Comparative or Multiple Secularisms? Evidence from a Comparison of France and Turkey

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Abstract

The post 9/11 scholarship on secularism and religion is dominated by the multiple modernities approach. This article follows a historical-genealogical line instead for selected moments of debate on the institutional relation between state and religion in Turkey and France. I show that in fact the historical-genealogical line of inquiry provides plenty of evidence for a shared political field of secularism between France and Turkey despite their different majority religions. Part of this political field is politicians in both country-contexts quite often compare their country with other countries and contest each other's comparisons. I discuss the analytical and theoretical return that an interregional comparison, and its documentation of contested comparisons in politics, can yield for reflecting on the main premises of the multiple modernities approach.

Karşılaştırmalı Laiklik mi yoksa Çoklu Laiklikler mi? Fransa ve Türkiye Karşılaştırmasından Bulgular

Özet

11 Eylül sonrası laiklik ve din üzerine yapılan çalışmalarda çoklu modernlikler yaklaşımı hakimdir. Bu makale bu yaklaşım yerine Türkiye ve Fransa'da devlet ve din arasındaki kurumsal ilişkiye dair seçilmiş tartışma anlarına odaklanarak tarihsel ve jeneolojik (soybilimsel) bir çizgi izlemektedir. Tarihsel-jeneolojik sorgulama çizgisinin, farklı çoğunluk dinlerine sahip Fransa ve Türkiye arasında ortak bir laiklik siyasi alanı olduğuna dair pek çok kanıt sunduğunu gösteriyorum. Bu siyasi alanın bir parçası, her iki ülke bağlamındaki siyasetçilerin sıklıkla kendi ülkelerini diğer ülkelerle karşılaştırmaları ve birbirlerinin karşılaştırmalarına karşı çıkmalarıdır. Bir Avrupa ülkesi ile bir Orta Doğu ülkesini karşılaştırmanın ve bu bölgeler arası karşılaştırmanın bir parçası olarak siyasetteki tartışmalı karşılaştırmaları belgelemenin, çoklu modernlikler yaklaşımının temel önermeleri üzerine eleştirel düşünmek için sağlayabileceği analitik ve teorik getiriyi anlatıyorum.

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1. Introduction

My general line of approach in this article follows Giovanni Sartori: "one who knows one country only knows none," (Sartori 1991, 45) or one who knows one region only knows none. I present what an interregional comparison—France and Turkey—can tell us about the secular through various primary sources, focusing on education and state funds for religion infrastructure. Even if coterminous similar outcomes are less frequent between Europe and Asia, it is possible to find distinct as well as common features, issue-areas and dynamics, particularly if one highlights struggles and losing options. The frequency of commonalities can be increased by the choice of the historical period under focus and particularly by asynchronic comparisons (Forrest 1994). I also address a theoretical and methodological question that is a byproduct of the comparison and the depth of the primary sources I use: how can we weigh and balance analytical categories of analysis and local meanings against each other? In other words, what tensions and dialogue exist between the analytical and hermeneutical schools? (Chakrabarty 2000)

My main argument is that the difference in majority religions of France and Turkey—Catholicism and Islam—is overplayed in accounting for their respective institutional trajectories of secularism, at the expense of the dynamics of the political field of secularism these countries share. My focus is on methodology, theory and empirically grounded hypothesis generation. I draw examples from the cases of France and Turkey towards this purpose, and I don't aim at a comprehensive or up-to-date account of secularism in these countries.[1] I call for laying out the politics of secularism and religion, rather than embracing easily available sociological claims of secularization or desecularization. However, I also underscore that laying out this political field requires a fine balance between tracking the concepts and arguments used by the various societal and state actors concerning secularism and religion in the context of study as opposed to seeking our own typologies, and aiming to weave the former into an analytical narrative which surpasses their particular positions without assuming that the narrative is necessarily confined by national or cultural limits or a national social imaginary. By political field, I designate the set of actors in struggle, their competing goals, plans and calculations for reaching these goals, the causal chains they see between certain institutions and goals under certain contextual constraints, and the public arguments they advance in pursuit of their goals. Sometimes this political field can be visible within the confines of a parliament and sometimes one has to turn to societal organizations to render visible its remaining parts; sometimes one also has to move back and forward in history to locate it. The political field is most visible during *potential moments of institutional change*, because these are the moments where the possibility of directing change increases the number of actors involved and their level of engagement. This enhanced level of engagement parts the curtain and allows a peak into some of the less visible parts of the political field. The actors of this political field in both countries are those who want to mobilize religion, those who want to demobilize religion and those who want to keep the state neutral towards religion. I show this from moments of institutional change: *Loi du 9 Décembre 1905 concernant la séparation*

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[1] For an up-to-date account of desecularization under the AKP authoritarianism, see Akan (2023). For the current state of laïcité in France, see Akan (2021). My contention is that the political field designated in this article is also capable of accounting for a significant portion of the recent developments in France and Turkey.

des églises et l'Etat (1905 law on the separation of churches and State), *Loi du 28 Mars 1882 sur l'enseignement primaire obligatoire* (1882 law on compulsory primary education), and from contemporary France, debates on *laïcité* around the *Commission de réflexion sur l'application du principe de laïcité dans la République* (committee on the application of the principle of secularism in the Republic) (2003), *Türkiye Büyük Millet Meclisi Tutanak Dergisi* (Record of the Turkish Parliament) and other primary sources on the early Turkish republic, later restructurings by the Republican People's Party (*Cumhuriyet Halk Partisi,* CHP) and the Turkish military of the Directorate of Religious Affairs and of religion and ethics courses in public schools, and the religious policy of the Justice and Development Party (*Adalet ve Kalkınma Partisi*, AKP). Moreover, this political field in France and Turkey, and perhaps also in other places, is replete with comparative statements by political actors, comparing their own country with other countries. This article attempts to lay out systematically what is "political" about these comparisons, and the theoretical significance of this "political" for a methodological debate so central to area studies: the struggle and the dialogue between the analytical and the hermeneutical schools.

2. The struggle and dialogue between the analytical and the hermeneutical schools, and multiple modernities

With a research line emerging from Edward Said's *Orientalism*, the shortcomings of narratives that situate the East via what it lacks or as without agency or as derivative has been traced to their privileging an analytical framework emerging from European categories of thought over the fuller narrative, which would require more attention to local meaning, experience, fragments, and interaction (Said 1979). This approach has opposed narratives of the East as a place defined by a lack and imitation both in their Marxist and liberal versions. Some examples that immediately come to mind are Partha Chatterjee's non-derivativeness of nationalist thought in India (Chatterjee 1986) or Peter van der Veer's "interactive histories" between India and Britain which aim to "reject the common assumption…that the metropole is the center of cultural production, while the periphery only develops derivative, imitative culture" (Van der Veer 2001, 3). Various area studies, such as Middle Eastern, Asian or African, have suffered under orientalism. If we approach orientalism as a radical version of social science concepts detached from the phenomena they were supposed to describe, there is in fact no reason to confine this debate on the tensions between conceptualizations and facts, local meaning, and interaction to particular area studies. Giovanni Sartori (1970: 1038) had argued how a "concept formation" debate is prior to all other methodological debates in the social sciences, because "concepts of any social science are not only the elements of a theoretical system; they are equally, and just as much, data containers" (Sartori 1970, 1039). He had underscored how comparative research shows a particular version of the tension between concept and experience which Sartori had called the "travelling problem of comparative politics" (1042): we engage in "concept stretching" so "that we can cover more –in travelling terms—only by saying less, and by saying in a far less precise manner" (1035). For instance, the post 9/11 comparative and political theory scholarship on secularism worked with a binary distinction between radical and moderate secularism which obfuscates many facts, dynamics and vocabularies of various historical and contemporary struggles. This binary is unable to capture the distinctness of the undeniable role played by Socialists in the making of the 1905 French Separation Law; it even glosses over this Socialist articulation of secularism. Charles Taylor, whose approach to secularism relies on the

radical versus moderate distinction, only mentions the socialist architects of the 1905 French law, Jean Jaurès and Aristide Briand, in passing (Taylor 2011). Ahmet Kuru (2009) classifies these socialists and Turkey's Islamist AKP as examples of moderate, in his terms "passive secularist," which is simply confusing, or in the words of Sartori, a "misclassification" (Sartori 1991, 248).

One way to tackle these moments of divergence and mismatch between concept and evidence has been to equip our approaches with more hermeneutical sensitivity. Dipesh Chakrabarty underlines succinctly in *Provincializing Europe*, the struggle between the analytical and the hermeneutical schools of thought (Chakrabarty 2000). Many of the challenges to master narratives have taken a hermeneutical turn; that is, in their research, these challengers have carved out a considerable space detailing local meanings. In the academic field of secularism, this debate has played out in the following way: analytical approaches have described any institutional deviations from an atemporal model of separation outside of Europe as anomalies and attribute them to sociocultural variables. The more hermeneutical approaches have documented how secular political actors comprehend institutional arrangements in their specific contexts of production, and assert that the institutional differences qualified by the analytical approaches as anomalies make sense from the point of view of the actors who built the institutions. The analytical approaches displace anomalies to the outside of Europe; the hermeneutical approaches encapsulate the anomalies in a specific understanding of secularism, leaning towards a conclusion of distinct worlds, such as an "Indian meaning" or "Turkish meaning" of secularism, and in its extreme form to a thesis of exceptionalism. Both lead to a deadlock for comparative research by preempting the possibility of investigating common grounds between Europe and Asia. Moreover, both encapsulate politics in a meaning world; that is, they open the way for a new form of culturalism.

Shmuel N. Eisenstadt's article on multiple modernities represents the current form of the hermeneutical turn in secularism studies with Turkey as one of its critical cases. In explaining multiple modernities, Eisenstadt emphasizes the new meanings European modernity attains in various contexts:

> The appropriation by non-Western societies of specific themes and institutional patterns of the original Western modern civilization societies entailed the continuous selection, reinterpretation, and reformulation of these imported ideas. (Eisenstadt, 2000: 15).

A significant portion of the post-9/11 research on secularism claims to follow the multiple modernities approach. Yet the micro-level focus on moments of re-interpretation at the moments of interaction between non-Western and Western modernities that the above excerpt suggests is ignored. Instead, in the name of multiple secularisms, we receive Weberian ideal types, or claims to – rather than a demonstration of-- distinct meanings of secularism, or national social imaginaries standing in for the "multiplicity." Charles Taylor's *A Secular Age* (2007) is a case in point. In it, Taylor fuses his "social imaginary" into Shmuel Eisenstadt's "multiple modernities" thesis. For Taylor, the multiple modernities thesis is most visible at the level of "social imaginaries," because "it is on this level that local particularities most clearly emerge" (Taylor 2004, 1). "We have to speak of 'multiple modernities,' different ways of erecting and animating the institutional forms that are becoming inescapable" (195). Here, Taylor uses the term "social imaginary" in a very specific way. Social imaginary is neither a social theory that is mostly in the possession of an elite, nor simply ideas.

Rather it is the set of ideas that constitute actions and institutions; how ordinary people ''imagine'' their social surroundings, "that common understanding which makes possible common practices" (Taylor 2007, 171-2). This is a very important thesis, but very difficult to confirm for a whole society. How ideas, practices and institutions interact in different contexts is a major question in all fields of social sciences, and I would suggest that it would require some form of well-thought-out anthropological or historical approach at a micro level, centering around specific subjects, which Taylor does not offer, as his approach is confined to philosophy and history of ideas. "Meaning", as Taylor (1971: 41) had affirmed in his earlier writings, "is for a subject: it is not the meaning of the situation in *vacuo*"; however, when we move from addressing meaning for individuals and specific groups towards talking about meaning for a whole society in the form of a "social imaginary," we come close to addressing meaning "in vacuo." Neither the thesis that there are multiple imaginaries in a society nor that there are overlapping imaginaries across societies can be dismissed from the start. Centering *a comparison* on "a national imaginary" poses even further difficulties (Akan 2017a).

Talal Asad's response to multiple modernities is particularly significant because he defends the historical-genealogical line of inquiry defended in this article.

> Many critics have now taken the position that 'modernity' (in which secularism is centrally located) is not a verifiable project. They argue that contemporary societies are heterogeneous and overlapping, that they contain disparate, even discordant, circumstances, origins, values, and so forth. My response is that these critics are right . . . but that what we have here is not a simple cognitive error. Assumptions about the integrated character of 'modernity' are themselves part of practical and political reality. They direct the way in which people committed to it act in critical situations. These people aim at 'modernity' . . . This fact doesn't disappear when we simply point out that the 'West' isn't an integrated totality . . . (Asad 2003, 13)

Asad leaves us with an image of the non-western political elite encapsulated in the idea of modernity, and again downplays the political field outside the west through a particular hermeneutical turn, a claim to the elite's *understanding* which includes "aiming at modernity."

Interregional comparison offers an alternative to encapsulating politics in meaning worlds and testing many of the propositions I have laid on the table so far, but not any interregional comparison. Timothy Mitchell attempts to build theoretical conversation among different area studies in order to go beyond the parochialism emerging in area studies. Many scholars, he explains, returned to "general themes" and "forms of explanation that claimed to apply to any context" as the alternative path to area studies becoming "parochial." But he explains that in distinguishing the interregional comparison path, "we were scholars for whom social theory was reached through the imaginative worlds of particular communities, places, and histories" (Mitchell 2000, p. viii). However, the collected essays in *Questions of Modernity* present separate case studies without a clear and explicit indication of how much they speak to each other. Plus, what if the "imaginative worlds" in question overlap or coincide? This is also true for recent collections of essays on secularism. *Visualizing Secularism* makes a case for interregional comparison but still "investigate [s] the *unique* ways in which it [secularism] has been institutionalized in...India, Turkey, Lebanon, or Egypt" (Çınar, Roy & Maha, 2012: 1, italics mine). *Comparative Secularism in A Global Age* also makes an attempt at interregional comparison, on

France, India, Turkey and the United States, but again aims "to illuminate the *distinctive* formations and traditions of secularism" (Cady & Hurd 2010, p. vii, italics mine). Uniqueness and distinctness are not necessarily the only conclusion of interregional comparison; in fact, such a conclusion reproduces the problems of area studies (Bayat 2001) to which interregional comparison was supposed to provide a solution. That some of these works only reach as far as theses of distinctness is related to the depth of their analytical framework and the research material they use. I pursue a more tedious but manageable goal than chasing wholesale comparative hypotheses on nation-states. Through primary sources and a more detailed analytical framework, I focus on how arguments, political ends, and institutional choices interact at moments of potential institutional change in Turkey and France. My micro focus on arguments –local logics and reasonings-- is crucial because this makes the focus on meanings specific as opposed to claims on meanings in vacuo as well as allowing for the possibility of testing whether these local logics and reasonings are distinct or common across contexts.

My focus follows a snail's trail that has been left in Chaterjee's (1998) essay "Secularism and Tolerance." Here, Chatterjee explicitly seeks an alternative to the "new meaning of secularism in India" as a research path:

> I will not take the easy route of appealing to an "Indian exception." In other words, I will not trot out yet another version of the "new meaning of secularism" argument. But to avoid that route, I must locate my problem, on a ground which will include at one and the same time, the history of the rise of the modern state in both its Western and non-Western forms. I will attempt to do this by invoking Michel Foucault (365-6).

He ultimately includes a concept, Foucault's "governmentality," unsurprisingly more *general* in its scope and therefore capable of forming a general analytical framework which can encompass India and Europe together, and offering a potential to accommodate both for particularity and generality. However, his essay, a short piece given the vast question, hints at a research agenda rather than taking it to completion. An incomplete aspect is that Chatterjee discusses the interference of the Indian state in the sphere of religion in the name of secularism under the heading "anomalies of the secular state" in India. However, the anomalies of the secular state are in no way Indian or non-Western specific, particularly given the past two decades of various Western states' conspicuous intervention in the sphere of religion. Federal funds in the United States have supported religion nationally and internationally, especially through the White House Office of Faith-Based and Neighborhood Partnerships, established by an executive order in 2001 (Ekşioğlu 2011). Saba Mahmood highlights a White House National Security Council program, Muslim World Outreach, that involves "training Islamic preachers" and "establishing Islamic schools" in certain countries (Mahmood 2006: 331). European states have actively engaged in the religious sphere in the past decades with the formation of Muslim Councils (Akan 2017b).

The shift to more general frameworks, "power" in particular, is also present when we turn to the claim for writing post-Orientalist histories. While there is on the one hand post-Orientalist histories' assertion of "anti-foundational" historical narrative (Prakash 1990); on the other hand, "this scholarship is marked by its attempts to make cultural forms and historical events contingent, above all on *power relations*" (401, italics mine). In fact, both Chatterjee and Prakash's paths call for a systematic comparison of Europe and non-european countries. This is the only way to test the particular meaning thesis vis-à-vis Europe and to ground the narrative on power beyond

culturally specific meanings. Vivek Chibber (2013) has pointed out how the subaltern studies school, to which both Chatterjee and Prakash have contributed, in searching for a non-eurocentric narrative of India work with a stick figure image of Europe. I would like to add that they reach their limit in struggling with eurocentrism precisely in their lack of systematic and detailed interregional comparisons between non-European and European countries.

A way to address this debate between particularities and general frameworks is to find questions that may help us approach general abstract frameworks through particular histories, and drive cultural difference and perhaps also historical difference both to their limits, as I understand Chakrabarty's (2000: 26) "to take history, the code, to its limit." What role do particular histories, religious tradition, and imaginaries play in potential moments of institutional change concerning laiklik/ laïcité in Turkey and France compared to the role played by a dynamic of politics common to both countries through time?

3. Lessons from Old Turkey and Old France

Authoritarianism in the single-party era in Turkey (1923–1945) has been documented. It is clear from parliamentary discussions at critical moments that the Republican People's Party's (CHP) institutional choices on religion stemmed from their political goal to prevent religion from becoming a force of counter-mobilization against the republican regime while instituting a "national Islam." In a speech in January 1923, Mustafa Kemal stated that "our religion is the most reasonable and most natural religion, and it is precisely for this reason that it has been the last religion. In order for a religion to be natural, it should conform to reason, technology, science, and logic. Our religion is totally compatible with these" (Parla and Davison 2005: 110). In his famous speech delivered to the Turkish nation over three days in October 1927, Mustafa Kemal explained that while the constitutional amendment of October 29, 1923, declaring the founding of the Turkish Republic, also included an article (article 2) declaring Islam as the state religion, this was only "with the purpose of not providing an opportunity for those who are inclined to interpret the phrase 'laic government' as antireligious," and asked that state religion be removed from the constitution at the first opportunity (Kemal 1999: 955-56). On March 1, 1924, two days before Parliament passed laws abolishing the caliphate, creating a public education system, and establishing the Directorate of Religious Affairs (DRA) – the state institution of state salaried imams--, Mustafa Kemal remarked that the aim was to "liberate" Islam from becoming a "means of politics" (TBMM 1924, 27-69). On March 3, during the parliamentary discussions on abolishing the caliphate, the minister of justice in fact saw the lack of a clerical government in Islam to match the Vatican as an advantage in the race to progress and to reach the level of contemporary civilizations (TBMM 1924: 50, 60).

State religion was removed from the constitution on April 9, 1928, by a vote of 264 to 51 (TBMM 1928: 117). This removal was depicted in the foreign press as the abolition of religion in Turkey (Adıvar 1929). The constitutional change was presented as another step toward the *laik* state; however, it was followed immediately by a cautious preemptive argument on how *laiklik* was not being antireligious (TBMM 1928: 2). Halide Edib Adıvar, a well-known republican novelist, commented on the removal of state religion from the constitution in her article in the *Yale Review*, pointing out that institutional separation in Turkey was still incomplete as long as the DRA was a state institution (Adıvar 1929: 37-38). On February 5, 1937, the term *laik* was put in the constitution, religious orders were removed from the protection of article 75 on the

freedom of conscience, and the freedom of philosophical opinion was now listed before freedom of religion. There were few critics within the party of the state budget for imams or how it contradicted *laiklik*; such criticism was met with silence (TBMM 1937: 62). The Union of Education Law closed down religious schools (*medrese*) and established a unified national education system. The 1924 law stipulated one hour of religious instruction per week in the third, fourth, and fifth grades of primary schools, but in the same year, religious instruction in secondary schools was reduced from a compulsory three hours to one hour per week. In 1928, compulsory religious education in secondary schools was completely eliminated (Okutan 1983). In 1930, primary school religious instruction was reduced to an optional half-hour in the fifth grade, and in 1931 it was completely eliminated. Twenty-nine İmam Hatip schools (four-year secondary schools for the education of Muslim clerics) were established in 1924 in place of the medreses (Çakır et al 2004: 57) in order to train imams and preachers loyal to the Republic. The number of İmam Hatip schools declined steadily from 1924 until 1930 due to a lack of students, and in the 1929–30 academic year, they were all closed. The Faculty of Theology at Istanbul University was closed in 1933 after a report by a European scholar, Albert Malche (1939) documented the small number of registered students.

The dynamics I have just laid out, the political end of confining religion to outside politics through an institution of state salaried imams, the unifying of education with optional courses in religion, the Kemalist republicans repeated statement on not being "anti-religious," expose local logics and dynamics, in the sense that they are from specific moments in Turkey. However, if we move to a comparison with the French Third Republic, significant similarities emerge; that is, these dynamics and logics are not local in the sense of only being specific to these moments in Turkey.

Républicains opportunistes in the Third French Republic show a significant resemblance to the early Turkish Republic's Kemalist CHP. Jules Ferry, who served as minister of education and as prime minister between 1879 and 1885 and who is known as the architect of public education laws, defended the *Concordat*[2] with the Vatican. The Concordat recognized Catholicism as the majority religion in France and required the French state to pay for clerics' salaries. At the same time, however, Ferry pushed for the separation of education from religion and demobilized religious congregations that were not under the control of the Vatican. This three-level policy strongly resembles early Kemalist CHP policies, except for the fact that the French state paid the salaries of a diverse set of religious personnel including, besides the Catholic clergy, Reformed and Lutheran clergy since April 1802, Jewish rabbis since February 1831, and the Muslim religious personnel of Algeria since 1881. The theoretically interesting point vis-à-vis my earlier discussion is that it is absolutely not evident that the more we unearth particular micro level narratives, the more Turkey and France look different. To the contrary, they become part of a general overlapping narrative rather than becoming further differentiated. The *Loi du 28 Mars 1882 sur l'enseignement primaire obligatoire* did not include religious instruction in the public school curriculum but instead provided a free day during the week for those parents who wanted their children to receive religious instruction outside school. Jules Ferry expressed his position openly in various discussions in parliament. In the early 1880s, he underscored that, "What we aim at are only the unauthorized congregations" (Quoted in Gaillard 1989: 434). When criticized for the perceived inconsistency of separating education from religion with the

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[2]The Concordat was a bilateral agreement that the Catholic Church established with nation-states for managing the place of Catholicism within the law and borders of national sovereignty.

1882 law of public education but still keeping the Concordat, Ferry responded in the *chambre des deputés*:

> **Mr. le président du conseil [Jules Ferry]**. . . . When our fathers of 1789 substituted a salaried Church for a property-owner Church, they have made an act of wisdom and foresight … your politics, in the relations of the Republic with the Church, have been very resolutely anticlerical, it has never been an antireligious politics. (Excitement from right. — Applause from center.) (Journal 1881: 1047)

> **Mr. le président du conseil [Jules Ferry].** He [Mr. Lockroy] said in his last speech: You see a strange situation! You have separated the school from the Church and you do not want to separate the Church from the State! … if there is a contradiction in the state of our law, it is that this contradiction exists profoundly in the mental state and morality of the population which we represent. (Very good, very good!).

One can locate above precisely the exact same caution the early Republic's Kemalist CHP stated against being anti-religious and the same contradiction between paying religious personnel while secularizing education. *Républicains opportunistes* struggled with monarchists, the left and opposition from their own ranks in the making of the Law of 1882. They dominated the Chamber of Deputies and were able to pass the law as they wanted it. It is crucial, however, to look at the losing arguments and institutional options, in order to lay out the struggles in a fuller narrative for the comparison with Turkey and, most important of all, to test further whether a focus on details with primary sources leads us towards general frameworks that drive cultural difference, and perhaps also historical difference, both to their limits, or to distinct histories.

A report prepared by Paul Bert on education started the chamber discussion on the bill. The report defended free compulsory public education from the premise of diversity: "It is good and necessary that the children of Jews, Christians, and free-thinkers encounter each other on the same benches and make a habit of mutual respect and tolerance" (Bert 1880: 15-17). The report counterpoised the premise of diversity against what it termed the "law of majorities" fervently defended by monarchists in the Chamber: "it is necessary above all that a religion does not invade this education in the name of the majority. Because, we are here in the domain of conscience, at the threshold of which the law of majorities stops." In the Chamber discussions, "neutrality," "diversity," and "law of majorities" emerged as the key ideas defining the political field. "Neutrality" was at the center of the discussion, and the main axis of debate was between those political actors arguing from the "premise of diversity" for institutional neutrality and those arguing for the "law of majorities" against it. Mr. Freppel from the monarchist group clearly stated this: "There are in France 36 million Catholics against less than 2 million dissidents […] Laws cannot be made for the exceptions" (Journal 1880a: 12676-7). Jules Ferry countered, "It is always by the argument of majorities that all the conquests made by liberty of conscience in our country have been demolished […] the argument of the majority is like the religion of the majority, which resembles […] the religion of the state" (Journal 1880b: 12791). The monarchists' position on neutrality was not one of re-interpretation but a direct rejection. As monarchist Ferdinand Boyer stated, "neutrality is impossible in these matters," (Journal 1880c: 12525-6) or as monarchist Mr. Keller put it, "I do not believe in neutrality" (Journal

1880d: 12623).

There was also another kind of opposition, which receives much less attention in contemporary discussions, from Republicans who argued for not teaching a particular religious tradition in the public school but talking about God as a source of morality. I find no better term than state-civil religionism to describe this position; that is, a religion abstracted from specific religious traditions, and promoted by the state as a cement of society. Henri de Lacretelle from *Union républicaine*, one wing of the governing *Républicains opportunistes*, stated, "I confess, sirs, I have been often tired of hearing the great word 'God' pronounced exclusively by the right […] God also belongs to us, it belongs to the Republic (Laughs to the right) […] I believe that we improve the moral physiognomy of the Republic in inserting the word 'God' in a law which we make for the people" (Journal 1880a: 12683). He added that this is crucial in raising future citizens and soldiers. Another Republican speaker with similar politics presented such religious-moral teaching as a bulwark against "the industry for developing an excess of taste for material well-being" (Journal 1880e: 12433-4), and argued with comparative references: "there isn't a free nation, Switzerland, Holland, England, America—I take, sirs, all the advanced countries in primary instruction—where the priest doesn't have access to school for giving religious teaching when it is the wish of fathers of families" (Journal 1880a: 12801).

Looking at these failed institutional options and arguments in their defense is important, because the *Républicains opportunistes* and Kemalist CHP convergence I highlight does not last if we include the later moments of the Turkish Republic in the comparison. Neither, in fact, did Jules Ferry himself hold his overall political position; he shifted to a more conservative Republican group, *Républicains progressistes*, towards the end of the nineteenth century. Yet the losing options in the French Chamber of the 1880s are found as winning options in the Turkish parliament of the late 1940s, and the winning options of France can be found scattered among parliamentary and societal opposition at certain moments in Turkey, hence, supporting my argument for a shared political field.

The first major opposition to the CHP was the Democrat Party (DP), founded on January 7, 1946. Socialist parties were also among the new parties formed with the transition to a multiparty system. Although the socialists did not have much presence on the political scene, their mere existence was sufficient to influence CHP policies in the international atmosphere of the Cold War. At the time, the CHP and DP were accusing each other of being soft on the left, and on December 16, 1946, the Turkish Socialist Party and Turkish Socialist Workers and Peasants Party were banned by martial law. In the parliamentary elections of July 21, 1946, the DP gained 66 seats (compared to CHP's 395). In the elections of May 14, 1950, the DP had 408 seats, CHP 69 and Nation Party only one. The period from 1946 until 1950 was the CHP's return in its institutional policy to religion as a cement of society—a policy which I have also located above in the French Third Republic and called state-civil religionism. Both the CHP and the DP started from the premise of a Muslim majority society in working out their policies on religion – the precise majoritarian premise that was defeated in the Third Republic--, and the struggle between them was a tug of war confined to different degrees of state-civil religionism. The CHP's politics started diverging from the majority of the *Républicains opportunistes* and started resembling that of Lacretelle quoted above and of the *Républicains progressistes* of the later Third Republic.

In 1947, the CHP provided funding for the hajj to Mecca, and in 1949 it included optional religion courses for fourth- and fifth-grade primary school students to be administered on Saturdays. The CHP also reopened the Imam Hatip schools. In 1947,

it almost doubled the budget of the DRA. The parliamentary discussions of December 24, 1946 on the national education budget already gave some clues as to the nature of this return to religion and CHP's Seventh Party Congress (1947) on November 17, 1947 presented ample further evidence. Both discussions portray an internal CHP debate only, because the DP parliamentarians were not present in parliament at the time. They had boycotted budget discussions by leaving parliament a week earlier and had still not returned. Some exemplary arguments from within the CHP for state investment in religion were: "Consciences and hearts are like homelands. If they are left vacant, they will be occupied by the enemy. We are not afraid of these new religions [communism], but we are afraid of our own religion"; "Religion has an otherworldly side, and also a utility side" and this utility of religion was "a way of improving public morality"; and "If Atatürk were alive, he would also do the same" (TBMM 1946: 428). Counter arguments for state investment in religion included: "the one and only means for the protection against the mentioned poison [communism] is the feeling of the nation. (Bravo, applause.) To insist that a […] devout Muslim will not turn communist, or that religion in general provides a resistance to communism, is in contradiction with the realities of the day" (445-6).

There were also comparative statements, such as: "During the Combes government, France separated religion from the State, but it was allowed that all institutions belonging to religion are kept alive by the public […] There are seminaries, in other words, medreses, in Paris. The French public satisfies its religious needs by its own organization" (439). Such a comparative remark obviously obscured the level at which religion is organized by presenting the societal organization of religion in France as an argument in defense of state investment in religion in Turkey. Such a focus on *society* in Europe for justifying new institutional arrangements in Turkey was countered by a focus on *institutions* in Europe and the US: "When does the State give money to the church in America, would you tell me? The Catholic universities in Belgium, don't they receive the money from the Pope?" (459) These contested claims on Europe, what I have called contested comparisons, present concrete evidence that politics was not confined to meaning worlds in neither its Taylor version of confined national imaginaries or in the Asad version of an "integrated" idea of European modernity outside Europe.

The utilitarian institutionalization of religion peaked with the Kemalist military's constitutionalization of required religion courses in the 1982 military constitution, precisely in order to make sure that "Instead of […] Lenin, Mao, and Castro, let's teach the Turkish child his/her religion in a real sense and under the license of the state within the principles of Atatürk" (Danışma 1982: 275). This was again combined with references to Europe, made by the coup leader: "When I was in Brussels, a child of an acquaintance was in second grade. At school, they were taking the Muslim children out during that [religion] session, and taught the principles of Christianity to the rest of the children, they don't take Muslims; but those who want can attend. They also have it, they give culture of religion" (Milli Güvenlik, 341).

Such struggle in various moments in Turkey over the *social* versus *institutional* understanding of European countries corresponded to the particular political ends and the concomitant institutional preferences of their defenders. Politics penetrated and bifurcated the understanding of Europe. The competing understandings of Europe held by competing political groups were especially visible in the writing of the 1961 Turkish constitution (Akan 2011). What is interesting from a comparative perspective is that the debates over the United States of America in the French chamber, in newspaper discussions and in commission reports on the 1905 law of separation in France were

also a struggle between *social* versus *institutional* understandings of the U.S., each side corresponding to particular political interests.

In the making of the *Loi du 9 Décembre 1905,* we find both some recurrent political currents vis-à-vis the analysis of France and Turkey presented so far, and some novel ones. The law passed in the Chamber by a margin of 108 votes; that is, it would have taken 55 votes to change sides for a failed outcome, a fact that grants the political field its autonomy. We find here the two camps that have been presented so far in both Turkey and France—those who want the state to institutionally mobilize religion and those who want the state to institutionally demobilize religion—plus a much stronger claim to institutional neutrality. The report prepared by socialist parliamentarian Aristide Briand anchored the discussions in Parliament. The report clearly presented the premise of diversity as the main reason for institutional separation "in order to institute the only regime where peace can be established between followers of diverse beliefs" (Briand 1905: 5). The report compared France with other countries, but particularly highlighted the comparison with the U.S., starting out with a claim that "the principle of laïcité and of neutrality of the State is established in the federal constitution" (202), and continuing with an *institutional* analysis of the U.S. Such analysis of the U.S. stood in stark contrast to the analysis of the U.S. offered by the main opponents of the separation law, the political Catholic *Action libérale populaire* (ALP) and the center right *Républicains progressistes* (RP). The ALP refused any separation law outright, and RP refused it unless there was a legal guarantee that the returned church property would go to bishops in the ecclesiastical hierarchy and not to any collectivity of Catholic citizens. Finally unconvinced, the RP voted against the law along with the ALP. Albert De Mun, the political Catholic leader, wrote on February 12, 1905 in the newspaper *Le Gaulois*: "America is invoked! This is the decisive argument. Tocqueville wrote sixty years ago, 'religion which for the Americans never directly mixes with the government of society, should however be considered as the first of their political institutions'; and, yesterday, President Roosevelt said, 'The future of our nation depends on the way we combine force with religion.' Here it is! The mental state of American democracy. Is it ours?" (Mun 1905: 76-7). Alexandre Ribot, the leader of *Républicains progressistes*, commented: "We said that, like in America, we are obliged to let the Catholics themselves take care of tracing the rules of their organization" (Journal 1905: 1607). These were *sociological* rather than *institutional* analyses of the U.S. *Radical socialistes* who defended the separation law and argued that any collectivity of Catholic citizens could reclaim the returned property, and who also had some members referring to the U.S. For example, Mr. Vazeille stated: "For me, I consider that it is the Catholic citizens, that it is the collectivity of Catholic individuals grouped in association who have the right to this patrimony; it is not such and such bishop sent by Rome […] The example of America has been cited; I do not know that in America, it would be the Catholic bishops who arrange absolutely the goods of the community!" (1609).

The law ultimately passed owing to the successful maneuvers of the Socialist parliamentarians, with an amendment to Article 4 on the returned church property appeasing the competing political sides, one pushing state demobilization and the other the mobilization of religion.

Lessons from Contemporary Turkey and Contemporary France:

The overlapping political field laid out so far, with the significant difference that defenders of neutrality are scarce at potential moments of institutional change in Turkey, is still present in contemporary Turkey and France. The competing actors in this

political field, depending on their relative power and the existing institutional equilibriums, defend or challenge the different status quos, that of institutional separation in France and state investment in religion in Turkey. The institutional changes coalescing around the ban on visible religious symbols in France recommended by the report (2003) of the Committee on the application of the principle of laïcité in the Republic, which culminated in Nicolas Sarkozy's defense of *laïcité positive* resonating particularly with the Pope himself, has been convincingly defended by Jean Baubérot (2009) as a regression towards the option of civil religionism which had been defeated in the Third French Republic. It was noteworthy that during the institutional changes—targeted or accomplished—accompanying the ban, references to Turkey were rampant. These changes included (1) the establishment of the French Muslim Council and France's first new Muslim high school in the summer of 2003; (2) an emerging movement, including the governing political party UMP, to reintroduce "factual" teaching of religion in public schools; and (3) Interior Minister Nicolas Sarkozy's mobilization of *laïcité positive*.[3] The report's comparative perspective on France was limited to a brief discussion on certain decisions of the European Court of Human Rights. This brief review underscored that "the approach of the Court rests on a recognition of the traditions of each country, without seeking to impose a uniform model of the relations between Church and State." The report cited a total of six European Court decisions: Cha'are Shalom ve Tsedek v. France (2000), Dahlab v. Switzerland (2001), Refah Party and others v. Turkey (2003), Kalaç v. Turkey (1997), Karaduman v. Turkey (1993), and Valsamis v. Greece (1995). Yet these cases differ not only in context but even more so in subject matter. The topics involved ranged from individual behavior to civil society organizations and political parties: an organization's ritual slaughter, a Muslim primary school teacher wearing a headscarf in the classroom, political party activity, the religious belief and practice of a military officer, identity photos and university diplomas, and religious practice and school rules. In fact, the variation in "national tradition" was quite limited, since three out of the six court cases cited were from Turkey, and in all the three cases, the European court had ruled in favor of the Turkish state. Such comparative references to Turkey in the report were echoed here and there in the media and academic works, sometimes reaching back as far as the Ottoman Empire to make analogies with the empire's millet system. Such references are theoretically significant and mark a new element of the political field, because they mark a reversed path of "traveling" vis-à-vis the "modernities," and "multiple modernities" discussions, which focus only on traveling out of Europe.

As Baubérot highlighted a regression to civil religionism in contemporary France, contemporary Turkey had its own regressive trajectory. However, in the case of Turkey, the regression was more than a tendency. For once, it started regressing *from* a state-civil religionist equilibrium. To describe a regression from state civil religionism, we must pay attention to two other processes: *de-abstracting* and *expanding* the scope of religion. The religious-culturalist arguments for the rise of the AKP were challenged by the level of activism the party engaged in for votes and for extending its hegemony while in government (Tuğal 2009). One such attempt was the Alevi workshops the AKP organized in the name of the "Democratic Opening" initiative in 2008, which resulted in anything but a democratic opening. This was a crucial event because it also laid bare the heterogeneity of Turkish society and the incomplete reality of the argument from a "Muslim Majority" country—exactly the same as the "law of majorities" argument

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[3] Sarkozy (2004: 16) explains: "I believe in laïcité positive, that is to say a laïcité which guarantees the right to live one's religion like a fundamental personal right. Laïcité isn't the enemy of religions. Quite the contrary. Laïcité is the guarantee for each to be able to believe and live his or her faith."

defeated in the Third French Republic—which constituted both the AKP approach to institutional relations between state and religion and the Kemalist approach at most of the moments of institutional change in the history of Turkey. Various Alevi Organizations agreed on the failure of Turkey's institutions in terms of neutrality, pointing out the state's promotion of Sunni-Islam, and stated clear institutional demands for a solution. However, following the workshops, more policy and institutional changes materialized against, rather than for neutrality. A constitutional referendum in September 2010, right after the workshops, kept constitutional Article 24 on mandatory religion and ethics courses intact. The new law for the DRA, passed in July 2010, strengthened the state's infrastructural monopoly over religion, and increased the hierarchies within and the salaries. With the AKP, religion has been expanding in its policy areas, endangering a secular regime's institutional principle of differentiation of spheres. The DRA currently has five protocols signed with other state institutions concerning social policy, and four of these were signed under the AKP government: with the Ministry of Justice on religion courses in prisons (March 30, 2001); with Social Services and Childcare (February 26, 2007) for providing religious personnel to these institutions and to have imams communicate the importance of these institutions to the public; with the Family and Social Research institution (March 13, 2008) and with the Health Ministry (December 14, 2009) on mother and child health and reproductive health. Another protocol was signed on April 12, 2010 between the state ministry responsible for the DRA and the state ministry responsible for women and family. These protocols were expanding the scope of religion. The two new optional courses—one on reading the Koran and the other on the life of the Prophet— added to the public school curriculum in March 2012, besides the existing required course on the culture of religion and knowledge of morality, did not respond to any Alevi demands. In February 2013, Prime Minister Erdoğan reiterated the Kemalist statist position on *Alevilik*. "It is not a religion," commented Erdoğan in a public statement, "there is only one place of worship in Islam, the mosque. *Cemevi*s[4] are places of culture" (Radikal 2013).

During the parliamentary discussion on the DRA law in July 2010, only the Peace and Democracy Party (BDP—Kurdish and Socialist party) spokesperson pointed out that neither Europe nor the U.S. had a similar institution. It was striking that the AKP had ceased all comparative references. The AKP spokesperson started his speech by referring to the constitutional place of the DRA and presented the DRA as "the reference point in the world and in Turkey for the correct understanding and the correct practice of the religion of Islam." This abandonment of comparative references calls to mind the writing of the 1961 constitution. While the 1961 Turkish constitution was being drafted, Western modernity, particularly France, was part of the political and practical reality of the Constituent Assembly. The mainstream Kemalists—there were various shades—had been defending a sociological understanding of European secularism and presenting the Turkish institutions as a means to that sociology, while the more institutionalist understanding of European Secularism was put forth by members of the Republican Peasant Nation Party (CKMP), which was defending strong religious-moral ties in society. In other words, Europe was a reference point on both sides of the spectrum. This was the case at earlier times of the AKP, even if it did not always mean what the media at the time wanted to only present as the AKP's will to join the EU. One AKP parliamentarian, arguing for a stronger DRA during the budget discussions as early as December 18, 2005, when the AKP was considered pro-

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[4] Place of worship for *Alevi*s.

European and democratic, said: "Dialogue between religions and the elimination of conflict among them is laudable, yet the competition among religions will last as long as the world exists."[5] Another parliamentarian said during the same discussion: "On October 3, 2005, we entered the starting period of the negotiations with the European Union. The strongest and most organized institutions of Europe are still churches and religious endowments."

During the making of the Education Law of March 2012, the references to *laiklik* and Europe were absent; they had ceased to be the common reference point of the deliberation which all sides of the debate had tried to capture by bringing together an argument and a coalition. There were more statements situating one's position vis-à-vis religion rather than vis-à-vis laiklik on the two new optional courses on religion. The Kemalists of the 1982 constitution had distinguished religion as culture from religion as a particular tradition in order to rationalize their defense of a required course on the culture of religion and the knowledge of morality in the public school as not incompatible with laiklik. This was similar to the move of *abstraction* from religion as a particular tradition to religion as a general morality that state-civil religionists presented in the Third French Republic as well as in contemporary France. The Education law of 2012 *de-abstracted* from religion as culture towards religion as a particular tradition by introducing courses on reading the Koran and the life of the Prophet in public schools.

4. Conclusion

The thesis of distinct worlds has to be weighed against a thesis of commensurable worlds. Claims to distinct worldviews, social imaginaries and particular histories constitute the major part of the epistemology and analytics of the wave of post 9/11 research laying down multiple secularism, and seeking moderation, both in secularism and in religion. In these research waves, old and contemporary France, and Kemalist Turkey are presented as the critical cases of rigid secularism, and the AKP's Turkey until the AKP's authoritarian turn, has been presented as the critical example of the synthesis of moderate secularism and religion. However, the lack of depth and detail of the research material relied upon, the dominance of Weberian typologies and the exclusive focus on outcomes as opposed to struggles in establishing this mapping between theory and cases, hides crucial facts on the ground. There are shared chains of political reasonings, shared political ends, shared institutional preferences and interactions across the two contexts—synchronic and asynchronic—and through time which can be exposed by a comparative history. The more I took note of and documented the particularities of speech and action in the limited sphere of moments of potential institutional change in Third Republic France, contemporary France, Kemalist Turkey, and the AKP's Turkey, the more these moments coalesced into a shared political field regardless of the differences in religious traditions, traditions that can account for the different outcomes, and include plenty of comparative references. Documenting these contested comparisons as parts of arguments in defense of institutional preferences was crucial in showing the mutual interaction across contexts in challenge of more typological approaches to cases. These contested comparisons were also crucial in delineating various political ends, because demonstrating the contestations over the description of one country by the political actors in the other country was a moment of exposing the political field. Therefore, these comparisons

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[5] Journal of the Minutes, 4th year, 35th meeting, 22nd term, December 18, 2005.

were also helpful in pointing out the limits of interpretive approaches which confine all actors in a context to the same meaning world.

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