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“Who could challenge democracy?” The Law on Religious Freedom – an expression of Romanian Democracy?

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Abstract

This paper aims to analyze the place of religion in Romanian society and politics, by focusing specifically on the process of readjusting religious freedom in Romania after 1990. Although the regulation of religious life in accordance with international human rights principles was considered one of the cornerstones of the Romanian democracy, the replacement of the communist legal framework with a new one took more than 17 years and numerous tensions among the religious actors themselves, state's institutions and civil society organizations.

The analysis of the state of religious freedom two decades after the fall of the communism in Romania reveals ambivalent developments. Despite some undeniable signs of progress, significant areas of improvement still remain. The most problematic aspects are the maintenance of the two-tier system and the financial dependence of the *culte* on the state. By making a distinction between the privileged recognized *culte* and other religious actors, by deciding which religious actor fits into each one of these categories and by offering its financial support and fiscal exemptions on this basis, the state indirectly pretends to represent the supreme instance in religious affairs, religious actors becoming annexes to state apparatus. On the other hand, by becoming dependant „partners” with the state, religious actors lacks the autonomy they need to become part of a strong civil society that is able to sustain a strong democracy and to oppose illegitimate political power.

Key words: religion and politics, democracy, religious freedom, recognized *culte*, Romanian Orthodox Church

Introduction

On the basis of the normative framework comprising various international human rights instruments - Universal Declaration of Human Rights, International Covenant of Civil and Political Rights, UN Declaration on the Elimination of all Forms of Intolerance and Discrimination based on Religion or Belief and Copenhagen Document of OSCE – we will understand religious freedom as the right of any person to choose a religion or no religion in accordance with the dictates of his/her conscience, to worship (or not) God, in the form that he/she chooses to, in private or in public, alone or in community with others, to manifest his/her beliefs in teaching, practice, observance, etc., to express and disseminate his/her thoughts, ideas and opinions by word of mouth, in writing or by any other means of divulcation (as long as it does not interfere with the rights of other persons), without any interference by the state.

One of the main implications of such a definition is that in order to set the stage for religious freedom, an independent religious sphere, apart from the state and protected by the state, has to exist. This means, on the one hand, that competing claims to religious truth has to be allowed in society, each person having the right to choose among them freely, without being discriminated against based on his/her religious convictions and implicitly, that the state should not establish a state church, treating instead equidistantly religious actors. Religious actors should be separated from the state and free to organize and exercise their ceremonies and worship without any interference by the state. This would also imply, in our view, that no one should be bound to pay taxes to support religious institutions he/she is not a member of.

By analyzing the post-communist legal framework for the freedom of religion, the country reports elaborated by some of the most important national and international human rights agencies and articles, books and interviews of some of the most prominent religious and/or political figures, our paper aims to assess the place of religion in Romanian society and politics, by focusing specifically on the process of readjusting religious freedom in Romania after 1990.

The Romanian post-communist legislative framework for the freedom of religion

Following the Revolution of 1989, a process of adapting public policies and legislation to the new democratic situation has begun, and religious freedom was one of the first issues on the agenda of the post-communist political regime. Despite that, Romania was the last of the ex-communist countries in the region to adopt a new Law on Religion, 17 years after the Revolution, to replace the 1948 bill issued by the communist regime.¹ Consequently, until 2006, religious life in Romania was officially regulated by the communist Decree 177/1948, by the 1991 Constitution (revised in 2003) and other complementary pieces of legislation.²

The Constitution of 1991, revised in 2003, guaranteed the fundamental human rights, the freedom of religion and belief included, provided they were manifested in a spirit of tolerance and mutual respect; allowed religious denominations to organize themselves freely in accordance with their statutes and prohibited the restriction in any form of the freedom of thought, of opinion and of religious beliefs; granted parents or legal tutors the right to ensure the education of minor children whose responsibility devolves on them, in accordance with their own convictions; stated that international instruments ratified by Romania and their principles with respect to religious freedom take precedence over domestic law (art. 20).

However, despite undeniable improvements, the Constitution has also perpetuated some of the previous communist regulations – such as the two-tier system – the distinction between the officially recognized and unrecognized denominations. The Constitution has actually substantiated the protection offered to the officially recognized *culțe*: they were granted the right to organize confessional schools and religious instruction in the public schools system, autonomy and financial support from the state, while other religious communities enjoyed no such protection and/or support.

Other special laws further perpetuated the protection and privileges offered to the recognized *culțe*. Law 84/24 July 1995 introduced religion as a discipline in the public schools' curricula; in 1996, Law 46 on Preparing the Population for Defense provided the exemption of the clergy and theology graduates from military training; Law 216/17 November 1998 (and Law 248/20 July 2005) entitled the clergy of the recognized *culțe* (namely the patriarch, the cardinal, metropolitans and heads of the recognized *culțe*) to diplomatic passports and service passports; Law 142/27 July 1999 granted the heads of the recognized *culțe* the status of public dignitaries and regulated state support for the recognized *culțe*.

Some forms of protection of the freedom of religion were included in the Criminal Code (Law 301/2004), and Government Ordinance 137/2000.

Obviously, it is impossible to give an exhaustive account of the pieces of law which regulated Romanian religious life during the last two decades. We mentioned some of them to offer a slight idea about the general trends. The main point was to show that although some areas of improvement could already be identified, the new Constitution and legislative pieces that regulated the Romanian religious life until 2006 institutionalized a model of the relationship between the State and the Church that perpetuated some of the previous communist regulations, namely the preservation of the two-tier system with its inherent privileges rendered to the recognized *culțe*. While state's financial assistance offered to these recognized *culțe*, in the form of the monthly wages of clergy, fiscal exemptions, monopoly over the manufacture of specific religious objects, etc., was granted, other new religious movements and groups, aiming at obtaining legal entity status, were more or less ignored.

The Law on Religious Freedom and the General Regime of Religious Denominations no. 498/28 December 2006

The "unfinished odyssey"³ of the new Law on Religious Freedom had begun early in the 1990s, but the dissensions between the ROC, minority denominations and civil society representatives made the reach of a consensus almost impossible, so that "early drafts were successively proposed and abandoned."⁴

The first draft law was elaborated in 1991 and submitted to the Parliament in 1993, without being adopted, due to pressures exerted by both the religious denominations and national and international civil society organizations. In 1998, the State Secretary for Religious Affairs (SSRA), headed by Orthodox theology professor Gheorghe Anghelescu, circulated two draft laws simultaneously, creating a lot of confusion and tensions.⁵ Both of these drafts were severely criticized by civil society and religious organizations, and consequently, the SSRA elaborated on a third draft, from which "the most harmful provisions had been excised" and presented it in a conference organized the end of that year. Several months later, however, in September 1999, the SSRA submitted to the government another draft, which "not only reinstated some of the most criticized articles, but did so in aggravated form" and Radu Vasile, then prime-minister, submitted it to the parliament in its unamended form (although the legislative initiative is ascertained, according to the Constitution, to the government, not to the prime minister).⁶

Adding to the unprincipled way of handling the situation, one of the main discontents with respect to this draft law (PL 341/1999) was its designation of the ROC as the "National Church," which fed the fears of the minority denominations that it "would reinforce the myth that there was a mystical unity between the Orthodox Church and the soul of the Romanian people and that only Orthodox believers could therefore be trusted as loyal Romanian citizens."⁷ In Isif Ton's words: "the national church addition was a dangerous threat to the minority religious communities who would then be treated as 'foreign intruders' in the life of the nation".⁸ Such fear was not without reason, to be sure, since many Orthodox theologians and even Dumitru Staniloae (the most important Romanian Orthodox theologian of the 20th century) argued that to be Romanian means to be Orthodox, and vice versa, and that any break of this bond is a result of either the individual's instability or of the aggression of a sect.⁹

PL 341/1999 contained some other problematic provisions. Article 15 for instance, stated that in order for a religious group to be allowed to open new places of worship, it had to represent 5% of the local population registered with

the local administration. Accordingly, only the ROC, which represented over 85% of the population (and in some geographical areas the Hungarian Reformed Church), could have benefited from the freedom of association, and none of the already recognized *culte* could have possibly open new places of worship. Also, in order to obtain legal entity status, a religious group had to present a nominal list with the identification dates and signatures of all the adherents of the respective religious group, and their number had to represent at least 5% of the total population of the country according to the last census. Had the draft law been adopted by the Parliament, the freedom of belief and the freedom of association would have been gravely violated.¹⁰ Fortunately, the grave deficiencies of this project law were eventually acknowledged, and the search for a better law continued.

In 2005, once again, two draft laws were circulating simultaneously. The one worked out by the former Minister of Culture Razvan Teodorescu, was submitted directly to the Parliament, taking "by surprise the drafters of the second bill, namely the SSRA and its head, Adrian Lemeni."¹¹ Eventually, Teodorescu's draft was abandoned both because it had not consulted the recognized *culte* and civil society before its submission to the parliament and because of its partisan and restrictive provisions (it designated the ROC "the national church" and required that changes in *culte's* bylaws be approved by the government). After consultations with civil society and recognized *culte*, the second draft was submitted to the Parliament (the Greek Catholic Church did not support the draft law, and other *culte* proposed some amendments and conditioned their support for the bill on the acceptance of these amendments).¹²

We will not insist on the sinuous trajectory of this project in the two Chambers of Parliament due to space considerations. What is important to mention is that the draft law was rushed to the Senate under "emergency procedures", and the Senate adopted it "tacitly", that is without debating it, thus ignoring more than 60 "substantive amendments." Then, the draft law was registered with the Chamber of Deputies also by breaking parliamentary procedures (the committees' report on the text of the draft law reached deputies only a few hours before the final vote, although the period between the distribution of the committees' report and the final vote had to be at least five days.)¹³ Despite the domestic and international critiques, the president promulgated it on 27 December 2006, just in time for the country's accession to the European Union on 1 January 2007.¹⁴

It must be noted that due to both national and international pressures, some of the most problematic clauses of previous drafts were abandoned - among them the designation of the ROC as the "national church." Still, ignoring the, at minimum, equally important role of the Greek Catholic Church in Romania's history (the Constitutions of 1923 and 1938 granted the GCC the status of "national church"), the drafters made special reference to the ROC: "The Romanian State acknowledges the important role of the Romanian Orthodox Church and of other recognized churches and *culte* in the national history of Romania and in the life of the Romanian society." (Art. 7. 2)

With respect to the registration conditions, the new law provided that, in order to be legally recognized as *culte*, religious associations must prove that they have functioned for at least 12 years in Romania and their membership amounts to at least 0.1 % of the population.

On the other hand, Law 489/2006 guarantees the freedom of thought, conscience and religion, states that no one shall be prevented from adopting a religious opinion or joining a religious faith, that no one shall be coerced into adopting a religious opinion or joining a religious faith, contrary to his/her persuasion, and no one shall be subject to any discrimination on account of their faith (Art.1). According to Art. 2, freedom of religion includes the right of every individual to embrace a religion, to manifest it individually or collectively, in public or in private, through practices and rituals specific to that denomination, including through religious education, as well as the freedom to preserve or change one's religion (the law does not mention, however, the right to have no religion at all). There are no limitations to these rights "other than those required under the law and which are necessary in a democratic society for the protection of the public, of public order, health or morality, or for the protection of fundamental human rights and liberties" (Art.2.2).

The law does not explicitly mention the principle of the separation between church and state (although some deputies proposed such an explicit formula) on the grounds that the state neutrality in relation to any religion or ideology was already stated in Art.9 of the law.

Instead, the law established a model of cooperation or partnership between the state and the church. According to Article 8 (2), the recognized *culte* are public utility legal entities, and as such, they are entitled to financial support from the state, proportionally with their membership. (This provision opened the way to another controversial project law on the Partnership between the State and Church in the social care sector, which has been voted by the Chamber of Deputies on March 8, 2011, amidst protests and petitions initiated by various civil society organizations. According to the project law, the religious denominations, which have social care activities, would be allotted state subventions of 80 percent of the total cost of the accepted projects. Adding to the funds allotted from the state budget for these projects developed by the church, local authorities would also contribute with buildings, land and other facilities for the development of these projects. On April, however, president Basescu sent the law into Parliament for re-examination on the ground that it introduces a discriminatory treatment of non-religious social services providers with respect to public funding. At the moment of writing this paper the law is still waiting to be re-examined in Parliament).

According to Law 489/2006, state's support for religious actors is granted both in terms of salaries for the clergy and non-clergy staff of the Church and in terms of state funds for building and repairing churches. In this respect, the law differentiates between religious groups (which do not receive any support from the state nor tax exemptions), religious

associations (which are exempted from taxes only for their places of worship but do not receive government funding) and recognized *culte* which are eligible for state support and enjoy tax-exempt status and other facilities). With respect to the latter, the state grants the recognized *culte* financial support on the basis of some subjective criteria: on demand, proportional to the amount of their membership and according to their real needs - i.e. the support is granted not for specific projects but according to the size of each denomination. The ambiguous formula thus leaves room for discriminatory financing.

Andreescu¹⁵ was probably right in his assumption that at least partially, the reason for granting *culte* a public utility status was to allow them (especially the ROC) to receive legally in concession public land, free of charge - before the adoption of this law, the practice, though very common, was actually illegal under the Local Public Administration Laws of 1991 and 2001 and the Public Property Law, which restricted such land grants to bodies engaged in charitable activities or to public utility associations. Under the new law, the state could grant the ROC 110,000 square meters of public land in Bucharest (valued at approximately 300 million Euros) on which the National Redemption Orthodox Cathedral (Catedrala Mantuirii Neamului) will be built, and the Deputies Chamber could decide to provide governmental assistance for the building of the cathedral by covering 50 percent of the total expenses - of approximately 400 million Euros.¹⁶

These facts are difficult to reconcile with the provisions stated in Article 10.5 of the law: "No one can be coerced, through administrative measures or other methods, to contribute to the funds of a religious denomination." Since public funds used by the state for financial support of the *culte* are not received from taxes collected for this purpose, one can wonder if those who do not want to contribute financially to the *culte's* building construction are not indeed coerced to indirectly do so under this very law.¹⁷

One of the thorniest issues during the last two decades was the religious education one. Law 489/2006 stipulates the right of parents or guardians to "opt for their underage wards' religious education, based on their own beliefs" (Art.3.1) and acknowledges only the right of the recognized *culte* to organize confessional education in every state school, and the state bound itself to provide financial support for this type of education (Art.32-39). Romania opted for what Glanzer¹⁸ calls "a managed pluralist type" of religious education - i.e. the state does not promote a particular religion according to the establishment model but allows some particular confessions (the recognized *culte*) to offer religious education in public schools. According to the law, religious teachers in public schools are appointed by the denominations they belong to, then verified by the Ministry of Culture and Religious Affairs and then approved by the Ministry of Education, Research and Youth. The same managed pluralist model applies to the confessional education in state universities; the right to operate confessional religious institutions of higher education is limited to the recognized *culte*, which can organize Bible colleges or seminaries.¹⁹ However, as some authors observe, this kind of pluralism is unevenly enforced, and like in many other areas, the Orthodox Church is granted special privileges; for instance, Orthodox private schools receives substantial public funding unavailable for other denominations.²⁰

The curriculum and content of some of the orthodox textbooks were denounced not only by some of the religious minorities (the Baha'i Community denounced the orthodox textbook for grade 10, Religion - The Orthodox Cult, published in 2006 by the Corint Publishing House, because it depicted that community as an "insistent proselytizer", as one of the "tools of Satan, or gates to hell", as a danger for society, a "sectarian group in the West" that make use of "indoctrination, bribe, blackmail, exploitation of poverty, fanaticism" and Jehova's Witnesses criticized the textbook for grade XI because it depicts them as a sect, although it was recognized as a cult²¹) but also by some parts of civil society, because they "include elements that are potentially problematic from the viewpoint of the twin tolerations democratic requirement and the state's need to be impartial with respect to denominations...".²² Thus, for instance, Stan and Turcescu reprobate the fact that the role of other religious groups, most notably the Greek Catholic Church in the emancipation of Transylvanian Romanians and the formation of the Romanian Kingdom in 1918, is not acknowledged in Orthodox manuals, which "blend Orthodoxy and nationalism, and [...] alternate lessons about Jesus with lessons about the lives of Romanian saints and political rulers", present the Orthodox Church "as the most important religion of the Romanians, key to their ethnic identity, nation and state" and define "the Romanian law" as "belief in God and love of the country" (the grade 9 lesson on 'Love of Nation and Country').²³

A confrontation between two models?

Looking at it as a whole, the new law was certainly a step forward in regulating religious life in post-communist Romania. However, many sensitive areas still remain that have the potential of bringing about discriminatory situations. Against such instances a series of national and international organizations reacted promptly.

The Institute for Religion and Public Politics' evaluation was probably the toughest - it considered it the "worst religious law in Europe." The Institute's report stated that: "the promulgation of this law by President Basescu is a blatant attack on religious freedom and fundamental rights and demonstrates little if any move away from the previous Communist regimes.."

The Annual International Freedom Reports of the U.S. Department of State have also repeatedly emphasized faults of the law and the discriminatory treatment of religious minorities in Romania and the Helsinki Commission

criticized the law before its adoption, especially on the grounds that it created "the most burdensome registration system in the entire OSCE region."

However, the critiques of these institutions were largely disavowed basically on the grounds that they were representing an exclusive American understanding of religious freedom. Radu Preda, one of the main figures among the drafters of the law, described the tensions during the process of elaborating and adopting the new law in terms of a confrontation between two models: the American and the European one, with respect to the relationship between the State and the Church. While the American model makes no qualitative distinction between the religious denominations, the European model to which Radu Preda makes reference was, in his own words, neither England's one, which integrates the religious into the political sphere, nor the French one of complete separation of the two spheres, but the German inspired one, called "die hinkende Trennung" ("a halting separation"), which requires the interpretation of religious freedom in terms of churches' responsibilities for the civil community. The conditions to be met by the churches in order to become part of the public sphere ("Koerperschaft des oeffentlichen Rechts"), according to this model are persistence and numerical consistence. As such, they are entitled to receive state support for their social projects, tax exemptions and free access in public places (schools, garrisons, penitentiaries).²⁴ As the American model, with its separation of the State and Church would mean a "social amputation of a definitive dimension of the human being," in Cazaban's words, it could not be applied to Romania.

Pr. Constantin Stoica, the spokesman of the Romanian Patriarchate, asserted that the law was "deeply democratic and European" and "respects all the provisions of the international treaties with respect to the freedom of conscience and religion." And, as president Basescu said, "we are entering the EU with our own specificities, traditions and cultural identity that have to be defended at bottom against the anti-European streams." However, the most important argument was probably the following: in Pr. Stoica's view, "the provisions of the Law were discussed and approved by the experts of all *culte*, which represent 99.9% of the nation. Then, the Law was analyzed by the chambers of the highest democratic forum of the country, the Parliament. Finally, the president promulgated the law. *Therefore, it is the expression of the Romanian democracy. Who could challenge democracy?*" Adrian Lemeni, the state secretary for *culte* also warned against that part of civil society that run counter to the majority of 99%.

If that was true, then it is very difficult to make sense, for instance, of "march of the *culte*" against the law, on 21 January 2007, immediately after its adoption. The advertizers of the law have probably forgotten the fact that parliamentary procedures were broken in the process of adopting the law and that the Greek-Catholic Church did not support the law because of the restitution issue and that most minority *culte*'s support for the draft law was conditioned upon the acceptance of their amendments - that were largely ignored. In their official communiqué, these minority *culte* spoke against the law, which "offers little guarantees for the religious freedom and is inconsistent with respect to the affirmed principles and the real protection that it offers" and criticized the barriers that the law allows to stand in the way of the *culte*'s autonomy. However, they were marginalized by the media and by supporters of the law concerned with defending the myth of the "unanimous" support for the law.²⁵

Conclusion

The analysis of the state of religious freedom, two decades after the fall of the communism in Romania reveals ambivalent developments. There were some undeniable signs of progress: the opening of the borders allowed religious denominations to develop international links with similar religious groups and cooperate in the field of social assistance, mission, religious education, humanitarian aid, etc.; religious meetings and conferences were allowed in general (although sporadic incidents were reported); progresses have also been made in recognizing the history of the Holocaust in Romania.

However, the prolonged legal uncertainty made room for abuses, especially against religious groups that were not recognized as *culte*, but also against other religious minorities that enjoyed such recognition (the problem of restitution of religious properties to their legitimate owners). Despite the prolonged quasi-anarchy that reigned in the religious sphere, however, as Andreescu noted: "If one takes a realistic look at the political context of the 1990s and the degree of influence then exercised by the ROC, the late-coming of the 2006 law may in fact have been a blessing in disguise," because although "the 2006 law is hardly an ideal, it looks much better than all the various bills that preceded it."²⁶

Indeed, the new law represents an important step forward, but significant areas of improvement still remain. The most problematic aspects of the law are, in our opinion, the two-tier system and the financial dependence of the *culte* on the state.

On the one hand, by making a distinction between the privileged recognized *culte* and other religious groups and associations, by deciding which religious actor fits into each one of these categories and by offering its financial support and fiscal exemptions on this basis, the state indirectly pretends to represent the supreme instance in religious affairs. The restrictive and discriminatory conditions - such as, for instance, the requirement of 300 registered Romanian citizens for the creation of a religious association, while the creation of any other kind of association requires only 3 members - were thus meant to preserve the status-quo in the religious sphere, by protecting the already recognized *culte* from other competitors.

With respect to the issue of financial support from the state, we consider that there is an inherent risk in religious groups' dependence upon state resources; by establishing strong connections with the state, in order to consolidate their privileges and rights, and by being assimilated as institutions of the state (despite this being called "distinct cooperation" or "partnership"), churches may lose the freedom and independence they need in order to become part of a strong civil society that is able to sustain a strong democracy.

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¹ Lavinia Stan and Lucian Turcescu, *Religion and Politics in Post-communist Romania* (Oxford: Oxford University Press, 2007), 25.

² Such as the Decree 9/31 December 1989, by which the former suppressed Greek Catholic Church was officially recognized and the annulment, in 1991, of the communist regime's Decision 810/1949, by which the activity of Catholic orders and congregations in Romania had been forbidden; the Decree 126/24 April 1990, by which the Romanian state bound itself to retrocede the Greek Catholic Church the properties that had been confiscated by the communist regime on the basis of Decree 358/1948 and turned over to the Romanian Orthodox Church. With respect to the last issue, one can notice retrospectively that successive governments have continuously postponed and delayed the restitution of properties to their legitimate owners, and by Law 182/2005, the state eventually transferred its responsibility to unravel the issue to the tribunals (the retrocession of the Greek-Catholic properties, as well as those of other religious communities, remains one of the thorniest religious issues of the post-communist era.).

³ Silviu Rogobete, "The Unfinished Odyssey of a New "Law for the General Regime of Religion" in a South-Eastern European Country: the Romanian Case" in *Legal Position of Churches and Religious Communities in South-Eastern Europe. Collection of articles, selected relevant legal texts and other sources*, ed. S. Devetak, L. Kalcina, and M. Polzer, (ISCOMET, Ljubljana, Maribor, Vienna, 2004): 129-142.

⁴ Liviu Andreescu, "Romania's new law on religious freedom and religious denominations", *Religion, State and Society*, 36. 2 (2008): 145.

⁵ L. Andreescu, "Romania's new law...", 145.

⁶ L. Andreescu, "Romania's new law...", 145.

⁷ Earl A. Pope, "Ecumenism, Religious Freedom, and the 'National Church' Controversy in Romania," *Journal of Ecumenical Studies*, 36 1.2, (Winter/Spring 1999): 194.

⁸ Iosif Ton *apud* Earl A. Pope, "Ecumenism, Religious Freedom...", 195-6.

⁹ Dumitru Staniloae, *Reflectii despre spiritualitatea poporului roman* (Craiova: Scrisul Romanesc, 1992).

¹⁰ Silviu Rogobete, "The Unfinished Odyssey..."

¹¹ L. Andreescu, "Romania's new law...", 145.

¹² L. Andreescu, "Romania's new law...", 146.

¹³ Institute on Religion and Public Policy Report on Romania, 2008, available online at: http://lib.ohchr.org/HRBodies/UPR/Documents/Session2/RO/IRRP_ROM_UPR_S2_2008_InstituteonReligionandPublicPolicy_uprsubmission.pdf (December 2010).

¹⁴ Available at <http://www.cdep.ro>.

¹⁵ Liviu Andreescu, "The construction of Orthodox churches in post-communist Romania", *Europe-Asia Studies*, 59.3 (2007): 476-7; Liviu Andreescu, "Romania's new law ...", 150.

¹⁶ Liviu Andreescu, "The construction of Orthodox churches..."; Liviu Andreescu, "Romania's new law..."; Stan and Turcescu, *Religion and Politics...*; C. Dobreanu, "Catedrala bugetului neamului", *Romania libera* (13 December 2007) <http://www.romanalibera.ro/actualitate/eveniment/catedrala-bugetului-neamului-113550.html>.

¹⁷ Liviu Andreescu, "Romania's new law...", 148.

¹⁸ Perry L. Glanzer, "Religion, Education, and the State in Post-Communist Europe: Making Sense of the Diversity of New Church-State Practices," *Comparative Education Review* 53.1 (2009): 89-111.

¹⁹ Perry L. Glanzer, "Religion ...", 102-3.

²⁰ Romanita E. Iordache, "Church and State in Romania," in Ferrari & Durham, *Law and Religion ...* , 257.

²¹ APADOR-CH report: Stat si religii în România - o relatie transparenta?

²² Stan and Turcescu, *Religion and Politics...*, 165.

²³ Stan and Turcescu, *Religion and Politics...*, 165-7.

²⁴ Radu Preda, "O alta relatie stat-culte". *Rost* 50 (April 2007). <http://www.rostonline.org/rost/apr2007/culte.shtml>.

²⁵ Liviu Andreescu, "Romania's new law on religious freedom...", 155.

²⁶ Liviu Andreescu, "Romania's new law on religious freedom...", 141.