

1. Millions of people, believers of different religions in different parts of the world, are subjected to persecution or serious discrimination because of their religion – and arguably in an increasing manner. The Pew Forum on Religion and Public Life estimates that 76% of the world’s population lives in a state with ‘high’ or ‘very high’ levels of restriction on religious freedom. When it comes to promoting religious freedom, do American and European approaches differ systematically? And if so, what is the nature of this divide and how it might be overcome? How the recent adoption by the EU of its much anticipated Guidelines for the Promotion and Protection of FoRB affect this situation? For instance, it might seem that the U.S. adopts a more bilateral approach as prescribed by the International Religious Freedom Act whereas Europe – where, until recently, each state had developed its own approach - seems to employ a more multilateral approach, using the architecture of international law and working through the EU. For that matter, it might also seem that the U.S. simply promotes religious freedom more vigorously than Europe. Is there truth to these generalizations? Or is it more complex?
2. What does history explain in the differences between Europe and the U.S.? The U.S. Constitution's First Amendment both called for religious freedom and forbade the establishment of a church. Europe, by contrast, has appeared to oscillate between the aggressive secularism of Jacobinism and the integralism of the Catholic Church prior to Vatican II. What effect do these legacies have on current differences in how religious freedom is incorporated in foreign policy? Furthermore, religious freedom is understood differently in the domestic politics of the U.S. and Europe. In countries like Germany and France, cults (like scientology) are outlawed. In Eastern Orthodox countries, religious minorities find arguably their religious freedom truncated. Can the EU balance, in its external action, the different national approaches to relationships between religion and state and, as a consequence, to religious freedom?
3. A critical difference is that religion is more state-managed in Europe than in the U.S. and is permitted a wider variety of expressions in the U.S. Most countries, however, seem to be closer to the European than the American model. Shouldn’t Europe then be better positioned to advocate a sustainable model of FoRB for countries that are not ready to accept the U.S. separation model, like Muslim-majority countries? But can the Western promotion of FoRB be realistically separated from how Islam is treated both in Europe and in U.S.? How do the two continents comparatively treat hate speech or allegedly incendiary comments against Islam, for instance? How much freedom do they allow Muslims to practice and express their faith?
4. An analysis of the emerging European approach and the U.S./European divide prepares the way to develop a multilateral approach to FoRB. This discussion, in fact, takes place at a time where there is: a) an increasing awareness that FoRB can contribute to the prevention of conflict and the fostering of a plural and inclusive society (see the two 2013 reports in the context of the growing discussion in Italy and the UK, [Promoting Religious Freedom and Peace through Cross-Cultural Dialogue](#) and [Article 18: an orphaned right](#)); b) a growing recognition in the foreign policy community of the need to engage with religions (see the US State Department Office of Religious Engagement and the two recent dialogues at [Wilton Park](#) and [Sciences Po](#)).
5. Consequently a plethora of governmental and inter-governmental initiatives have included the creation of numerous observatories, commissions, offices and panels of experts. These bodies have different aims, which sometimes reflect different conceptions of FoRB and state-religions arrangements. They can be classified as follows:
 - a) *Monitoring and informing*. A first group aims at providing information about the situation of FoRB in different countries. Monitoring social and legal developments that can affect FoRB provides public opinion with a sound basis of data and knowledge (see the [Observatoire Pharos](#) in France).

- b) *Assisting*. A second group comprises the organizations that provide legal assistance to countries that are in the process of legislating on FoRB with the aim of bringing national provision in line with international instruments protecting FoRB (see [the Council of Europe's Venice Commission](#) and [the OSCE-ODIHR panel of expert on freedom of religion and belief](#)).
 - c) *Promoting and defending*. Some bodies adopt a more assertive approach: their stated aim is to promote and, when necessary, defend FoRB all over the world. Collecting data, monitoring and evaluating activities are connected to the implementation of policies aimed at promoting/defending FoRB (see the [Office of International Religious Freedom of the U.S. Department of State](#), the [United States Commission on International Religious Freedom](#) and the [UN Special Rapporteur on freedom of religion or belief](#)).
 - d) *Engaging*. Finally, some institutions focus on the preconditions of FoRB. In their view facilitating the dialogue between public authorities and religious communities, as well as the dialogue among religious communities, is the best way to develop FoRB (see the OIC co-sponsored [Istanbul Process](#), which followed the adoption of the UN Resolution 16/18).
6. These different ways to consider FoRB are not 'neutral': each of them raises specific questions, connected to the notion of FoRB that is adopted; the relative importance of the 'human rights' versus the 'religious engagement' frameworks in the foreign policy process; the emphasis on the duties of states to respect, protect and promote FoRB versus the responsibility of faith communities to promote dialogue and tolerance; the coherence between the domestic models of managing FoRB and external approaches for its promotion; the different standards and degrees of legitimacy of the "governmental" versus the 'international organisation' reporting systems. In which way can the different approaches to FoRB be seen as complementing each other? How can the tensions and dilemmas mentioned above start to be overcome for the construction of a transatlantic multilateral approach to religious freedom?