbourg, have even more flexible regulations that permit mosques with minarets. This is because the Alsace-Moselle region is subject to the Concordat of 1801 rather than the 1905 *laïcité* law. This is because this region was German in 1905. Concordat grants Christian churches and Jewish consistories public subsidies and the right to provide religious education. In this region, the state also helps to finance the construction of places of worship and approves the appointments of clergy members and pays their salaries. However, the support given to other religions has not been extended to Islam (Erlanger, New York Times, 6 October 2008). In Paris, construction and mosque enlargement regulations are stricter due to the historical and symbolic importance of the city. More importantly, even though no government subsidy is allocated for religious activities, Milli Görüş associations sometimes receive financial support from French municipalities for some cultural and sports activities (Erol Şenol, CIMG chairman, personal communication, Paris, May 2013). Some Milli Görüş associations serve as education centers. In Paris, for instance, seven of the ten Milli Görüs associations operate as mosques with imams, and three provide educational services. In a few years, Milli Görüş aims to open new primary and high schools in Paris, Strasbourg, and Lyon. CIMG leaders note that as long as they comply with the law, it is easy to open schools. Moreover, schools can receive government subsidies after five years of successful instruction. For example, there is a Muslim high school in Lille that receives such subsidy. The number of Milli Görüş mosques continues to increase as well. In the last two years, CIMG purchased three new buildings in Paris that will serve as mosques (Ayşe Şenol, CIMG Paris women's organization head, personal communication, Paris, May 2013).

Milli Görüş Germany (IGMG) leaders have more turbulent relations with their host country compared to Milli Görüş France (CIMG). First, no Islamic organization, including Milli Görüş, receives any kind of financial support from German authorities. However, this is not the case in France. Second, in Germany, IGMG is under surveillance by state authorities due to its alleged extremist political agenda (Schiffauer 2010). IGMG is a member of two broader Islamic umbrella organizations, namely Islamrat and the Coordination Council of Muslims in Germany (KRM). It was also present in the DIK I. However, its participation in the DIK II has been suspended due to the ongoing allegations against IGMG leaders. IGMG officials also question what it means to be "radical" or "extremist." The former head of IGMG sees contradictions in the state policy: "If we are a radical organization, and if we pose a threat to the public order, then why are we allowed to operate as an organization? Why don't they abolish us?" (Oğuz Üçüncü, former IGMG chairman, personal communication, Cologne, November 2013).

While the state contracts have introduced new rights, such as the right to practice religious holidays, and teach Islamic courses in public schools, IGMG officials find the existing state contracts inadequate given that they only merge separate regulations that have already been in practice for years. Moreover, despite these new rights, they argue, Muslim organizations still do not receive subsidies for kindergartens and social services, nor do they receive church taxes or civil service duties. IGMG's spokesperson sees these agreements as merely descriptive accords, not going beyond the legal rights already specified in the constitution (Mustafa Yeneroğlu, IGMG spokesperson, personal communication, Cologne, November 2013).

IGMG leaders are disturbed that the integration of Muslims has often been cast as in terms of security in policy debates. The German media has contributed to the rhetoric characterizing migrants as threats and inciting people's fears about the "other." Halm's study (2006) shows that 31.3 percent of media reports in leading German newspapers brought up Islam and Muslims in relation to terrorism between 2003 and 2004. Likewise, the parliamentary debates after 9/11 increasingly associated Muslims with fear and terrorism (Rosenow-Williams 2012, 150). Despite Germany's shift towards a more inclusive regime, the fact that the 9/11 attacks were plotted in Germany triggered tighter security measures. IGMG leaders suggest that as long as the "parallel societies" and "leading culture" (leitkultur) rhetoric dominates the public discourse, the state contracts are bound to remain as shallow demonstrations of rapprochement. Even though a small percentage of voters choose the radical right in Germany (Givens 2005), these leaders refer to the xenophobic publications by SPD politician Thilo Sarrazin and Neukölln Mayor Heinz Buschkowsky. In their view, the DIK has no credibility as long as these publications sell thousands of copies, and attract popular attention (Oğuz Üçüncü, Cologne, former IGMG chairman, personal communication, November 2013).

In comparing Germany to France, IGMG leaders point out that Milli Görüş leaders in France find it much easier to adjust to their host country because CIMG enjoys institutional recognition. IGMG leaders view the French state's friendliness towards Muslim organizations as genuine. Due to its colonial experience, they claim, the way France transforms state-Islam relations is more careful and empathetic. As a result, French Muslims do not have problems internalizing *identité française*, and the institutionalization of Islam stands on firmer grounds. Moreover, according to Milli Görüş leaders in Germany, the inclusion of CIMG in the CFCM signals that the French state perceives Milli Görüş as an important and irreplaceable civil society organization. They note that, especially after being included in the CFCM, the majority of Milli Görüş leaders in France applied for dual citizenship. IGMG officials emphasize that among the Islam Councils established in other European countries, the DIK is the weakest one. In comparison, even the *Conseil Islamique Suisse* in Switzerland is seen as a more inclusive

organization despite the minaret ban in the country. IGMG leaders find it problematic that the DIK is connected to the Ministry of Interior Affairs unlike the Dutch and Belgian Islam Councils, which are connected to the Ministry of Justice. An advisor from the German Ministry of Interior Affairs did not agree with the argument that the reason why the Islam Council in Germany is tied to the Ministry of Interior Affairs is to link religion to security. In his view, this is only an administrative decision originating from Germany's federal system, and the DIK focuses more on practical issues rather than security or identity issues. For him, the main question is also different: "Are Muslim organizations capable of cooperating with the German state in the same ways that Christians and Jews do?" In comparing the federal system with the unitary system, he admitted that there are obvious disagreements among regional states regarding which organizations qualify as dialogue partners. The fact that each state has different criteria may lead to inconsistencies, he suggested. In his view, even though the federal system is more democratic, another disadvantage of this system is that decisions are taken very slowly. When asked how the DIK views different Turkish Islamic organizations as dialogue partners, he reported that DITIB's close ties to the Turkish state, Milli Görüs's links to the Muslim Brotherhood, and the Union of Islamic Cultural Centers' relatively limited role in the Islamic associational field call into question their ability to serve as the primary dialogue partner. This is why, he explained, the Alevi organizations have been recognized as religious communities in some states despite their limited number of followers. My respondent concluded that to help its normalization and localization process, policy-makers should cooperate with Milli Görüş branches at the local even though the organization has been monitored at the federal level (personal communication, Berlin, November 2013, name withheld by mutual agreement).

Muslim leaders also draw attention to the excessive state intervention in the formation and administration of theology institutes (Oğuz Üçüncü, former IGMG chairman, personal communication, Cologne, November 2013). Oğuz Üçüncü's remarks regarding the headscarf ban in France are equally telling: "If French policy-makers say 'I do not want to see your religious symbol,' that is understandable. I think the headscarf

ban should be seen as a benevolent policy that respects other people" (personal communication, Cologne, November 2013). The IGMG leader asserts that even though the legal structure in France is more exclusionary, in practice, France has a participatory political culture. To the contrary, Germany is afraid to embrace pluralism despite its liberal constitutional background. When asked why he finds German policies more repressive than French policies, Üçüncü explained that Germany lacks a colonial history, and thus has no experience communicating with Muslims. Moreover, the smooth assimilation of Poles and Russians in Germany has created the same expectation for Turks, he suggested.

IGMG officials agree with DITIB authorities in Germany that the federal structure of Germany creates disadvantages for their organization with respect to adjusting to the varying laws of different states, and being represented at the national level. Each German state, these officials complain, has a unique legal structure that requires different expertise and personnel:

Depending on the dynamics of each federal state, Islamic organizations either choose to collaborate with each other, or they compete with each other to be the single provider of Islamic education. Given that Islamic organizations already suffer from weak infrastructure, the majority of organizations lack resources to undergo modifications. Different regulations lead to fragmentation and tension among Islamic organizations. They refer to us as an extremist organization, and warn other Turkish organizations not to collaborate with us. Their intention is to pit us against each other so that they can "divide-and-rule" (Oğuz Üçüncü, former IGMG chairman, personal communication, Cologne, November 2013).

For IGMG leaders, the crux of the issue is that normative basic rights reserved for Muslims in the constitution are not applied in actual practice. IGMG's officials advocate for an application of the constitutional rights to daily practices, equal political participation, institutional recognition, termination of the *leitkultur* and security rhetoric, and extension of dual citizenship to Turks. IGMG officials also highlight that there are disagreements over what "integration," "religious community," and "the status of corporation under public law" mean. Hence, they find it important that consensus is

reached over key concepts (Mustafa Yeneroğlu, IGMG spokesperson, personal communication, Cologne, November 2013).

The Islamic Council for the Federal Republic of Germany (Islamrat/IRD) was established in 1986 as an umbrella organization to convene Islamic organizations from different ethnicities under one roof. Islamrat's biggest member is Milli Görüş, therefore Islamrat is accepted by German authorities as the "substitute" for Milli Görüş since Milli Görüş has been put on the black list. Islamrat was excluded from the DIK II process due to its organic links to Milli Görüş. The head of Islamrat complains that the German state makes a distinction between "good Muslims" and "bad Muslims," and pushes them to the margins. Following arduous talks, Islamrat was invited to the DIK again, however it quickly removed itself realizing that Islam was being treated as a "problem" in the DIK. Interestingly, for Islamrat's chairman, the DIK is a state-imposed platform, while the CFCM is a bottom-up civilian institution composed of competent Muslim actors. He suggests that the Islam Council in Germany is about *Islah* (taming), not *İslam* ("*İslam Konferansı*") (Ali Kızılkaya, Islamrat chairman, personal communication, Cologne, November 2013).

Islamrat's main demand is to open a theology institute under the full control of Muslim organizations, and to obtain the right to provide religious education. Islamrat argues that the way theology institutes are administered in Germany is very biased. Islamrat, for instance, was removed from supervision board (*Beirat*) of the theology institute in Tübingen. In a similar vein, in Münster, controversial individuals were designated by the state as the advisory board members. The state-appointed individuals and Islamic organization members often have clashes over how to run the institutes. One recent example is that the former reformist-oriented director of the Institute in Münster was accused of denigrating Islam, and his predecessor resigned because of ideological disagreements with the Islamic organizations forming the KRM (Mende, *Qantara*, 2013).

The Berlin branch of Islamrat is the only Sunni Islamic organization that holds the right to provide Islamic religious classes in Berlin. When asked if he sees this as a

breakthrough, the head of the Berlin branch of Islamrat gives a puzzling answer that shows that organization leaders are still not satisfied:

After a grueling legal battle that lasted 18 years, we attained this right. Of course this is a major achievement. However, since we began offering religious courses, our school has been inspected 360 times. Only in North Rhein-Westphalia, there are 380,000 Muslim students. However, currently only 5,000 students can take this course. We reach out to a very small community." (Burhan Kesici, Islamrat Berlin spokesperson, personal communication, Berlin, November 2013).

According to Islamrat officials, another litmus test highlighting Germany's unconstitutional practices was a citizenship test that was in effect in Baden-Württemberg from 2006 until 2010. This quiz included contentious questions, including: "What would you do if you learned that your son is homosexual?" and "Your daughter applies for a job in Germany, however she receives a negative response. Later you find out that a black woman from Somalia receives an offer instead. What would you do?' (Hawley, *Der Spiegel*, 31 January 2006).

In the past, German regional states were reluctant to grant the religious community recognition to Muslim organizations on the grounds that Muslim organizations do not have enough followers and their institutionalization is immature. Islamrat chairman finds this stipulation unfair given that Alevi (a branch of Shi'a Islam) and Ahmadiyya (a religious movement originating from East India) communities were recognized as religious communities despite a limited number of followers. Islamrat criticizes the DIK for intentionally inviting controversial individuals "insulting" Islam, such as Necla Kelek and Seyran Ateş to its forum to ignite division among Muslims. Moreover, Islamrat also accuses the DIK publications and press statements of not reflecting organizations' views accurately.

The regional state in Berlin created the "Islam Forum" in November 2005 as a platform for exchanging information among bureaucrats and representatives of various religious communities. In 2008, the Islam Forum in Berlin initiated an imam and pastor (*Seelsorgerinnen*) training program called *Berlin Kompetenz*, which allocated a budget to

Muslim organizations to train 28 imams to help Muslim prisoners (Das Islamforum Berlin 2014). The Federal Office for the Protection of the Constitution decided to cancel this agreement in December 2013 with the claim that 22 of the selected imams hold extremist views (Press Conference held at the Islamrat Berlin Branch, personal participation, Berlin, November 2013). This incident led to an outcry among Muslim organizations, which eventually prompted them to withdraw from the Islam Forum. This incident is referred to as another tacit "double standard."

In February 2014, IGMG chairman Oğuz Üçüncü, who served as the leader of the organization since 2002, resigned. This development created a new window of opportunity for Islamrat's future relations with the German authorities. In March 2014, to restructure the DIK, in the Minister of the Interior Thomas de Maizière invited seven representatives from Islamic umbrella organizations, including Islamrat (*Deutsche Welle*, 24 March 2014) and promised to modify the DIK's working objectives. This is a promising new start for the normalization and improvement of Milli Görüş and Islamrat's relations with the German state.

The Union of Islamic Cultural Centers

The Union of Islamic Cultural Centers is a Turkish Sunni organization whose members practice Islamic mysticism related to the Sufi Naqshibendi order. The organization follows the teachings of Süleyman Hilmi Tunahan Efendi, and focuses on Islamic training (Jonker 2002). Compared to Milli Görüş, the Union of Islamic Cultural Centers has better relations with authorities in both France and Germany. However, similar to the views shared by DITIB and Milli Görüş officials in France, leaders of this organization in France view their host state more positively than those located in Germany.

In France, the first branch of the Union of Islamic Cultural Centers was founded in 1981 to provide spaces for daily religious practices and Islamic education for children. As the organization's branches mushroomed over time, in 1996, the existing branches were united under the Federation of Islamic Cultural Centers. Today, the organization has

40 mosque associations in France. Over time, the Union of Islamic Cultural Centers has channeled its resources toward the creation of boarding schools where Islamic training is offered (representative of the Union of Islamic Cultural Centers, personal communication, Paris, June 2013, name withheld by mutual agreement).

One board member of the Union of Islamic Cultural Centers in France notes that local authorities allow the construction of new buildings, and enlargement of the existing ones. After 9/11, some municipalities initially delayed granting authorization to the organization's buildings. However, after establishing close connections, local authorities have been on good terms with organization members. Currently, the organization owns 12 boarding schools throughout France. My respondent emphasizes that local authorities, especially mayors, have been very accommodating in providing necessary authorization for boarding schools. As one organization leader put it, receiving boarding school authorization is much harder in Germany:

The Union of Islamic Cultural Centers has over 400 associations in Germany, however only 11 of them are authorized to build boarding schools In France, we have 40 associations, and 12 of them include boarding schools. The regulations are even more restricting in North Rhein-Westphalia, where the Turkish population is very dense. Recently, we built a new mosque with a boarding school in Nancy, France. It has 6 floors, and the mosque can host 815 people. All the important local authorities were present in our inauguration ceremony. Our mosques in Nantes, Rouen, and Lyon also obtained boarding school authorization very easily. The more we explain who we are and what we do, the more officials trust us. Here in Pantin, we are in the process of enlarging our mosque. Our mosque will host 910 people, and 19 students will stay in the boarding school (representative of the Union of Islamic Cultural Centers, personal communication, Paris, June 2013, name withheld by mutual agreement).

It was interesting to hear from my respondent that despite having an Islamic identity, their local associations receive subsidies from French local municipalities. Even though the central federation receives no financial funding, municipalities help them by providing space for organizational activities. My respondent suggested that local authorities have adopted a milder stance than in the past due to Turks' right to dual

citizenship, and their growing importance as a voting block. As Muslims' political participation increases, politicians need to have better relations with Islamic organizations, he argued. He also agreed with other DITIB leaders that the leftist government currently in power led by François Hollande has been treating Muslims better.

The Union of Islamic Cultural Centers leaders in France also have a positive perception of the CFCM. For them, bringing key Muslim leaders together to discuss important issues is a remarkable success. The organization collaborates with DITIB in the CFCM. Despite being an apolitical organization, thanks to its alliance with DITIB, which has several seats in the CFCM, the Union of Islamic Cultural Center contributes to the discussion of political and cultural issues that are of special interest to Muslims.

The first Union of Islamic Cultural Centers (Verband der Islamischen Kulturzentren e. V./VIKZ) branch was founded in 1973 in Germany. Today, it has 300 mosque organizations and 21,000 members in the country (VIKZ 2014). VIKZ trains its own imams rather than importing imams from Turkey. The organization is a participating member in the DIK I, and the DIK II processes.

VIKZ refers to itself as a "German" institution oriented towards the host country, which works for the preservation of language, culture, and religion. VIKZ officials emphasize that the organization respects and acts according to the German constitution. VIKZ has been recognized as a religious community in Hamburg and Bremen along with *Schura* (the Council of Islamic Communities) and the Alevi community. However, a series of practical problems exist with respect to the recognition of their official curriculum, and the fact that the first cohort of the theology institutes in German universities will graduate in 2016 (Cosse, *Deutsche Welle*, 2 December 2013). VIKZ had been campaigning to be recognized as a religious body in North Rhein-Westphalia since 1979.

VIKZ joined the KRM due to its desire to provide Islamic religious courses in North Rhein-Westphalia. Regional governments had long denied Muslim organizations' right to teach Islamic education on the grounds that Muslim organizations lack a clear hierarchy and centralization (Cesari 2013, 99). As one official from VIKZ explains:

When the German state asked for a single body to provide religious education, the KRM said 'here we are!' But the German state kept finding excuses. They said the KRM fails to speak with one voice, so it should not be recognized as a religious community authorized to provide religious education (representative of the Union of Islamic Cultural Centers, personal communication, Cologne, November 2013, name withheld by mutual agreement).

VIKZ officials also see discrepancies in the way the German regional states administer Islamic education. They observe that in some states, such as North Rhein-Westphalia and Bavaria, the German state is very much involved in the process, and offers *Islamkunde*, rather than *Islamische Religionsunterricht* (Ministerium für Schule und Weiterbildung 2014).² VIKZ officials see this as a problem since the former has a lighter content. VIKZ also had a clash with the University of Münster's theology institute when the director of the university questioned the legal status of VIKZ before approving it as a monitoring member.

VIKZ officials in Cologne hail the DIK's first two working groups as successes since these sessions triggered the creation of Islamic religious courses in several German states. Even though the extent of privileges given to Muslim organizations is not comparable to those enjoyed by Christian and Jewish communities, VIKZ officials are satisfied that there has been important progress with respect to the introduction of religious education. They are optimistic that the status of religious community will be given to other Muslim organizations in other German states in a few years.

VIKZ also characterizes its relations with German offices as positive, due to their involvement in common projects with German officials. In the past, the German Federal Ministry of Family Affairs, Senior Citizens, Family, and Youth allocated funds to two different VIKZ projects, one focusing on helping students with their school assignments,

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² The difference these two courses is that the former teaches Islam from a cultural perspective, whereas the latter offers a serious and well-grounded teaching of Islam based on theology (Ministerium für Schule und Weiterbildung 2014).

and another focusing on empowering migrant parents. A VIKZ official in Cologne adds that local municipalities provide assistance for different VIKZ projects related to vocational training, education, and sports activities. In his view, German authorities are now working harder to communicate with migrant organizations (representative of the Union of Islamic Cultural Centers, personal communication, Cologne, November 2013, name withheld by mutual agreement). VIKZ officials in Berlin, on the other hand, are more critical:

The DIK is full of enforcements. We froze our relations with the DIK a few times. Likewise, the National Integration Summit never takes our suggestions into consideration. We have disagreement over how one should define integration. The German definition of integration is to drink beer, and eat pork (representative of the Union of Islamic Cultural Centers, personal communication, Berlin, October 2013, name withheld by mutual agreement).

VIKZ officials complain that their associations in Berlin hardly receive any funds from local municipalities. VIKZ also highlights that mosque-themed projects are always rejected. When asked why one sees disparity between VIKZ Cologne and VIKZ Berlin leaders' experiences, an official from Berlin asserted that their perceptions are shaped by how accommodating each city is, and that Berlin is more coercive compared to Cologne. In some lenient states, such as Hamburg, VIKZ is recognized as a religious community along with DITIB. VIKZ's boarding schools face no bureaucratic challenges in purchasing buildings or renewing authorizations in such states. In other cities, like Berlin, there is more prejudice. Officials in Berlin complain that the state contracts are not very detailed, and Muslim organizations are not consulted when states appoint teachers or design curricula. In his view, the theology institutes operating at German universities are not a better alternative to religion classes provided by organizations.

When it comes to improving Muslim relations in Germany, VIKZ officials have four principal demands: dual citizenship should be extended to Turkish Muslims, Muslim organizations should be recognized as a religious community and obtain the status of corporation under public law, Turkish should be one of the main languages taught at

schools, and the stigmatization of Islam as a security threat should be deemphasized. VIKZ officials in Berlin are especially outspoken in decrying Germany's distinction between "good Muslims" and "bad Muslims," and they also call for Milli Görüş's inclusion in the DIK. In comparing France and Germany with respect to the accommodation of religion, VIKZ leaders in Berlin refer to France as a flexible and inclusive host country. In their view, *laïcité* treats all religious groups equally.

In June 2011, DITIB and VIKZ agreed to cooperate with the German Minister of the Interior to combat radicalization together in the context of the Security Partnership Initiative program. In 2012, the Ministry of the Interior launched a campaign to inform Muslim families about the perils of the radicalization of young Muslims. Accordingly, the Ministry disseminated English and Turkish *Vermisst* (Missing) posters to social media sources and Turkish neighborhoods in Berlin, Bonn, and Hamburg. One of the most controversial *Vermisst* poster shows a headscarved girl, and warns:

This is my friend Fatma. I miss her because I do not recognize her anymore. She is becoming a more reserved and radical person each and every day. I am afraid of losing her to religious fanatics and terrorist groups. If you think like me, get in touch with the counseling centers of radicalization (Initiative Sicherheitspartnerschaft 2012).³

After the poster incident broke out, together with other Muslim organizations, VIKZ suspended its cooperation with the Ministry claiming that the campaign stigmatizes Muslims, and creates new areas of conflict (Islamophobia Watch 2012). VIKZ leaders refer to this campaign as a critical moment that shows that Germany still has to go a long way to go in embracing pluralism.

The Minister of the Interior Thomas de Maizière held the most recent DIK meeting in March 2014 (*Zaman*, 25 March 2014). VIKZ was one of the seven organizations to attend the meeting. Islamic organization leaders, including VIKZ officials, have welcomed Islamrat's inclusion in the DIK as an important act signaling the

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³ Author's translation

DIK's shift from a security-themed focus to a dialogue-themed framework. Nevertheless, it is still too early to have high hopes about the transformation of Islam-state relations in Germany.

V. Conclusion

Through an analysis of three big Turkish Islamic umbrella organizations in France and Germany, this paper fleshes out how citizenship, integration, and church-state policies engineered by host states are practiced, and redefined by Turkish Muslims. In doing so, this study points to a gap between the rights reserved for Muslims in constitutions, and their actual implementation. In comparing France and Germany with respect to the accommodation of religion, Turkish Muslim leaders refer to France as a more flexible and inclusive host country.

First, even though the constitutional setting requires a strict separation of state and religion in France, in reality, rules are relaxed in a way to provide benefits to Muslim groups. To the contrary, in Germany the constitution itself is more liberal, however actual practices do not reflect this flexibility. A few federal states have recently taken positive steps by recognizing some Islamic organizations as religious communities. However, the existing state contracts are still seen as shallow acts, and are criticized for their weak legal basis. More importantly, Germany has not extended the Körperschaft des öffentlichen Rechts status to Islamic groups even though several Christian and Jewish communities enjoy this privilege. It is not expected that full privileges will be granted to Muslim communities any time soon. Even though one might expect Germany's relationship with Islam to be received more positively by Turkish Muslim organizations in Germany, they feel the opposite when constitutional guarantees of religious freedom and dual citizenship rights do not apply to them but are granted to other religious groups. France, on the other hand, keeps equal distance from all religious groups, which prevents such resentment. Moreover, several Muslim organizations in France receive financial support for their cultural and sports activities.

Second, even though Germany is not the only country in Europe that links Islam to the security discourse, Turkish Muslims are disturbed that the integration of Muslims has often been cast as in terms of security in policy debates in Germany. For Turkish Muslims in both France and Germany, the CFCM is regarded as a more legitimate and

democratic institution. The CFCM is more inclusive since DITIB France (CCMTF) will preside the CFCM in 2017 thanks to the rotation system, and Milli Görüş has secured a seat in the CFCM. Muslim leaders in Germany, on the other hand, criticize the DIK for electing controversial representatives, excluding Milli Görüş from its board, pitting organizations against each other by creating a distinction between "good Muslims" and "bad Muslims," and declining the institutional recognition of the KRM.

Turkish Islamic organizations in Germany express their concerns regarding excessive intervention by the German state in religious affairs. This has become more evident in the formation and administration of Islamic religious classes and theology institutes created in France and Germany. While France supports the Strasbourg Theology Institute enthusiastically despite its strong financial backing from Turkey, Germany does not allow the theology institutes to be steered from Turkey. Muslim actors in Germany claim that they have a very limited role in determining the curricula and administration of religious courses and the theology institutes. Most recently, some Turkish Islamic organizations had clashes with German authorities with respect to their participation in the supervision boards of the theology institutes due to their suspicious agenda. In France, on the other hand, Muslim leaders have maintained positive relations with local and national policy-makers.

Finally, Islamic organization leaders in Germany argue that the federal system creates disadvantages and discrepancies since they have to adjust to differences in rules between regional states. At the same time, reaching out at the national level is a hard task for Muslim organizations. Under a unitary political system, these leaders conclude, Islamic organizations would become better organized and would be easily recognized as political actors.

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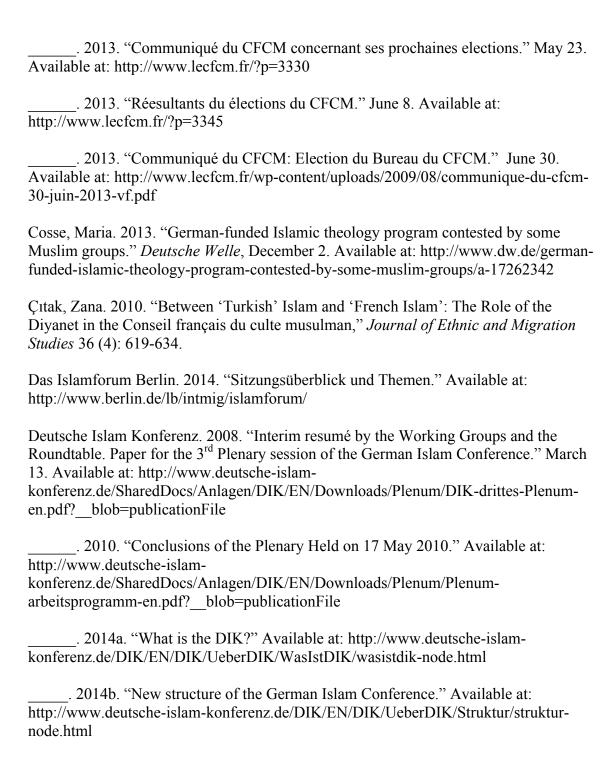
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