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Galeotti on multicultural recognition: the case of the Danish cartoons and Quran burnings

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Toleration as recognition as a theory of multiculturalism

Anne Elisabetta Galeotti has articulated and developed a theory about toleration as recognition that partly aims at addressing some of the central issues and controversies facing multicultural societies. Although not all multicultural issues are issues of toleration and although the theory of toleration has a broader scope than multiculturalism, many of the contemporary issues of toleration addressed by Galeotti's theory are issues linked to multiculturalism, such as the wearing of Islamic headscarves by Muslim girls in schools (Galeotti 2002), Mosque building (2015a), autonomy-based criticisms of minority cultural practices (Galeotti 2015b), or the intertwining of gender oppression and immigrant oppression (Galeotti and Sala 2023). One might accordingly think of Galeotti's theory of toleration as recognition as partly a theory of multiculturalism.

Considered as a theory of multiculturalism, Galeotti's theory is distinctive in several respects. One way of highlighting the distinctiveness is to focus on how Galeotti tries to avoid or to reconcile some of the standard dichotomies or oppositions in political philosophy concerned with issues like multiculturalism. This is reflected in the label she has given her theory, namely "toleration as recognition". Many discussions of multiculturalism have proceeded on the basis that either one is in favor of multiculturalism, or one is against it. If one is against multiculturalism, this might be because one is instead for some form of liberal neutrality, in which case multiculturalism is understood as by definition at odds with liberalism (e.g., Barry 2001).

One way of looking at Galeotti's theory of multiculturalism is that she seeks to reconcile liberalism and multiculturalism rather than sees these positions as by definition in opposition. This might not seem a novel project, given that liberal multiculturalism has been a staple of political philosophy since at least the nineties (Kymlicka 1989, 1995). However, where classic liberal multiculturalism sought to justify groups rights and exemptions for cultural minorities on liberal grounds, Galeotti's attempt at reconciliation both goes deeper in theoretical terms and has a broader or different scope.

As far as the theoretical depth of the theory goes, the label "toleration as recognition" signifies an attempt at qualifying the classic understanding in much debate about multiculturalism where "toleration" has been a place holder for the kind of relation to diversity countenanced by traditional liberalism. Toleration is here understood as a relation where differences are negatively valued, where one party has the power to interfere based on their dislike or disapproval, but where they refrain from doing so. Recognition is, on the other hand, traditionally understood as an alternative to toleration, i.e., as a relation where differences are positively valued and where the act of recognition consists in some active act of accommodation (for more on this traditional way of describing toleration and multiculturalism, see Lægaard 2021).

Galeotti's fundamental argument (in Galeotti 2002, see Lægaard 2008 for analysis and discussion) is that liberal neutrality has traditionally been understood as concerned only with individuals and the differences between them in terms of conceptions of the good, regarding which the state should then be neutral.

Galeotti's claim is that conceptions of the good are not the only relevant differences between people that should matter to liberalism. An important difference concerns the difference between minorities and majorities understood in terms of certain kinds of power relations. Galeotti understands majorities as those groups who hold the power to set social standards and thus to define what counts as normal in a society. Minorities are those groups that lack this power and are seen as different by the majority. Minorities are often disliked or disapproved of by the majority precisely because they do not conform to the social standards set by the majority. Relations between majorities and minorities are accordingly potential relations

of toleration, but the features that account for this are not captured in the traditional liberal focus on individuals and their conceptions of the good, and liberal neutrality as traditionally understood might even mean that the power relations in question are ignored or made invisible.

Galeotti couples this analysis of social difference with a view of the value component of liberalism as a concern with inclusion into full citizenship, understood as requiring not only equal rights and formal non-discrimination but also equal capabilities for making use of these rights, and hence to function as a citizen, understood as both a political and a social agent. The analysis of social difference together with the normative principle of inclusion into full citizenship means that liberalism, according to Galeotti, requires the state to actively address unequal power relations that exclude minorities from full citizenship. The state should do this by publicly recognizing the differences in question, not in the sense known from traditional multicultural recognition theory according to which recognition involves a positive valuation of cultures, but in the sense of acknowledgment of the noted types of power relations and the resulting minority status and public legitimation of the presence of minority groups (for a recent statement of her view of recognition, see Galeotti 2023).

In terms of scope, Galeotti's theory is thus not only concerned with formal rights and legal rules and not just with culturally defined groups. Social standards, how people relate to each other in light of them, and the resulting ascriptive identities, are also central to her theory. Galeotti has subsequently further refined her theory. One of the refinements concerns a focus on the social virtue of civility, understood as the disposition to follow social standards out of regard for others' expectations, which might both be instrumentally valuable, communicate respect, and have a dark side when standards of civility are not revised but upheld despite developments in society and therefore become reasons for social exclusion (Galeotti 2017).

Given that Galeotti's theory has this broader focus on social standards and state recognition of minority status, several questions arise. One question is what the relation is between what one might call the standard liberal package focused on equal rights and formal non-discrimination and Galeotti's additional focus on

social standards and informal power relations. When are multicultural issues appropriately addressed as a matter of liberal rights and when are they rather issues of social toleration? Furthermore, how do these two perspectives on multicultural issues relate to each other? Might there be cases where the liberal rights perspective requires permission of – and perhaps even protection of – the right to engage in practices that should be seen as problematic in the social toleration perspective? Is there a liberal right to be socially intolerant in a way that the liberal state should be concerned about and, if so, what is the liberal state to do in such cases? If the state should be concerned with exclusionary social standards and socially intolerant acts based on them, does this require formal changes of legislation or rather revision of informal social standards and how can either of these responses secure the required inclusion? Finally, given that many multiculturalism issues concern differences due to immigration and globalization, how should we understand majorities and minorities if the differences in question are transnational? If the liberal state should be concerned with social power relations but these are not limited in scope to the nation-state but rather involve groups and differences cutting across borders and involving agents from outside the jurisdiction of the state, what does this mean for how the liberal state should address such multicultural issues?

Multicultural controversies of free speech and religion

To discuss these questions, I will focus on a specific type of case that seems to instantiate all the issues just noted. The type of case concerns controversies over public utterances that target beliefs central to identities of immigrant minority groups in ways that they object to but where the utterances are sought justified as being in accordance with established social standards in the society in question for how to engage with the relevant kind of differences. The minorities in these cases are furthermore connected transnationally in ways that mean that the issue is not a purely domestic matter.

This (slightly cumbersome) characterization of the type of case applies to several prominent multicultural controversies, including the controversy over Salman Rushdie's novel *The Satanic Verses* and the Danish cartoons published in 2005 under the heading "The Face of Mohammed" (Horton 1993; Lægaard 2007). Both cases involved utterances engaging with Muslim beliefs in ways that many Muslims found deeply

offensive and which some critics thought problematic in a multicultural society, whereas defenders of Rushdie and the Danish cartoons appealed to the importance of free speech and critique of religion, as well as literary and satirical traditions. Both cases furthermore centrally involved agents from other states exercising various forms of pressure in ways that made the controversies matters of order and security.

Not only do cases of this type instantiate the already mentioned features and related questions that are pertinent in light of Galeotti's theory, Galeotti has also explicitly addressed the case of the Danish cartoons (2010: 448; 2021). While the controversies over the *Satanic Verses* and the Danish cartoons might seem dated, this is furthermore not the case. After living under the *fatwa* issued in 1989 by Ayatollah Khomeini for over thirty years, Salman Rushdie was attacked on 12 August 2022 while holding a lecture at the Chautauqua Institution in New York. He lost sight in one eye and the use of one hand but survived the murder attempt. The Danish cartoons were reprinted several times in the years following the original publication, leading to recurrent terrorist threats against Denmark and actual attacks on the cartoonist responsible for the most prominent of the cartoons. One of the most prominent reprintings of the cartoons was in the French satirical magazine *Charlie Hebdo*, which subsequently produced its own cartoons of Mohammed. This led to a firebombing in 2011 and an attack in 2015 killing 12 people and wounding 11 others (for discussion, see Attia 2016). These controversies have evidently not dissipated.

At the political level, there has also been developments. At the time of the publication of the original Danish cartoons, Denmark had a so-called blasphemy clause making it a criminal offense to publicly mock or degrade the religious beliefs or worship of any legal religious community, as well as a so-called racism clause criminalizing public utterances threatening, insulting or degrading to a group of persons due to their race, skin color, national or ethnic origin, faith or sexual orientation (Lægaard 2007: 485-486). The public prosecutor did not, however, bring charges against the publication of the cartoons. The controversy and the resulting crisis for Denmark nevertheless lead to a political discussion which resulted in the eventual abandonment of the blasphemy clause in 2017. The reason for this was partly the wish to protect critique of

religion and human rights that could be limited by a blasphemy ban, as well as providing better opportunity for criticism of the use of blasphemy bans to suppress human rights in other countries.

The repeal of the Danish blasphemy clause meant that it became legal to publicly burn or desecrate religious books. This was picked up by right wing activists in Denmark who started to conduct public burnings of the Quran as a way both of protesting what they saw as “the Islamization of Denmark” and to provoke reactions from Muslims that could support their message that Muslims did not belong in the country. This fringe phenomenon suddenly moved center stage during the NATO accession process for Sweden after the Russian war on Ukraine, where Swedish membership depended on the approval of Turkey. Right wing anti-Islamicists as well as refugees from Islamic countries started burning Qurans outside the embassies of Islamic countries in Sweden, and subsequently in Denmark and Norway. In the summer of 2023, the Danish government reacted to the combination of security threats and diplomatic tensions to which this gave rise by announcing that it would consider new regulations of free speech to limit such provocations.

A central player in these events was the Organization for Islamic Cooperation (OIC), which had been central both to the criticism of the *Satanic Verses* and the Danish cartoons. The OIC had since the late nineties campaigned in the United Nations human rights system for a general ban on defamation of religion as a form of racism (Skorini 2020). In the summer of 2023, the OIC demanded that the Swedish and Danish governments struck down on the Quran burnings and ensured that such acts would not happen again. The free speech issues raised by these controversies are accordingly very much alive and linked to international politics.

Galeotti’s take on the cartoon controversy

Galeotti addresses cases like these as instantiating a separate type of multicultural claim, which involves a conflict with other rights. This type of multicultural claim is not simply concerned with the revision of unexamined social standards, which challenges established majority privileges without clashing with any rights. The multicultural claims in question often involve the right of freedom of expression or other rights to

personal liberty. Galeotti initially indicated that her approach would address such clashes between multicultural claims and individual rights by distinguishing between the actual claim, which is a proper matter for negotiation and accommodation, and the right attitude of consideration and regard, which is due to the claimants:

In the case of the Danish cartoons, for example, a claim contrasting the freedom of expression was advanced by Muslim groups so as to prevent the publication of allegedly blasphemous representation of Muhammad. The government could not forbid the cartoons' publication, because political censorship of the free press crucially jarred with liberal constitutional principles. Nevertheless, the refusal of the Danish government to receive the imams and discuss the problem with them was also a clear sign of institutional disrespect which fuelled the controversy. If democratic institutions have to stick to certain principles, like freedom of expression, there are nevertheless various modes and attitudes of carrying out such an uncompromising stand. (Galeotti 2010: 448)

This description of the Danish cartoons case acknowledges the conflict between a standard liberal right (in this case to free speech) and a multicultural claim advanced by a minority (in this case Muslims). Galeotti further assumes that the liberal right could not be limited to satisfy the claim, so in this case there is no negotiation or accommodation of the claim as far as this implies legal limits to free speech. In this brief engagement with the case, Galeotti then focuses on a specific aspect of the controversy, namely the refusal of the Danish prime minister to meet with Muslim representatives to discuss their complaint (for further discussion of this particular aspect, see Brown and Lægaard 2021). The point of this focus is that it shows one possible implication of the dual focus of Galeotti's theory, namely that even though the legal right to free speech could not be limited by a ban on perceived blasphemous cartoons, the state could and should still show respect for the minority group making this claim and should take active steps to signal inclusion of it in other ways, e.g. by meeting with their representatives.

Galeotti (2021) has furthermore discussed the aspect of the case of the Danish cartoons (and related cases like the attack on *Charlie Hebdo*) that involved reciprocal accusations of intolerance. Galeotti argues that her theory not only shows that toleration is an applicable category but also can disentangle the confusion about who was intolerant and of what. She notes that, whereas most multicultural controversies concern majority demands for limits to minority practices, such as religious dress for Muslim women and mosque building, the case of the cartoons seems reversed, since here it is Muslims who demand limits to free speech. Rather than majority intolerance of a minority, the case is accordingly often seen as one of Muslim intolerance (2021: 96). Against this reading of the case, others see the Danish cartoons as expressing an intolerant view that signals exclusion of Muslims.

Galeotti uses this case and the incompatible readings of it to illustrate how her theory of toleration as recognition provides a more nuanced perspective. She first considers the question about the vertical conception of toleration embodied in the liberal model, according to which the state should ensure equal liberty to every citizen and member of society by means of constitutional rights, including free speech for all. Since toleration as recognition is concerned with equal respect and inclusion into full citizenship, the claim that the cartoons undermine the equal standing of Muslims, by demeaning and ridiculing their religion and culture, cannot be dismissed beforehand. Nevertheless, Galeotti provides a variety of reasons why free speech should not be limited:

Firstly, the harm done by misrecognition is diffuse and cannot be established in a precise way, as in case of libel. Secondly, the harm of misrecognition should be balanced with the harm of censorship. Thirdly, a legal ban on the vignettes might have induced a backlash on all Muslims, instead of contributing to their inclusion. All in all, the option of banning the publication for the sake of the overall toleration of Muslim religion and culture meets serious obstacles in its way, so as to make the legal ban ill-advised. (2021: 97-98)

These reasons against a limit on free speech seem to be of a more pragmatic and less principled kind. It seems that the balancing of competing considerations could in principle have come out differently, if conditions had been slightly different, so that limits on free speech would be justifiable after all. Given that the theory is concerned with securing equal respect and the claim under consideration is that the publications in question are disrespectful and demean and exclude a minority, one might have expected the reasons required for nevertheless upholding the right to make such publications to be of a more principled kind.

While Galeotti proceeds on the assumption that the legal right to free speech cannot be limited to accommodate Muslim claims for a ban on the cartoons, she once again points out how her theory provides a way of supplementing this traditional liberal response:

Yet, the decision against the ban does not imply that the harm of misrecognition cannot be addressed in a different way. If the point of toleration as recognition is the legitimization of the public presence of a cultural and religious difference, then, even though censorship is excluded, different political actions affirming the symbolic meaning of equal respect for the Muslim population are usually available. (2021: 98)

Galeotti once again mentions the refusal of the Danish prime minister to meet with Muslim representatives and suggests that such a meeting would not have compromised freedom of expression but, rather, given Muslims due consideration and would have been a way to take them seriously. So Galeotti's view is that the state should not limit free speech, but it should seek to acknowledge and recognize the complaints raised by Muslims in other ways.

Shifting from the vertical issue of how the state should respond, Galeotti then considers how we should think of the publication of the cartoons as such. The question is then not whether this act should be legal or not, but how we should categorize it from the point of view of toleration as recognition, given that it is legal.

This is then a matter of social toleration in intergroup relationships. The question is who we should think of as being the intolerant party in such a horizontal perspective. Since toleration presupposes the power to act on a negative attitude to others, this requires consideration of what power means in such social relations where the parties do not have the power to prohibit what they disapprove of, since it is protected by legal rights enforced by the state.

Social agents may have rather the power to put a burden on others' liberty, to make it more costly, and to stigmatize certain kinds of behavior or practices with social sanctions. For social toleration to make sense at all, the notion of interference should be interpreted in such a way as to include social sanctions and extra burdens on the conduct or practice that is the target of the objection. (Galeotti 2021: 99)

In this horizontal perspective, there is again two opposed readings of the case. From the point of view of defenders of the publication of the cartoons, it was not only within the scope of the tolerable, but a morally justified reaction to the intolerable violence and the bigotry performed in the name of Islam, as for instance expressed in the threats to Rushie. On this reading, the publication was an instance of (justified) social non-toleration of the intolerable (Galeotti 2021: 100).

Galeotti is critical of this reading of the horizontal case. Given that the issue is not about legal limits to free speech, she sees the issue as one of self-restraint in social relationships. She suggests that the Muslim claim to have specific religious convictions (e.g., regarding the prophet) exempt from the scrutiny of satire, to which the cartoons responded, can only be seen as intolerable if it either violates the harm principle or puts the liberal political order at risk. But:

Even granted that such principles allow contested interpretations, still it is hard to see how the claim to immunity from rational scrutiny harms third party or puts the political order at risk.

Such a claim may be the object of strong disapproval, but that qualifies it precisely as an object of toleration/intolerance. (Galeotti 2021: 100)

Galeotti concludes that “the moral recommendation to publish could easily be trumped by the reasons in favor of tolerant self-restraint.” (2021: 100) She even suggests that, rather than seeing the publication of the cartoons as a response to intolerance, it could itself be seen as an act of social intolerance. Since the publishers objected to aspects of Islam and had the social power to ridicule those aspects publicly, which is to issue a social sanction against them, the publication of the cartoons can be described as socially intolerant, and Muslims’ protests can then be classified as response to intolerance (2021: 101).

So while Galeotti comes down squarely on the side of free speech as far as legal limits are concerned, she both argues that toleration as recognition recommends simultaneous acts of recognition of the complaints against the publication by the state and that, even though the publication of the cartoons should be legal, it can be seen as socially intolerant and Muslim protests, as long as they are non-violent, as responses to intolerance.

Questions for Galeotti’s perspective on the controversy

While Galeotti’s discussion of the cartoon controversy adds the perspective of symbolic recognition to the standard liberal rights perspective, it also raises several questions. Since Galeotti distinguishes between vertical toleration by the state and horizontal toleration in intergroup relations, I will first discuss some questions that arise at the state level and then some at the social level.

No legal limits?

At the state level, the first question concerns Galeotti’s assumption that there could not be legal limits to free speech in the cartoon controversy. Even on mainstream liberal views about free speech, there can be limits to free speech, e.g., for reasons of national security, public safety, or for the protection of the reputation or

rights of others (cf. the European Convention of Human Rights, article 10(2)), which outside the US is assumed to be consistent with bans against hate-speech. One can distinguish between several different kinds of possible reasons for such limits. One is the protection of religion as such, as sought by the OIC. Most liberals reject this as a valid reason for limiting free speech. A distinct reason is the protection of minority groups, which may include religious minorities such as Muslims, e.g., against hate-speech. While Muslims as a religious minority is identified on religious grounds, the reason for bans on hate-speech against religious groups is to protect members of such groups rather than their religious beliefs. This raises the question when an utterance attacks a religious belief and should thus be permitted according to most liberal views, and when it functions as a way of demeaning and excluding members of the religious minority, in which case there could be a case for limiting it. A third type of reason are those based on security and order, which relate to the terrorist threats and attacks in the controversies. The dilemma here is whether to limit an otherwise permitted act of free speech because of the possible violent reactions of others. While this is in principle problematic, since it is the violent reactions that are wrong, the possibly grave consequences in the real non-ideal world are nevertheless hard to simply dismiss. Finally, the controversies under discussion also involve relations to other states, e.g., the 57 member states of the OIC, which raises the question whether domestic free speech can and should be limited out of concern for the relations to foreign countries, who might hold considerable political and economic power.

One way of seeing toleration as recognition is that it resembles Corey Brettschneider's theory of "value democracy", according to which the state should protect the legal right to express illiberal beliefs but should at the same time publicly criticize viewpoints advocating discrimination based on race, gender, or sexual orientation (Brettschneider 2012). When the state uses its expressive capacities to promote values of free and equal citizenship, it engages in what Brettschneider calls democratic persuasion. By using democratic persuasion while protecting rights to free speech, the state can both respect liberal rights and counter hateful or discriminatory viewpoints. Not only does Brettschneider's distinction between expressive and coercive kinds of state action resemble Galeotti's distinction between vertical toleration and symbolic recognition by the state, her view of liberalism as inclusion into full citizenship also seems to fit nicely into the kind of

democratic persuasion suggested by Brettschneider. So long as Galeotti maintains that free speech cannot be limited in a case like the cartoon controversy, it seems that Galeotti's and Brettschneider's views are very similar in their implications.

But does toleration as recognition only provide reasons for engaging in democratic persuasion or does it also provide reasons for legal limits? Galeotti has earlier argued that the discussion about legal limits to free speech should not only be framed in terms of the possible direct harm of forms of speech against the importance of free speech. She has argued that legal bans on racist hate-speech also have a symbolic meaning "as a public gesture against complacency and complicity in racist verbal attacks, as a signal and a public stand against racial hatred." (Galeotti 2002: 111) In this perspective, the point is that symbolic public gestures are not only a distinct and separate mode of state action in addition to enforcement of ordinary liberal rights, as democratic persuasion in Brettschneider's sense, but that the regulation of legal rights itself carries such symbolic meaning (2002: 156) and that the importance of signaling public toleration of minority groups can provide a reason for imposing legal limits on hate-speech against such groups.

Even if Galeotti maintains that the state could not impose legal limits in the case of the Danish cartoons, what about the more recent cases of Quran burnings? There seems to be several potentially relevant differences between the cartoons and the Quran burnings. Where the cartoons expressed substantial criticism of religion and did so within an established and valuable tradition of satire central to Danish democratic debate, with the stated aim of integrating Muslims in Danish democratic culture, this may not be the case for the Quran burnings, most of which are motivated by a wish to exclude Muslims.

These possible differences are reflected in the political reactions: Where the Danish government in the cartoon controversy resisted demands for limiting the freedom of the press, the Danish government in 2023 proposed a bill criminalizing improper treatment of objects of religious significance to provide the police with legal grounds for preventing Quran burnings. In December 2023, the bill was passed by the Danish parliament in a revised form limiting criminalization to improper treatment of holy books.

Galeotti has previously argued that liberal arguments for free speech are questionable in relation to racist demonstrations in public spaces, such as the notorious Nazi marches in Skokie, Illinois (2002: 158-59).

Galeotti noted that such demonstrations have little expressive value and carry the risk of inciting to crimes against minority groups. The recent Quran burnings might be thought to resemble racist demonstrations in that the burning of a holy book has little expressive value and could be a form of incitement against a religious minority. If so, is condemnation by the government of such acts sufficient according to toleration as recognition, or does the concern with inclusion into full citizenship in cases like this also mean that the acts should be criminalized?

The question for Galeotti's theory at the legal level is thus, first, if it is plausible to uphold the combination of no legal limits on utterances such as the cartoons while at the same time claiming that the state is under a duty of justice to secure full inclusion of Muslims that requires the recognition by the state of Muslims' complaints against the cartoons. Secondly, even if this combination is upheld in the case of the cartoons, can it be sustained in the case of the Quran burnings, which seem to resemble the kinds of cases where Galeotti has earlier accepted legal limits against racist hate-speech?

Not merely domestic cases

Another issue at the state level concerns what difference it makes for how the state should handle cases like the cartoons or the Quran burnings that they are not merely domestic cases involving a majority practice and a minority group but are matters of international politics involving other states.

Galeotti's theory of toleration as recognition focuses on the domestic relations of power and the resulting minority groups and makes it a duty of justice on the state to acknowledge and recognize this. But what happens when international relations of power are added to this picture? Does this change anything in the analysis of power relations that is the basis of the duties on the state? Social power in Galeotti's

understanding is about the definition and imposition of social standards and related social sanctions. The cartoon controversy originated in a domestic Danish context where traditions of satire and critique of religion were taken for granted and where the objections of Muslims to the cartoons were taken as a sign that Muslims had failed to integrate into Danish culture. In this context, Muslims were the minority in Galeotti's sense. However, once the cartoon controversy became an international matter, Danish norms of satire and criticism were no longer dominant and the social cost of following them was increasingly placed on Danes (the Danish state, Danish companies, and individual Danes) rather than on Danish Muslims. In the more recent case of Quran burnings, this development is even clearer since there has been little sympathy for these actions and the Danish government quickly took steps to impose legal limits.

Given that toleration as recognition is premised on an analysis of multiculturalism in terms of social power relations and the resulting minority status, do transnational power relations change how we should view the cartoon controversy from the point of view of toleration as recognition? One possibility is that what in a domestic perspective is a dominant social power relation with Muslims as the minority group disappears or is at least changed in a transnational perspective. Maybe there is no clear minority group in a transnational perspective, or maybe it is even the Danes who are now the minority? If so, what does this mean for the duties of the state? Should it now protect the right to criticize religion, when religion is now linked to global power rather than to a domestic minority position, given that utterances like the cartoons are now under significant global pressure?

Even if justice still requires the state to be concerned with public toleration of domestic minorities like Muslims, even if Muslims globally may not be in a minority position, the international dimension can still enter and complicate the picture in another way, namely as a distinct set of additional reasons. The state is not only concerned with securing justice but also with upholding order, keeping the peace, dealing with security threats, and maintaining its ability to act in international politics. How should such reasons of state be factored in relative to toleration as recognition?

In this perspective it is conspicuous that the Danish government justified the new ban on improper treatment of holy books purely in terms of security and relations to other states (the OIC), not in terms of concern for Muslims as a domestic minority group. The government could thus be interpreted as holding the view that there is no duty of justice to Danish Muslims requiring limitations on Quran burnings, but that reasons of security at the same time trump the protection of liberal rights to free speech.

Galeotti has in fact discussed the relation between toleration and security. She holds that the boundaries of toleration are set by the principle of self-defense of the political order and by the harm principle: actions and practices putting the political order at risk or harming third parties are excluded from the area of toleration (Galeotti and Liveriero 2021). But this kind of approach seems mostly tailored to internal threats to security such as intolerant groups in a given society. Galeotti's discussion of such cases is furthermore mainly focused on whether such intolerant groups can nevertheless have reasons to be tolerant. If the focus rather is on the state, it seems plausible that the state should not tolerate intolerant groups such as violent fundamentalists.

But if threats to security or order rather come from the outside, e.g. from transnational groups or from (groups of) other states, this seems to change the terms of the discussion. The state is then no longer the sovereign power in a position to permit or to interfere with actions of a domestic group. The state now rather stands in between citizens and groups of citizens in its own society and various pressures from the outside, and the state may not have the power to prevent these outside pressures from affecting its own citizens. In such cases, the state may then be faced with a dilemma. On the one hand it might be under a duty of justice to uphold liberal rights to free speech domestically. On the other hand, it might have prudential or strategic reasons to limit free speech, either because this seems the best way of avoiding even worse outcomes, such as potential terrorism, or because it is required for the state to uphold international relations important for other purposes.

This seems to raise a more general question about the relation between reasons of justice and security that is not specific to toleration as recognition (Wendt 2014). There is nevertheless a reason to consider this dilemma in relation to Galeotti's theory precisely because the theory is particularly concerned with multicultural cases that from the domestic perspective are matters of internal minority groups but which in a broader perspective are at the same time also matters of international politics and security. So, there is specific reason for Galeotti to consider this complication.

The meaning of social intolerance

Shifting to the social level, the first question here is what it means in normative terms that the publication of the cartoons (or, even more clearly, burning of the Quran) is an act of social intolerance.

Normally (cf. Lægaard 2021: 527), even if an act is described as intolerant, it is a different question whether this intolerance is justifiable or not. So, description of the cartoons as a socially intolerant act does not necessarily imply that it was wrong, just as description of (non-violent) Muslim responses to the cartoons as responses to intolerance does not imply that they are therefore justified.

But Galeotti's concept of toleration is not purely descriptive. In fact, she starts out by criticizing descriptive conceptions of toleration and, while she does not subscribe to a moralized notion that sees toleration as always based on moral reasons, her theory still seeks to provide a normative account, which makes sense of toleration as valuable (2021: 88). The normative component of toleration as recognition is the value of equal respect and inclusion into full citizenship. These values provide the normative conditions under which toleration, according to Galeotti's theory, is valuable. This means that, when she categorizes an act as tolerant, this means that it is *prima facie* commendable. And when she describes an act as intolerant this means that the act is *prima facie* wrong. This seems supported by her remarks that "the moral recommendation to publish could easily be trumped by the reasons in favor of tolerant self-restraint" (2021:

100), which suggests that the publication was morally wrong because it was a form of social intolerance rather than self-restraint.

If Galeotti's characterization of the cartoons as socially intolerant means that it was therefore morally wrong to publish them, this is arguably even more so the case for the more recent Quran burnings by self-declared opponents of the so-called Islamization of Denmark, which are clearly and unequivocally forms of social intolerance of Muslims. But even though the Quran burnings provide an easier case of social intolerance of Muslims, they also provide an illustration of the challenged facing such judgments. Even though most Quran burnings were carried out by self-styled Danish patriots, some of the public displays were carried out by refugees from Islamic countries who desecrated the Quran as a way of protesting human rights abuses performed by Islamic regimes with reference to the Quran. A prominent example was the Danish-Iranian performance artist, Firozeeh Bazrafkan, who conducted a public shredding of the Quran outside the Iranian embassy in Copenhagen while wearing a t-shirt with the slogan of the Iranian campaign for women's rights. Just as most of the Quran burnings were clearly and explicitly forms of social intolerance of Muslims and with limited expressive value considered as contributions to democratic political debate, actions like Bazrafkan's performance are just as clearly responses to the intolerable oppression by the Iranian regime and important political statements as such.

If the characterization of the cartoons (and, even more clearly, the Quran burnings) as socially intolerant means that they were morally wrong, what about acts such as Bazrafkan's performance? Are these kinds of acts not intolerant, but rather responses to intolerance, albeit intolerance taking place in other countries? The same kind of question can be posed in relation to publications of the cartoons. Even if one accepts Galeotti's characterization of the initial commissioning and publication of the Danish cartoons as socially intolerant and therefore morally wrong, some of the subsequent republications of the cartoons were clearly responses to intolerance in the form of attacks on Danish embassies and terrorist threats and outright attacks on the newspaper, the cartoonists, and other media such as *Charlie Hebdo*. Even if the original publication was

socially intolerant and morally wrong, are the latter republications not responses to intolerance and therefore morally permitted?

To make such differentiated judgments, Galeotti's theory must provide a basis for distinguishing between different instances of the same objective act (the publication of a given cartoon of the Prophet or the improper treatment of a holy book) in a way that justifies characterizing some instances as intolerant and accordingly morally wrong and others as responses to intolerance and accordingly morally permitted. One way of doing this is by saying that some persons or groups have social power and thus have the opportunity to be tolerant or intolerant, whereas others lack such power. But this will arguably not work in these cases. A performance artist like Bazrafkan can command public attention and support by her act and the media republishing the cartoons had the same social power as the newspaper doing the original publication. So, to differentiate, it seems that the reasons for the acts in question have to be taken into account. Is the difference simply that it is morally right to protest against oppression of women in Iran but morally wrong to burn Qurans to exclude Muslims in Denmark? If so, then the theory of toleration seems to become a fully moralized account, where an act is intolerant because morally wrong and tolerant because morally right. But what work is the concept of toleration then doing?

Toleration as a transitional social virtue

Galeotti's analysis is that multicultural controversies should be understood in terms of relations of social power. Multicultural controversies arise with the introduction of diversity, e.g. due to immigration, where newcomers do not know or share the social standards and related expectations of the majority. A multicultural society, according to Galeotti, is one in which citizens not only respect each other's legal rights but respect one another as equal citizens in a broader sense. This requires civility understood as the disposition to avoid frictions with others in daily interactions and to treat others as they expect to be treated. The problem is that civility presupposes social standards for what counts as appropriate treatment, and multiculturalism controversies often precisely arise when different groups disagree about such standards. In

such cases, Galeotti (2017) argues that toleration has a distinct role to play as a disposition that should be adopted between members of the majority and minorities while new social standards are being negotiated. So, toleration as a transitional social virtue is needed to make room for the reconfiguration of social standards that will enable all members of a multicultural society to display the virtue of civility.

The question is what this might mean in cases like the cartoon controversy or the more recent Quran burnings. The analysis in terms of disagreement about social standards and expectations is clearly accurate in these cases where the whole point of the cartoons and the Quran burnings was to do something thought to clash with the normative expectations of many Muslims (for analysis of the cartoon controversy in terms of civility, see Lægaard 2014). If toleration is a transitional social virtue, the question is what kind of transition is needed and who should be tolerant?

One explicit motivation behind the original publication of the cartoons was to integrate Muslims into the valuable Danish tradition of satire, thereby affirming that Muslims could be equal citizens. According to this view, the required transition is one in which Danish Muslims should adjust their social standards. Given Galeotti's interpretation of the case as one where the cartoons were acts of social intolerance, it seems that she would not condone this view of the required transition; rather, it seems that she would expect the Danish majority to display tolerance in order to facilitate a transition away from social standards according to which the cartoons were legitimate.

In this kind of situation, the risk is that the minority group challenging the established norms of civility (in this case, norms according to which cartoons of the Prophet are permissible) faces what I have called a "paradox of civility" (2014: 132-135). By attempting to present the cartoons as uncivil, they expose the fact that there is no agreement on norms of civility, and this can just as well lead to a perception of the minority group as uncivil (unwilling to engage in social cooperation according to established social standards) as to the kind of negotiation of new social standards that Galeotti calls for. Even if one thinks that the majority should be tolerant, a perception of a minority group as uncivil is likely to lead some to the opposite response,

which they will themselves see as a response to minority intolerance. So just as civility presupposes shared social standards, toleration as a transitional virtue will be challenging for similar reasons.

Conclusion

Galeotti has articulated the idea of toleration as recognition as a more nuanced theoretical framework that is better able to capture, diagnose, and address the kinds of controversies over differences that have been central to many political and societal debates and which traditional liberal theories struggle to capture in their complexity. But when applied to concrete cases, such as the ones discussed here, even a more nuanced theoretical framework such as toleration as recognition faces the fact that the political and social reality is always more complicated and complex. Types of cases are never simple but cover differences that challenge theoretical categorizations and normative assessments on that basis. Even when one includes a theoretical apparatus of majority-minority power relations, social standards, and civility, it turns out that it is not always clear which group is the minority, whose social standard should change, and what the appropriate attitudes and behaviors to achieve this are in the real world. The fact that the complexity of the real world transcends even more nuanced theoretical frameworks is to be expected and does not show that the theoretical framework is flawed. It does, however, prompt us to consider what we should expect of theories in political philosophy. Philosophical theories are sometimes expected to provide conclusive all things considered answers to controversial questions. As indicated here, this may often be too much to expect. But theories can also be understood as frameworks that structure our view of cases and controversies and which thus alert us to aspects that might otherwise be forgotten or suppressed, and which makes us better able to diagnose what is at stake in specific cases. Galeotti's theory of toleration as recognition succeeds in doing this, precisely because it also shows the different dilemmas and contrasting considerations that appear once we include the broader theoretical perspective she proposes. Galeotti's political philosophy is thus the kind that contributes to public ethics by adding to and nuancing the issues rather than simplifying and insisting on the primacy of one kind of consideration. This encourages a kind of reflexivity that is often needed in public debates over controversial issues, such as the ones central to many debates on multiculturalism.

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