LIKE A PRAYER? APPLYING *CONFLICTS WITH RELIGIOUS DIMENSIONS* THEORY TO THE "MUEZZIN LAW" CONFLICT

Yael Efron[*]
Michelle LeBaron[**]
Maged Senbel[***]
Mohammed S. Wattad[****]

ABSTRACT

What is the nature of the dispute around an Israeli law that proposes restricting how Muslim followers are called for prayer? And, why does the nature of this dispute hold any importance? LeBaron and Senbel have developed a theory differentiating conflicts with religious dimensions (CRDs) from other types of conflicts. The importance of this distinction stems from and highlights the unique role that religion plays in conflicts, which liberal, rational, and individualistic orientations to conflict management fail to address.

This article offers a trial run of LeBaron and Senbel's innovative theoretical framework. We apply CRD theory to conduct an analysis of a legislative attempt to amend an environmental law in Israel. The proposed amendment would limit the use of public address (PA) systems to amplify the Muezzins' calls for prayer. Across the Islamic world, Muezzins' amplified voices ring out from the minarets of every mosque, calling their congregants for prayer. Proposed limitations on this Islamic practice

triggered a public outcry and a sharp societal dispute in Israel. The analysis in this article exposes the real conflict over the proposed amendment to be a CRD, rather than what is seemed on its face: an environmental regulation conflict.

The article also contributes to further developing CRD theory. We elaborate on the combined effects of the conflict's intensity, its duration, and the proximity of its subject to the core values of a religion. We suggest that identifying the unique amalgam of these aspects in a CRD is important to its effective management.

INTRODUCTION

Muezzins call faithful Muslims to prayer every day. At all times of day, including early mornings, their amplified voices ring out from the minarets of every mosque across the Islamic world. An Israeli law ("the Muezzin Law") attempting to limit the volume of these calls, has been the focus of sustained conflict for more than seven years.[1] In this article, we examine competing claims between those who see the Muezzin Law as infringing upon the religious freedom of Muslims in Israel and those who regard it as mere noise-hazard regulation. What is the real nature of this dispute? Why does its nature hold any importance? In this article, we analyze why the nature of this dispute matters. We also describe and expand a theoretical framework for understanding and addressing similar types of conflicts.

In their recent work, Michelle LeBaron and Maged Senbel developed a theory that differentiates conflicts with religious dimensions (CRDs) from other types of conflicts.[2] CRDs are those with some religious aspects, even if they are not explicitly or exclusively about religion. This religious dimension manifests when some or all of those involved in the conflict "understand, interpret, or respond to the conflict through deep-rooted ontologies."[3]

Religious conflicts are seen by some as a subset of worldview conflicts.[4] Any difference in worldviews between people may be perceived or

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1.   *See infra* Part II.
2.   Michelle LeBaron & Maged Senbel, Conflicts with Religious Dimensions: Why They Matter and How to Engage Them (unpublished manuscript) (on file with the Washington University Journal of Law and Policy).
3.   *Id*. at 5.
4.   *Id*. at 22-24.

experienced as an implicit challenge to the way in which one satisfies their need for meaning.[5] Hence, any worldview difference may threaten identity.[6] Through this mechanism, the mere presence of religious differences may generate or escalate deeply rooted conflict. Such deeply rooted conflicts at least feel as though they are endangering delicate societal fabrics and thus might escalate into violent disruption. Such violence was demonstrated in the September 11th attacks, in the conflict in Northern Ireland, on the Temple Mount in Jerusalem, and more. LeBaron and Senbel's working definition of CRDs proceeds from an awareness of indivisibility; CRDs are conflicts in which religion and sacred values shape histories, current narratives, and future possibilities in ways that cannot be disentangled for at least one of the individuals or social groups involved in the conflict.[7]

The importance of labeling CRDs as a particular type of conflict stems from the unique role that religion plays in conflicts—a role that liberal, rational, and individualist works like *Getting to Yes*[8] fail to address.[9] Since CRDs involve threats or perceived danger to identities and to deeper meanings and values, addressing material or even relational aspects of these conflicts cannot suffice. A more holistic approach is required to avoid escalation, and symbolic aspects of the conflicts—also insufficiently discussed in the literature[10]—must be considered when examining CRDs.

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5. JANE S. DOCHERTY, LEARNING LESSONS FROM WACO: WHEN THE PARTIES BRING THEIR GODS TO THE NEGOTIATION TABLE 22-27 (2001) ("[P]eople to some extent 'create' their worlds by naming them. They do not simply perceive, more or less accurately, an objectively given and stable reality"); OWEN FRAZER & RICHARD FRIEDLI, APPROACHING RELIGION IN CONFLICT TRANSFORMATION: CONCEPTS, CASES AND PRACTICAL IMPLICATIONS 15 (2015) ("Statements that may make sense in one system will be viewed as irrational or illogical in another.").

6. LeBaron & Senbel, *supra* note 2, at 9.

7. *Id*. at 4.

8. ROGER FISHER & WILLIAM URY, GETTING TO YES: NEGOTIATING AGREEMENT WITHOUT GIVING IN (Bruce Patton ed., 2011).

9. MICHELLE LEBARON, BRIDGING TROUBLED WATERS: CONFLICT RESOLUTION FROM THE HEART 191 (2002); Harold Abramson, *Outward Bound to Other Cultures: Seven Guidelines for U.S. Dispute Resolution Trainers*, 9 PEPP. DISP. RESOL. L.J. 437, 441-43 (2009) (explaining how interests and identities are intertwined and make "separating people from the problem" impossible, how objective criteria are irrelevant in certain contexts, and how individual generation of options is unacceptable is certain communities).

10. LeBaron & Senbel, *supra* note 2, at 13; *see also, e.g.,* NINIAN SMART, THE WORLD'S RELIGIONS (2d ed. 1998) (looking at the world's religions in terms of world history, and as constantly developing systems of belief); CLIFFORD GEERTZ, THE INTERPRETATION OF CULTURES (1973) (providing an anthropological account of the influence of culture and religion on personal identities); GEORGE LINDBECK, THE NATURE OF DOCTRINE: RELIGION AND THEOLOGY IN A POSTLIBERAL AGE

Addressing such conflicts with their true nature in mind is crucial to limiting the possibility of their violent escalation. CRD theory offers practical tools to apply to all levels of the conflict—material, relational, and especially symbolic—in order to contain the conflict and foster a sustainable resolution.[11]

The Muezzin Law offers the perfect case with which to take LeBaron and Senbel's innovative theoretical framework for a test drive, and doing so is the main focus of this article. Applying CRD theory to the conflict will help us tease out whether this is, in its essence, an environmental conflict (as its initiators label it) or a CRD, posing a threat to the identity of Jews in Israel by a Muslim symbol.

In this article, we also identify underdeveloped aspects of CRD theory and offer an elaboration. We add a more detailed analysis of a conflict's nature, which must consider all of its discrete elements and the way they are combined. We claim that the combination of a conflict's intensity, its duration, and the proximity of its subject to the core values of a religion are key to understanding its nature. Our expansion of CRD theory suggests that identifying the unique amalgam of these aspects in each conflict directly affects intervention possibilities and likelihoods of success.

The structure of the article combines positivist analysis and normative critique. Part I describes CRD theory, its contribution to conflict resolution theory more broadly and its importance for conducting conflict analysis and management activities. Part II describes the attempts to pass the Muezzin Law into legislation and the conflict these efforts have sparked. Applying CRD theory to this case reveals its nature as a CRD. Part III offers further development of CRD theory, aiming to fill a theoretical gap exposed by its application to the Muezzin Law conflict. Finally, Part IV discusses the legal and practical implications of this elaboration.

I. CRD THEORY

CRD theory relies on two conceptual pillars. The first is the importance of religion, even in modern life, and its relevance to conflict. Democratization—including the liberal freedoms this typically entails—

(1984) (laying the foundation for a theology based on a cultural-linguistic approach to religion and a regulative or rule theory of doctrine).

    11.   LeBaron & Senbel, *supra* note 2, at 27-33.

modernization, and urbanization have not led to the secularization once predicted to be inevitable.[12] The second pillar involves a more holistic and inclusive approach to conflict. By now, it is common knowledge that neoliberal, individualistic, and so-called rational theories of conflict fall short of yielding comprehensive and sustainable resolution to deep-rooted conflicts, such as religious conflicts.[13] Discarding dichotomies inherent in conventional approaches to conflict may expand cognitive frames to reconcile apparently competing paradoxes, including the paradox between principle and compromise.[14] Therefore, LeBaron's previous work is now harnessed to address CRDs.[15]

The first conceptual pillar of CRD theory suggests that the role of religion in people's lives is key for understanding its dynamics in their conflicts. The vast majority of the world's population identifies with one religious group or another, and if current trends continue, this number will increase in the future.[16] Religious differences are at the root of a growing number of violent conflicts and encompass some of the most intractable conflicts in the world.[17] In religious conflicts, depersonalization often occurs, because one does not necessarily share the other's vision of what is important, nor their perspective of what it means to be fully human.[18] This can lead to tragic consequences. Therefore, new and effective ways of addressing religious differences are needed.

The second conceptual pillar of CRD theory suggests that understanding and addressing CRDs requires a broad theoretical foundation, including philosophy, theology, linguistics, cultural studies, and

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12. Monica D. Toft, *The Politics of Religious Outbidding*, 11 REV. FAITH & INT'L AFF., no. 3, 2013, at 10, 11.

13. *See, e.g.*, LeBaron *supra* note 9 and Abramson, *supra* note 9.

14. BERNARD S. MAYER, THE CONFLICT PARADOX: SEVEN DILEMMAS AT THE CORE OF DISPUTES 3 (2015).

15. MICHELLE LEBARON & VENASHRI PILLAY, CONFLICT ACROSS CULTURES: A UNIQUE EXPERIENCE OF BRIDGING DIFFERENCES (2006) (pushing beyond conventional approaches to develop a theory incorporating a complex combination of material, relational, and symbolic levels of conflict).

16. Owen Frazer, *CARIM: Mediating Conflicts with Religious Dimensions*, *in* BULLETIN ZUR SCHWEIZERISCHEN SICHERHEIRPOLITIK 147 (Christian Nünlist & Oliver Thranert eds., 2013), https://css.ethz.ch/content/dam/ethz/special-interest/gess/cis/center-for-securities-studies/pdfs/CARIM_Mediating_Conflicts.pdf.

17. LeBaron & Senbel, *supra* note 2, at 8-9. Some examples of intractable violent conflicts include Muslim extremist organizations' attacks on Western sites, civil wars in Africa (Congo, Sudan, Sumalia, etc.), and others.

18. *Id*. at 20-21.

other interdisciplinary sources. LeBaron and Senbel support this foundation for their theory by pointing out the meaning-making function of worldviews in general[19] while highlighting the *sacred*, and thus unique, nature of religious values.[20] This sacred quality makes any challenge to meaning a primal threat and resulting conflict resistant to intervention.[21]

Attending to sacred meaning in conflict is a task that is insufficiently discussed in the conflict resolution literature,[22] which lacks a systemic analysis of the intangible. Imagining conflict as three concentric circles, each representing a different level of conflict—material, symbolic, and relational,[23] as illustrated in Figure 1—can assist us in situating the sacred dimension of conflict.[24] The boundaries of the circles are not distinct and they all play a crucial role in each conflict. Ignoring any of them will impede effective analysis and intervention.[25]
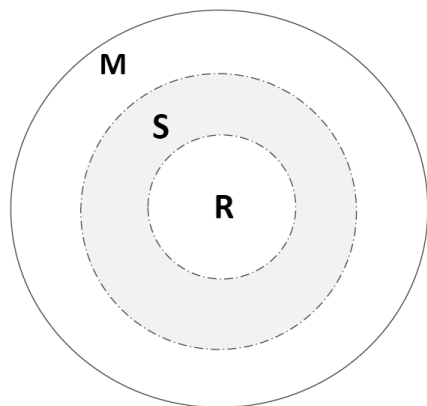
Figure 1: Material, Symbolic and Relational Levels of Conflict

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19. *Id.* at 28 (citing MARY E. CLARK, IN SEARCH OF HUMAN NATURE (2002)) (through meaning-making, humans shape their identities, determine behavior, and shape their perceptions about justice).

20. *Id.* at 21.

21. *Id.* at 12.

22. Scott Atran, Robert Axelrod & Richard Davis, *Sacred Barriers to Conflict Resolution*, 317 SCIENCE 1039 (2007).

23. LEBARON & PILLAY, *supra* note 15, at 19.

24. LeBaron & Senbel, *supra* note 2, at 10.

25. *Id*. at 10.

The material level has always been the primary focus in negotiation and conflict resolution literature.[26] Parties to conflict are generally portrayed as being at odds over material issues (e.g., money, land, possession of items), or things that relate or translate to material issues (e.g., child custody, status, time).[27] The relational level was initially seen as being of lesser importance than the material level, which lends itself more easily to rational analysis and prescription. Its status as an important level of conflict and its resolution is by now widely accepted.[28]

The less-explored symbolic level includes identity and collective self-image, human needs for security and belonging, and sacred meanings and values.[29] The symbolic level connects its adjacent circles by offering meaning to the issues and to the people involved, especially those meanings that resonate with people's identities, values, and worldviews. It emphasizes how identity and ways of seeing the world shape the way we perceive and act on material and relational issues. Intractable conflicts usually contain a significant symbolic element, and this blocks material and relational efforts from resolving the conflict.[30] When struggles over resources or power are entangled with religion, generosity and creativity are not always enough because relational or material actions are "charged" with symbolic meanings.

Acknowledging the symbolic dimension of the conflict in process design and intervention increases chances for healing intractable conflicts. Similarly, focusing only on one or two conflict dimensions and excluding another from conflict intervention will undermine resolution efforts.[31] Symbolic dimensions, if not well-engaged, might escalate a conflict beyond the material or relational aspects of its genesis.[32] For this reason, labeling a conflict a certain way may lead to further intractability. Thus, labeling restrictions on the muezzin's call for prayer as a noise-hazard law—without

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26.   FISHER & URY, *supra* note 8.

27.   FISHER & URY*, supra* note 8, offers an array of examples from landlord-tenant disputes, *id.* at 24, to union-management disputes, *id.* at 64, to international disputes, *id.* at 84.

28.   DOUGLAS STONE, BRUCE PATTON & SHEILA HEEN, DIFFICULT CONVERSATIONS: HOW TO DISCUSS WHAT MATTERS MOST (1999) (offering advice on effective communication to preserve and restore relationships in dire circumstances).

29.   LeBaron & Senbel, *supra* note 2, at 11.

30.   Peter T. Coleman, *Intractable Conflict*, *in* THE HANDBOOK OF CONFLICT RESOLUTION 537-38 (Morton Deutch, Peter T. Coleman & Eric C. Marcus, eds., 2d ed. 2006).

31.   LEBARON & PILLAY, *supra* note 15 at 21.

32.   *Id*.

addressing the symbolic threat that non-Muslims experience when they hear the call or the threat to Muslims' sacred identities when the muezzin is silenced—may carry horrific results. We now present the Muezzin Law in more detail to illustrate these points.

II. THE "MUEZZIN LAW"

A muezzin is the member of the Muslim clergy who calls out from the mosque when it is time for prayer. Around the world, calls take place five times per day, the earliest being the Fajar, at the break of dawn but not before sunrise.[33] Whereas in early days the muezzin's task entailed singing out loudly from the top of the mosque tower, modern technology in the form of electronic PA systems made the call for prayer much easier, enlarging the scope of the sound further than in the past.[34] Thus, five times per day, sometimes as early as 5:00 a.m., the muezzin's calls for prayer are played across Israel.

Many of the cities in Israel host an array of religious believers—Jews, Christians, Muslims, and others. Mosques are found in almost every major city, but also in smaller towns adjacent to areas populated by non-Muslims. Therefore, the muezzin's call for prayer is heard not only by the Muslim community towards whom it is directed, but also by non-Muslim inhabitants of the cities and villages surrounding the mosque.

In 2011, members of Yisrael Beiteinu, a right-wing opposition party in the Israeli Knesset (parliament), first proposed limiting the sound level of the call for prayer from mosques.[35] The proposal was not discussed in 2011,[36] but was submitted again in 2013.[37] Again, it was not discussed, so

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33. SAYYID MUḤAMMAD TAQĪ AL-MUDARRISĪ AL-ḤUSAYNĪ, THE LAWS OF ISLAM (2016) (detailing and explaining, among other religious duties, the prayer as one of the five pillars of Islam)

34. BRYAN WINTERS, THE BISHOP, THE MULLAH, AND THE SMARTPHONE: THE JOURNEY OF TWO RELIGIONS INTO THE DIGITAL AGE 69 (2015) (describing the emergence and worldwide spreading of the use of PA systems in mosques).

35. Draft Bill for Abatement of Environmental Nuisances (Amendment—Prohibiting the Use of Public Address Systems in Houses of Worship), 5771-2011, No. 18/3311 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=411521 [https://perma.cc/U7ND-8Q2Y].

36. *Id.*

37. Draft Bill for Abatement of Environmental Nuisances (Amendment—Prohibiting the Use of Public Address Systems in Houses of Worship), 5774-2013, No. 19/1702 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=488470 [https://perma.cc/PN4K-E4NH].

it was submitted in 2014 to the same Knesset.[38] These persistent efforts to bring the proposal for preliminary discussion in the Knesset finally bore fruit when the proposal was submitted once again by both a member of the prominent Jewish Home party and the chairman of the majority coalition, a Likud member of the Knesset (MK).[39] In the same parliamentary hearing, a similar proposal from 2015[40] was jointly discussed.

The proposed legislation was presented as an amendment to the 1961 Abatement of Environmental Nuisances Law. The original bill lists a series of hazards which are deemed banned, including causing "a considerable or unreasonable noise, from any source whatsoever, if the same disturbs, or is liable to disturb a person in the vicinity or a passerby."[41] The Minister of Environmental Protection is entrusted with the authority to determine what would constitute a "loud or unreasonable noise" and how to treat such noise.[42]

MKs Mordechai Yogev (of Jewish Home) and David Bittan (of Likud) suggested an additional section to the law, as follows:

> No person shall operate a PA system in a prayer house located in a residential area from 11:00 p.m. to 7:00 a.m. the next day; The Minister [of Environmental Protection], with the agreement of the Minister of the Interior, may prescribe an order, in cases where the use of the PA system at such times is allowed; For this purpose, "prayer house" means a synagogue, church or mosque and any other indoor

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38.   Draft Bill for Abatement of Environmental Nuisances (Amendment—Prohibiting the Use of Public Address Systems in Houses of Worship), 5774-2014, No. 19/2915 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=558448 [https://perma.cc/R296-SMCU].

39.   Draft Bill for Abatement of Environmental Nuisances (Amendment—Prevention of Noise from Public Address Systems in Houses of Worship), 5777-2016, No. 20/3590 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=2009510 [https://perma.cc/J7L9-ZT49].

40.   Draft Bill for Abatement of Environmental Nuisances (Amendment—Prohibiting the Use of Public Address Systems in Houses of Worship), 5776-2015, No. 20/2316 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=571798 [https://perma.cc/C64U-4SPC]; *see also Minutes of the Committee on the Constitution, Law, and Justice*, 20th Knesset, Protocol No. 641 (June 19, 2018) (Isr.).

41.   Abatement of Environmental Nuisances Law, 5721-1961, § 2, SH No. 332 p. 58; *see also Pollution and Nuisances*, ISR. MINISTRY ENVTL. PROTECTION, https://www.sviva.gov.il/English/Legislation/Pages/PollutionAndNuisances.aspx (providing an unofficial English translation of this law).

42.   Abatement of Environmental Nuisances Law, 5721-1961 §§ 5-7 (Isr.).

place that is regularly used for prayer or religious
worship.[43]

The explanatory note attached to the proposal states that:

Hundreds of thousands of civilians in Israel, in the Galilee,
Negev, Jerusalem and other parts of the country, routinely
and daily suffer in their houses from noise caused by prayer
systems, which disturb their rest several times a day,
including early morning and night. The proposed law offers
a worldview that freedom of religion should not harm the
sleep and quality of life of citizens and suggests that in
prayer houses the use of night-time PA systems be
restricted.[44]

Three points stand out from the proposed language. First, the proposed
law is said to apply to all religions, not Muslims specifically. Second, the
law refers to the use of a PA system inside a prayer house, not specifically
a mosque. Third, the limitation applies to the use of a PA system, and not to
other sound-making devices. At first glance, labeling the amendment as
environmental and religion-neutral seems reasonable. However, as we
examine the unique nature of the muezzin compared with similar practices
in other religions, a different picture emerges. The Muslim dawn prayer—
the Fajar—is performed before 7:00 a.m., since the sun usually comes out
between 5:00 a.m. and 6:00 a.m.[45] Although Judaism calls believers for
dawn prayers on the last month of the Jewish year (these prayers are known
as "Slichot"), such a call is traditionally done by making door-to-door calls
or by using a portable PA system on a moving vehicle.[46] It does not literally
come from a prayer house. Although the call for prayer for Christian
believers is done from within a church, it is carried out using bells rather
than a PA system.[47]

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43.   Draft Bill No. 20/3590 (Isr.).
44.   Explanatory Note to Draft Bill No. 20/3590 (Isr.) (the same text recurs in all explanatory
notes of all the above proposals).
45.   al-Mudarrisī, *supra* note 33, at 170 (detailing the hours of prayer).
46.   Yehuda Amital, *"Needy and Destitute, We Knock at Your Door"*, THE ISRAEL KOSCHITZKY
VIRTUAL   BEIT   MIDRASH   (Aviad   Hacohen,   ed.,   Gila   Weinberg   trans.,   1990),
https://www.etzion.org.il/en/needy-and-destitute-we-knock-your-door   [https://perma.cc/4B2P-842H]
(explaining the meaning and manner of this tradition).
47.   *See generally* JOHN H. ARNOLD & CAROLINE GOODSON, RESOUNDING COMMUNITY: THE
HISTORY AND MEANING OF MEDIEVAL CHURCH BELLS (2012) (describing the role of church bells in the
call to prayer in Christian communities).

Thus, it becomes clear that this so-called religiously neutral, "environmental" proposal targets a very specific faith. Reviewing the minutes of the legislative proceedings and recorded discussions also reveal the true nature of the proposal and the severe reaction to it. The parliamentary hearings were exceptionally emotional,[48] and despite supporters' insistence on the environmental nature of the legislation, MKs from opposing parties—Jews and Arabs alike—declared it "an attack on a traditional Muslim ceremonious act"[49] and "persecution of Arabs in Israel."[50] The volatile discussions continued in the committee charged to hold hearings and prepare a draft for vote.[51] There, accusations flew from all participants: those who insisted on firm noise control and complained about weak enforcement of existing legislation; those who cautioned against an attack on religious freedoms (interestingly, collaboratively with ultra-orthodox Jewish MKs); and those who accused supporters of racism and anti-Muslim policy.[52]

Why is the nature of the conflict surrounding this legislation so important? It is a question of genuine inconvenience for non-Muslims (and perhaps also for Muslims who prefer to sleep rather than practice the Fajar prayer). The restriction suggested in the proposed law, or a different solution to the noise disruption, could ease the discomfort of many. Is labeling the struggle a CRD useful? We claim that it is. By ignoring the symbolic elements this conflict holds, the means of resolving it are not only very limited, they might even escalate the conflict.

Regulating the material aspect, such as fining the muezzin who operates the system or confiscating the PA system itself, would hardly deter a pious

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48. *The Muezzin Laws Were Pre-Approved*, THE KNESSET (Mar. 8, 2017, 9:15 AM), https://main.knesset.gov.il/News/PressReleases/Pages/press8317t.aspx [https://perma.cc/648E-LTTB].

49. *Id.*

50. *Id.*

51. In the course of negotiations regarding the proposal, a feisty discussion was held regarding which committee was authorized to prepare the proposal for legislation. Supporters of the amendment urged to transfer discussions from the Interior Affairs committee, entrusted with matters of environmental protection, to the Constitutional committee, since the former delayed deliberations for years. Objectors, in response, called out the law to be an infringement on the freedom of religion, otherwise it has no place in the Constitutional committee. *Minutes of the House Committee*, 20th Knesset, Protocol No. 280, at 24-27 (July 24, 2017).

52. *First Discussion of the Meuzzin Law at the Constitutional Committee: Torah Judaism Party Objects to Promoting the Legislation*, THE KNESSET (June 19, 2018, 5:10 PM), https://main.knesset.gov.il/News/PressReleases/pages/press19.06.18n.aspx# [https://perma.cc/R23E-JNU6].

believer from their religious duty. Even engaging the relational aspect of interests of the neighboring communities holds very little hope for resolution without a thorough understanding of the symbolic role of the muezzin in Muslim communities on one hand, and of the threat to the identity of Jews in Israel posed by a Muslim public, on the other. Israel, identified by most of its citizens as the national home of the Jewish people, is also home to a variety of non-Jewish citizens, composing more that 20% of its population.[53] The Jewish majority and many non-Jewish minorities self-identify as Israelis, differing in their religious affiliations.[54] Each holds conflicting views of the State's role in regulating behaviors that correspond with Jewish practices (such as observing Shabbat or kosher food) and formal symbols (like the menorah or the star of David).[55] This conflict is deeply rooted in values, identities, and a sense of being. These cannot be ignored.

LeBaron and Senbel identify several theories of religion related to CRDs and process design intervention: propositional-cognitive, experiential-expressive, and cultural-linguistic.[56] In addition, they note that religion can be seen as encompassing moods and motivations, as being a system of symbols, or as prescribing a general order of existence.[57] Applying the above theories to the Muezzin Law, it is clear that it is a CRD, involving aspects of the above theories. Below, we explore how these theoretical lenses make the nature and dynamics of the Muezzin Law more comprehensible.

The propositional-cognitive theory[58] is the least suitable for proving our claim. It interprets a religion as a series of truth claims about objective

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53.   ISR. CENT. BUREAU OF STATISTICS, STATISTICAL ABSTRACT OF ISRAEL 2019—NO. 70 § 2.2 (2019),   https://www.cbs.gov.il/he/publications/doclib/2019/2.shnatonpopulation/st02_02.pdf [https://perma.cc/AKW6-5AZ2].

54.   Anna Knafelman, Naomi Himeyn-Raisch & Yael Hadar, מי אנחנו? זהות לאומית במדינת ישראל [*Who Are We? National Identity in the State of Israel*] (*Mi Anachnu? Zehut Leumit BiMdinat Israel*), ISR. DEMOCRACY INST. (Apr. 24, 2008), https://www.idi.org.il/parliaments/10290/10741 [https://perma.cc/DR38-KQYL]; Amnon Rubinstein & Gal Kelner, לאום לוט בערפל [*Peoplehood Shrouded in Fog*] (Leom Lot BaArafel), 28 כתב-העת משפט ועסקים [LAW & BUS. J.] (MISHPAT VAASAKIM) 1,   14   (2019),   https://idclawreview.files.wordpress.com/2019/08/rubinstein_kelner.pdf [https://perma.cc/X8AY-PL7T].

55.   *Id.*

56.   LeBaron & Senbel, *supra* note 2, at 18.

57.   *Id.* at 11-20.

58.   Lindbeck, *supra* note 10.

realities.[59] It would be inaccurate to regard the use of PA systems in Mosques as a prescribed religious proposition. It is a common evolved practice, but not core to the teachings of Islam.[60] More broadly, this substantive approach to religion has fallen into the shadow due to its failure to account for religions' dynamism.[61] The use of technology to aid the call to prayer is a stark example of such dynamism.

The experiential-expressive theory[62] is more useful, as it acknowledges that interpretations or attachments to experiences may be perceived as conflictual. This frame accents how historically contingent cultural practices (rather than deeper faith differences) cause friction.[63] When religious practices are seen as experiential and expressive, PA systems for the Fajar, rather than Muslim beliefs themselves, come into focus as central in the conflict. The freedom to pray to Allah is not contested in this conflict. Rather, the controversy centers around the observing the practice at a particular time—when most non-Muslims sleep—and place—a charged area with a history of bloody disputes between Muslims and non-Muslims.[64] Therefore, an experiential-expressive approach serves as a useful lens for understanding this conflict.

The cultural-linguistic perspective[65] draws an analogy between religion as a way people construct coherent lives and how grammar lends coherence to sentences. This perception can explain the parties' needs for structure, unity, and certainty as well as their aversion from change. The essence of religion—as it is understood by this theory—is not a particular teaching, as suggested in the propositional theory, but evolving meanings of its symbols in changing times. Like grammar, religion develops historically through social interactions.[66] As with grammar, judgment attaches when religion is perceived to be misused. Grammar is often thought of as objective and

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59.   *Id*. at 24.
60.   Winters, *supra* note 34, at 69.
61.   LeBaron & Senbel, *supra* note 2, at 17.
62.   Lindbeck, *supra* note 10, at 32.
63.   Molly Haslam, *Language as Expression: A Wittgensteinian Critique of the Cultural-Linguistic Approach to Religion*, 28 AM. J. THEOLOGY & PHIL., no. 2, 2007, at 237, 238.
64.   NEIL CAPLAN, THE ISRAEL-PALESTINE CONFLICT: CONTESTED HISTORIES (2019).
65.   LINDBECK, *supra* note 10, at 33; GEERTZ, *supra* note 10 (analyzing culture as a communal phenomenon that shapes beliefs and identities).
66.   LeBaron & Senbel, *supra* note 2, at 18-19.

value-neutral,[67] similar to noise that disrupts sleep in the Muezzin Law conflict. Any deviation from that perceived objective norm is unacceptable. But religion is not only objective.[68] In its subjectivity, it is much more prone to personal interpretations. For Muslim believers, the Fajar prayer is a sacred call, lending coherence to their lives. Deviating from this practice thus feels like an attempt to subvert not only religious practices, but the religion itself.

If religion is a system of cultural symbols, the focus moves to shared symbolic experiences that unite communities of religious believers.[69] Religious symbols unify and reinforce experiences of community. Joint prayers in commemoration of beloved, communal rituals around milestones in individual lives (Bris and Bar Mitzva, for example) and public acknowledgement of religious holidays (such as Christmas decorations) all make religion a community affair rather than an individual belief alone. For this reason, symbols not only denote a religion, they also shape it. How the muezzin calls the faithful for prayer is not only functional, it also symbolizes religious presence and unity for many Muslims. For many, tampering with a symbol might be conceived as tampering with sacred religious realities.

If religion is seen as a constellation of moods and motivations,[70] we see the Muezzin Law in a different light. Here, conflict analysis extends beyond a systemic symbolic epistemology into a tangible realistic experience, incorporating temperaments, sensing, and feeling.[71] Sounds are integral parts of the sensory experience of religion. Interfering with religion's power to generate particular moods and motivations is thus very threatening.[72] Such an attempt to interfere with the physical sensations and moods arising from the muezzin's call is experienced as an intervention in the religious experience itself.

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67. This describes the prescriptivist linguists' view of grammar, although there are other opinions. Donald G. Mackay, *On the Goals, Principles, and Procedures for Prescriptive Grammar: Singular* They, 9 LANGUAGE SOC. 349 (1980).

68. The difference in prespectives amongst the Christian churches serves as an example of subjective interpetation of the scrtiptures; so does the diversity in strictness of adherence to the religious norms amongst followers of all religions.

69. GEERTZ *supra* note 10, at 91.

70. *Id*. at 90.

71. *See* LeBaron & Senbel, *supra* note 2, at 15.

72. *Id*. at 16.

Finally, a systemic perspective views religion as a general order of existence.[73] All societies confer and reflect coherence and existential meaning using shared symbols.[74] Symbols assure us that a meaning exists and thus they are a key element in resilience.[75] From religious perspectives, rituals are sacred as shared symbols that not only reflect, but also create, meaning.[76] The notion of interconnectedness is a source of hope for believers.[77] If confidence in or access to key symbols is undermined, believers' bedrocks of being can feel threatened. Thus, it is quite likely that the muezzin's call, a longstanding ritual, is a shared sacred practice central to many Muslims' "order of existence."

From the above discussion, it is clear that interfering with the muezzin's Fajar call, despite attempts to categorize it as a noise restriction, is a direct intervention in Muslim ritual, and thus a CRD. Addressing such conflict with its true nature in mind is crucial to containing and engaging it, and to limiting violent escalation.

III. ELABORATING CRD THEORY

The importance of CRD theory is the distinction it draws between CRDs and other types of conflict.[78] This distinction is crucial both for understanding a conflict and for designing and implementing prospective interventions. However, not all CRDs are similar. This section elaborates further distinctions related to CRDs. The importance of these distinctions relates to the truism that different types of conflicts call for specific process designs and interventions.[79] Although many CRDs spiral into violent whirlwinds,[80] not all of them do. Some may be contained early and easily, while for others, such possibilities are already long gone. Additional analyses are required to differentiate them one from the other. This part first

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73.   GEERTZ, *supra* note 65, at 90.

74.   LeBaron & Senbel, *supra* note 2, at 14.

75.   *Id.*

76.   *Id*. at 15.

77.   *See generally* MARY E. CLARK, IN SEARCH OF HUMAN NATURE (2002).

78.   LeBaron & Senbel, *supra* note 2.

79.   John P. Conbere, *Theory Building for Conflict Management System Design*, 19 CONFLICT RESOL. Q. 215 (2001) (explaining the importance and variety dispute system design).

80.   LeBaron & Senbel, *supra* note 2, at 7-9 (explaining how religion may influence and radicalize adherents).

introduces the elaborated CRD theory, and then applies it to the Muezzin Law conflict.

Three elements differentiate CRDs from each other: the intensity of the conflict, the duration of the conflict, and the proximity of a conflict issue to the core values of a religion. A CRD can be short-term[81] or long-lasting.[82] It can be highly intense, even violent,[83] or less turbulent.[84] Its connection to core religious values can be very close, such as the duty to observe Shabbat, or further detached, like maintenance of the prayer house. We now describe these elements and their contributions to conflict analysis in detail.

A. Intensity

The intensity of a conflict has a proven effect on the motivation of the parties to engage in efforts toward prevention and resolution.[85] The intensity of a conflict must be considered when intervention is designed. Research shows that, in low-intensity conflicts, people's attention tends to be oriented toward goals external to relationships (more task-oriented) than towards goals intrinsic to the relationship (relationship-oriented). [86] Including both task-oriented and relationship-oriented frames is important to effective CRD process design and intervention, as intensity may not always be obvious on the face of a conflict. Symbolic frames are also vitally important in process design, as the potency of ceremonies, rituals and other aesthetic dimensions are considered.[87] In high-intensity conflicts, escalation

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81.   An example of a CRD that lasted mere moments can be seen in Pope Francis' reaction to a woman who forcefully grabbed him. Guardian News, *Indignant Pope Francis slaps woman's hand to free himself at New Year's Eve gathering*, YOUTUBE (Dec. 31, 2019), https://www.youtube.com/watch?v=3WySwhj2SwE [https://perma.cc/8Y44-2CSE].

82.   The Israeli-Palestinian conflict is an example of a long-lasting CRD. *See* CAPLAN, *supra* note 64.

83.   *Id*.

84.   Such as the divide among the Christian churches today, in contrast to its genesis.

85.   Peter T. Coleman, Katharina G. Kugler, Robin R. Vallacher & Regina Kim, *Hoping for the Best, Preparing for the Worst: Regulatory Focus Optimality in High and Low-Intensity Conflict*, 30 INT'L J. CONFLICT MGMT. 45 (2019) (proposing an optimal regulatory focus in conflict that reflects a mix of promotion and prevention considerations, with the conflict intensity as one of the factors considered).

86.   *Id*. at 60.

87.   LeBaron & Senbel, *supra* note 2, at 39.

prevention and policy leadership will be important.[88] In CRDs, addressing the ineffable, neither task- nor relationship-oriented, becomes vital.[89]

B. Duration

The duration of the conflict is not a mere chronological matter. Past events continue to affect current relations and conflict parties are influenced by past traumas when imagining new futures.[90] Since conflict dynamics evolve over time, a conflict is affected both by the timeframe and the timeline of the conflict.[91] In what era did the conflict commence? How long has it been since it began? What happened over this time? Of course, parties to the conflict may assert differing answers to these questions.

The more that has happened, the richer the conflict's context. Parties might carry layers of emotional baggage or distrust, but also more knowledge about their own and the others' interests and values.[92] Therefore, newly formed conflicts are not necessarily easier to resolve. The combination of timeframes and timelines with other CRD dimensions, including intensity and the proximity to core values, will determine whether the conflict may be resolved.

C. Core Values

Core values are intrinsic to religion,[93] but not all CRDs revolve around core values. Religion often intersects with politics and ideology and thus cannot be easily isolated in conflict analysis.[94] The core values of a religion are not necessarily found in its teachings, but rather in the role and nature

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88.   Coleman et al., *supra* note 85.
89.   LeBaron & Senbel, *supra* note 2, at 38-39.
90.   Vamik D. Volkan, *Transgenerational Transmissions and Chosen Traumas: An Aspect of Large-Group Identity*, 34 GROUP ANALYSIS 79 (2001).
91.   Patrick M. Regan & Allan C. Stam, *In the Nick of Time: Conflict Management, Mediation Timing, and the Duration of Interstate Disputes*, 44 INT'L STUD. Q. 239, 257 (2000) ("[T]he most important dimension of a contextual understanding is the role of event timing or phases within conflicts.").
92.   LeBaron & Senbel, *supra* note 2, at 4.
93.   Bridget Moix, *Matters of Faith: Religion, Conflict and Conflict Resolution*, *in* THE HANDBOOK OF CONFLICT RESOLUTION: THEORY AND PRACTICE 582, 588 (Morton Deutsch, Peter T. Coleman & Eric C. Marcus, eds., 2d ed. 2006).
94.   LeBaron & Senbel, *supra* note 2, at 39.

of a religion in a particular context.[95] The more central religion is to identity in a particular setting, the more likely it is to be implicated in conflict with different others.[96] Therefore, determining how close an issue in conflict is to the core values of the religion is a contextual task.[97] Once an issue is intertwined with religion, whether because of religion's role in a particular context or due to religious teachings themselves, its symbolic charge increases.[98]

D. Application to the Muezzin Law

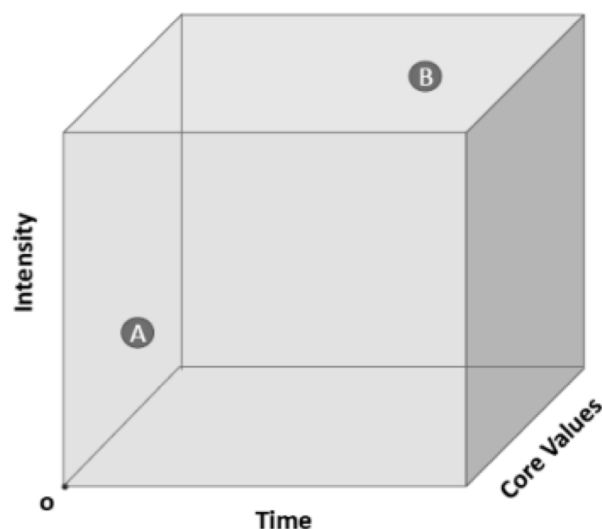The following diagram illustrates the interaction among these three elements.

Figure 2: Intensity-Time-Core Values combination

In this diagram, conflict A is shorter, less intense and not closely related to the core values of the religion in comparison with conflict B. For

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95.   Moix, *supra* note 93, at 591-92.
96.   *Id*. at 593-94.
97.   *See* DOCHERTY, *supra* note 5 (describing an account of failure to conduct such contextual evaluation).
98.   LeBaron & Senbel, *supra* note 2, at 11.

example, conflict A could represent a dispute concerning a clergy election in a church, while conflict B could represent dispute over the holy basin in Jerusalem.

With this framework in mind, the Muezzin Law conflict can be analyzed related to intensity, timeframe, and proximity to core values. Despite harsh language and verbal protests, this conflict is of minimal intensity, especially in comparison to other interfaith conflicts in the area.[99] In terms of time, the conflict around the proposed legislation is less than a decade old.[100] In an area stricken with blood and tears for thousands of years, this is a short-term conflict. However, in contextually evaluating this dispute, it surfaces as one of many disputes around the identity of the State of Israel as Jewish state and the place of non-Jews in the public sphere.[101] This broader view of the conflict is at least seventy-two years old, with much upheaval. When examined on a larger scale like this, the conflict is much longer term. As to the proximity of the core values of the religion, it is quite proximate given that it interferes with sacred religious rituals. The Muezzin call for prayer is a practice that, for many Muslims, is a part of prayer itself.[102]

This analysis shows why the proposed legislation stirred up so many intense emotions, both for its opposers and its supporters. Particular attention to symbolic aspects is important in intervention design to avoid escalation or conflict enlargement. LeBaron and Senbel warn us from ignoring religious dimension of a conflict, placing these dimensions in a larger context.

Combined with a cocktail of perceived social, economic and political injustice or historical hegemony, the mere existence of religious differences can exacerbate deep-rooted conflict. The potency and potential violent

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99.   *See e.g., 60 Arrested as Police Brace for Temple Mount Violence After Friday Prayers*, TIMES ISR. (Feb. 22, 2019, 11:22 AM), https://www.timesofisrael.com/60-arrested-as-police-brace-for-temple-mount-violence-after-friday-prayers/ [https://perma.cc/UBJ2-MKA9].

100.   Draft Bill for Abatement of Environmental Nuisances (Amendment—Prohibiting the Use of Public Address Systems in Houses of Worship), 5771-2011, No. 18/3311 (private member bill), https://main.knesset.gov.il/Activity/Legislation/Laws/Pages/LawBill.aspx?t=lawsuggestionssearch&la witemid=411521 [https://perma.cc/U7ND-8Q2Y]

101.   For example, a dispute over a basic law declaring Israel "the nation state of the Jewish people" flared a societal protest in Israel. *See Druze-Led Rally Against Nation-State Law in Tel Aviv Draws at Least 50,000*, TIMES ISR. (Aug. 4, 2018, 8:31 PM), https://www.timesofisrael.com/tens-of-thousands-gather-in-tel-aviv-to-protest-controversial-nation-state-law/ [https://perma.cc/7Y2L-P5T7].

102.   al-Mudarrisī, *supra* note 33.

repercussions of inadequate conflict analysis and intervention in CRDs makes them an important focus for our field.[103]

IV. LEGAL AND PRACTICAL IMPLICATIONS

Recognizing the complex interplay of religious dimensions of conflict offers important lenses for conflict analysis and intervention. This recognition broadens the scope of possible engagements on the one hand, while avoiding relational and material landmines on the other. LeBaron and Senbel articulate several implications for third-party intervention of identifying a conflict as a CRD.[104] In this article, we have taken this work a step further, casting a spotlight on the unique amalgam of a conflict's duration, intensity, and proximity to a religion's core values.[105] This final section conducts CRD theory into a jurisprudential realm, highlighting the legal significance of identifying a dispute as a CRD. The Muezzin Law conflict is a test case for such analysis.

Identifying the Muezzin Law conflict as a CRD yields interventions that address not only material and relational aspects of the conflict, but its symbolic level as well. At this level, memories and sacred meanings are intertwined with identity.[106] We suggest that, when combined, these render any mere legal solution to such conflicts—such as a legislative amendment or judicial review—insufficient and not durable. While interventions such as these may affect the legal reality, we predict that the conflict itself will persist; if ignored, it might escalate into violence.

Addressing a CRD without carefully evaluating its intensity, its duration, and its proximity to core religious values could render interventions ineffective. Irrelevant symbols may be targeted if these three aspects are not considered.[107] If the Muezzin Law conflict is understood as a CRD with particular intensity, duration, and proximity to core values, interventions can be tailored to address how individuals and groups, both supporters and detractors of the proposed legislation, view themselves and

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103. LeBaron & Senbel, *supra* note 2, at 4.
104. *See id*. at 25-33.
105. *See supra* Part III.
106. LeBaron & Senbel, *supra* note 2, at 4.
107. For example, using the mosque's PA system for playing local music, to symbolize the joint geography and regional unity, could have opposite results.

their relations to others. Though the muezzin dispute is relatively low-intensity, it has the potential to escalate and enlarge. We have seen that it is not a "young," less-than-a-decade-old dispute; rather, it is yet another episode in the ongoing seventy-two-year conflict between Israel as a state of Jewish people and its non-Jewish citizens.[108] By refusing to accept at face value the environmental frame for the proposed law, we see how it is experienced as intentional interference with religious practices quite close to the core of Islam.

Intervention in this issue thus needs to focus on cosmological language because each side places fundamental value on their narratives, concepts, and institutions as related to core values like justice, fairness, truth, and duty.[109] Seeing these issues as related to "bedrocks of being" of those involved in the conflict may generate richer dialogue by incorporating elements of respective religious discourse that are spacious enough to encompass all worldviews.[110] According to LeBaron and Senbel, such language borrows heavily from the symbolic domain, and from narratives and rituals.[111]

Dialogue about the Muezzin Law conflict must thus incorporate the narratives and symbolic language used by each side. It must address metaphoric understandings of what it means to be a Jew or a non-Jew in Israel, and of how each side experiences the call for prayer. Is it an aesthetic sensation or a noise intrusion? How does each side understand the use of the PA system when calling for the Fajar—as an organic evolution of a religious practice or as a mere mechanic addition to it lacking inherent spiritual significance? For example, art could be powerful in addressing these issues, since the muezzin's call for prayer is performed by singing. Addressing the issue aesthetically, even as parties to the dispute hold differences in affection related to its language and style, might create more commonalities and tolerance than a purely rational analysis of the art.[112]

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108. *See supra* note 101 and accompanying text.

109. Oscar Nudler, *On Conflicts & Metaphors: Towards an Extended Reality*, *in* CONFLICT: HUMAN NEEDS THEORY 177, 197 (John Burton, ed., 1990). Differences in what is fair and just could be found in the value attributed by each side to the communal call for prayer versus the protection of privacy and serenity in one's home.

110. Frazer & Friedli, *supra* note 5, at 7.

111. LeBaron & Senbel, *supra* note 2 at 38 (citing Rolston's study of the role of Northern Irish murals in Bill Rolston, *"Trying to Reach the Future Through the Past": Murals and Memory in Northern Ireland*, 6 CRIME, MEDIA, CULTURE, no. 3, 2010, at 285.

112. *Id.* at 33-37.

Legally, perceiving the use of PA systems to the Fajar call as simply a noise hazard may yield only two possible solutions—an amendment to the current proposed legislation or stricter enforcement of the Abatement of Environmental Nuisances Law currently in place. Both options proved futile—whether undercut by lack of enforcement or by shelving the proposed legislation year after year,[113] even if for good cause. This is not merely a material or even a relational dispute. Accordingly, a legal resolution will not put it to rest; indeed, it might escalate it even further. Nevertheless, the Muezzin Law conflict manifested itself in a legal context. At this point, addressing only its symbolic level might leave a vital aspect of it neglected. We propose, therefore, that identifying a conflict as a CRD holds jurisprudential ramifications.

Analyzing legal ramifications of CRDs requires additional research. Religious freedoms and practices enjoy a unique status and constitutional protection in most legal systems. In the United States, they are explicitly protected under the religion clauses of the First Amendment to the Constitution.[114] In Israel, they are not explicitly protected under Basic Laws (which are supreme constitutional legal norms).[115] However, the Israeli High Court of Justice has ruled on multiple occasions that the general right to human dignity protected under Section 2 of Basic Law: Human Dignity and Liberty[116] includes, *inter alia*, freedom of religion and conscience.[117] Therefore, we stress that our analysis of the Muezzin Law conflict as a CRD has legal consequences. Such consequences deserve more thorough study which we plan in the near future, to examine the consequences of extending CRD theory into the legal realm.

CONCLUSION

The important role that religion plays in millions of individuals' and communities' lives makes it a key element in many disputes. By failing to identify and properly address such disputes, we heighten the odds that they

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113. *Supra* notes 35-42 and accompanying text.
114. U.S. CONST. amend. I.
115. Dalia Dorner, *Does Israel Have a Constitution*, 43 ST. LOUIS U. L.J. 1325 (1999).
116. Basic Law: Human Dignity and Liberty, SH 1391 (Isr.).
117. *See e.g.,* HCJ 5016/96 Horev v. Minister of Transportation 51(4) PD 1 (1997) (Isr.); HCJ 5394/92, Huppert v. Yad Vashem, 48(3) PD 353 (1992) (Isr.).

may become intractable conflicts sowing harm, distress, suffering and violence. The inherent role of religion in shaping identities threatens to magnify such issues beyond the scope of original disputes, with far-reaching societal effects. Recognizing CRDs and their implications for dispute process design is critical, and the CRD theory presented here offers the means for doing so.

In this article, we've applied these tools to the Muezzin Law conflict, which was originally framed as an environmental legislative initiative to limit noise hazards. By identifying conflict over the proposed amendment to the Israeli Abatement of Environmental Nuisances Law to restrict the use of PA systems in mosques as a CRD, we've shown how religion plays a central part in these issues. Only when the true nature of the dispute is acknowledged can appropriate intervention be designed. Such intervention should not only address material and relational aspect of this conflict but must also be attuned to, and conscious of, the symbolic domain.

Merely understanding the need for use of symbolic tools, such as narratives and rituals, is not sufficient in and of itself. Working at the level of symbols, metaphors, and narratives requires an additional layer of analysis. In this article we've elaborated CRD theory by adding three complimentary factors to consider: the intensity of the conflict, the duration of the conflict, and the proximity of the issues to a religion's core values. By identifying and mapping these elements in each CRD, a more thoughtful and thorough portrayal can be generated and utilized for more accurate and targeted resolution process design.

By applying this elaboration of CRD theory to the Muezzin Law conflict, we have highlighted its unique characteristics. This revealed the insufficiencies of seeking to address the conflict through legislative action without regard for the religious implications. The conflict's dynamics of intensity, duration, and proximity to Islam's core values have exposed the need for a deeper type of engagement which harnesses context-specific symbolic tools. Without such attention, neither legislative reform nor political circumvention of the problem can resolve the conflict; dangerous escalation may become a prominent threat to the parties involved.

We've acknowledged that further study is required to expand understandings of CRD theories in the jurisprudential realm. Identifying a conflict as a CRD may hold legal ramifications beyond those we've identified in this article. A holistic approach to such conflicts involving

CRD identification, analysis, and theory may result in better design of dispute resolution systems and intervention tools. In a world replete with violent reactions to religious differences, this holistic approach offers hope for progress.