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When Do Religious Minorities' Grievances Lead to Peaceful or Violent Protest? Evidence from Canada's Jewish and Muslim Communities

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When Do Religious Minorities’ Grievances Lead to Peaceful or Violent Protest? Evidence from Canada’s Jewish and Muslim Communities

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When Do Religious Minorities’ Grievances Lead to Peaceful or Violent Protest? 
Evidence from Canada’s Jewish and Muslim Communities

Abstract

Previous research has shown that minority grievances can contribute significantly to violent conflict. However, it appears that grievances do not inevitably induce religious and other minorities to engage in protest or rebellion. Moreover, relative deprivation may explain conflict but not necessarily violent conflict. Contributing to research on these questions, this paper explores the conditions under which the grievances of religious minorities lead to non-violent or violent protest. Using a motive-opportunity framework, we assume that members of religious minorities who feel discriminated against must be willing and able to engage in peaceful and violent forms of protest – and that certain conditions are required for grievances to result in peaceful or violent dissent. We test this proposition by comparing the Jewish and Muslim communities in Canada. Our findings indicate that relative economic and political deprivation may create concrete grievances that in combination with origin-based value incompatibilities can explain differences in behaviour in reaction to these grievances.

Keywords: grievances, discrimination, religious minorities, peaceful protest, violent resistance

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1 Introduction

In recent years, scholarship on domestic conflict has granted increasing attention to the role of religion. Many violent conflicts have religious overtones, and previous research suggests that religious discrimination against minorities can significantly contribute to the outbreak of violent conflict, including civil war (Akbaba and Taydas 2011; Fox 2002, 2004; Gurr 1993, 2000). However, although these studies have found that religious discrimination increases the likelihood of grievances, it appears that discrimination and grievances do not inevitably induce religious minorities to engage in protest or rebellion (Akbaba and Taydas 2011; Basedau
This finding is striking as it indicates that a huge majority of – sometimes heavily discriminated against – religious minorities have remained inactive and peaceful despite holding substantial grievances. This challenges the conventional wisdom derived from the theory of relative deprivation. Moreover, deprivation may explain conflict but not necessarily the use of violence. Several other factors apparently also determine whether religious minorities decide to rise against the state, as the source of the discrimination, by engaging in peaceful or even violent collective action.

This study hence seeks to explore the conditions under which grievances lead to non-violent or violent political collective action by religious minorities. In doing so, it conducts a paired comparison of the Jewish and Muslim communities in Canada for the years 2000 to 2014. Although both religious minorities hold numerous grievances, Canada’s Jews have remained peaceful and have solely participated in non-violent forms of protest, while some Canadian Muslims have at times, in addition to peaceful protests, resorted to the use of violence. Using a motive-opportunity framework to explain collective action by religious minorities, we assume that members of religious minorities who feel they are subjectively discriminated against must be willing and able to engage in peaceful or violent forms of protest. We seek to identify those differences with respect to the motive and opportunity structure between both groups that may explain their divergent behaviour in response to their grievances.

The comparison contributes to the literature in several ways. First, it is arguably one of the first scholarly efforts that seeks to systematically investigate the determining factors of collective action on the part of particular religious minorities holding grievances. Second, it demonstrates that a theoretical framework of motive and opportunity is well suited to studying this topic. Third and finally, it identifies a number of particular variables that may explain religious minorities’ choice to engage in violent mobilisation in reaction to what they feel is discrimination or other forms of marginalisation. Although our comparative case study investigates contentious politics below the threshold of an outright armed conflict or civil war, the effects and mechanisms certainly also account for more severe organised violence.

The paper proceeds as follows. We first review the relevant literature on the topic. We then introduce the theoretical framework, which is based on the assumption that conflict mobilisation on the part of religious minorities requires both motive and opportunity, and that the use of violence is dependent on particular conditions. In the subsequent section, we apply the motive-opportunity framework to the Jewish and Muslim communities in Canada and systematically compare both groups with respect to non-violent and violent collective action. We conclude the paper by converting the empirical findings into hypotheses that can be put to the test in future research.

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1 Research for this paper was conducted within the framework of the “Religious minorities: discrimination, grievances and conflict” research project, which was funded by the German Israeli Foundation (GIF). The authors would like to thank Tom Konzack for his excellent research assistance in gathering and coding the data. We are also indebted to Jonathan Fox and other colleagues for providing valuable comments.
2 Literature Review

Two strands of literature are relevant to the topic of this study. This section first summarises the findings on the onset of violent and non-violent conflict, then moves on to the scholarly literature dealing with the relationship between (subjective) discrimination against (religious) minority groups and conflict mobilisation.

2.1 Violent and Non-Violent Forms of Conflict

Until recently, scholars exploring the emergence of violent and non-violent collective action have not engaged in dialogue with each other. For the most part, researchers interested in violent protest, including armed conflict (e.g. Collier and Hoefler 1998, 2004; Fearon and Laitin 2003; Hegre and Sambanis 2006; Kalyvas 2006), and those investigating non-violent collective protest (e.g. Della Porta and Diani 2006; McAdam et al. 1996; McCarthy and Zald 1977; Schock 1999; Sharp 1973) have developed separate theoretical frameworks (see Tilly 1978; Tilly and Tarrow 2007). This separation has started to disappear only with the recent publication of global and regional data sets that systematically capture peaceful collective action and now enable researchers to rigorously compare the specific drivers behind the onset of violent and non-violent conflict (Chenoweth and Lewis 2013; Salehyan et al. 2012).

With the growing integration of these two research strands, multiple empirical studies have demonstrated that the determining factors of violent and non-violent mobilisation differ considerably (Chenoweth and Lewis 2013; Cunningham 2013; Regan and Norton 2005). According to Chenoweth and Ulfelder, non-violent resistance is generally more difficult to predict than more violent forms of collective action. They conclude that peaceful mobilisation might be driven more by leaders’ agency and determination to overcome adverse circumstances than by structural factors (Chenoweth and Ulfelder 2017). White and colleagues also point to the importance of a group’s claims and tactical choices evolving into violent and non-violent mobilisation (White et al. 2015). Empirical results indicate that several clusters of variables have divergent impacts on the emergence of violent and non-violent insurgencies. Intra-group factors, which describe the characteristics of a given group, such as group size, degree of fragmentation and concentration, group location, and previous history of mobilisation, appear to play a significant role (Braithwate et al. 2015; Cunningham 2013; Gleditsch and Rivera 2017; Raleigh 2014). For instance, group size and internal fragmentation increase the risk of armed conflict but not the likelihood of non-violent protests, while a history of peaceful mobilisation increases the probability of continued or resumed peaceful campaigns. Inter-group factors include relations between groups and with the state, including interaction with competing groups, economic and political discrimination, and state-led repression. Recent scholarly studies have shown that these factors also significantly influence the onset of non-violent and violent collective action (Cunningham 2013; Pierskalla 2010; Raleigh 2014; Regan and Norton 2005; Shellman et al. 2013). Political exclusion, for example, tends to increase the likelihood of both forms of collective protest, but studies are somewhat divided over
the significance of the effect (Cunningham 2013; Regan and Norton 2005). Government-level factors such as the state’s regime type and the stability of governance structures also seem to shape the type of collective protest chosen (Cunningham 2013; Chenoweth and Ulfelder 2017; Fearon and Laitin 2003). Democracy, for instance, only appears to impact the emergence of non-violent conflict, making it less likely, but does not seem to have a significant effect on armed conflict. Lastly, contextual factors such as terrain, population density, or time trends have been shown to affect the onset of certain forms of conflict (Chenoweth and Ulfelder 2017; Hegre and Sambanis 2006). For instance, variables such as rough terrain, oil exports, and ethnic and religious fractionalisation appear to increase the likelihood of violent conflict but have no significant effect on peaceful collective action.

2.2 Minority Discrimination and Conflict Mobilisation

The classical theory of relative deprivation has argued that discrimination against minorities can significantly contribute to the outbreak of violent conflict (Gurr 1993, 2000). However, to date, scholars investigating the nexus between discrimination, collective grievances, and (violent) conflict have predominantly focused on ethnic conflict and thus confined their studies to ethnic minorities, while neglecting religious minorities as the unit of analysis (e.g. Cederman et al. 2010; Fox 2004; Gurr 1993, 2000; Gurr and Moore 1997; Wimmer et al. 2009; Wucherpfennig et al. 2012). Only a few recent empirical studies have paid more attention to religious minorities (e.g. Basedau et al. 2015; Fox 2013; Fox et al. 2017). Although ethnic and religious minorities sometimes overlap, they are not identical. As Basedau and colleagues (2015) point out, an ethnic minority can belong to the same religion as the majority in a state (as is the case for the Basques in France and Spain) and a group can be a religious minority without being considered an ethnic minority (as is the case for Mormons in the United States).

Studies that examine the influence of religious discrimination and grievances on ethnic conflicts have found a strong link between religious discrimination and grievances (Akbaba and Taydas 2011; Fox 1997, 2002, 2004; Gurr 1993, 2000), but the empirical results for the link between grievances and conflict are mixed. Fox found that religious grievances do not contribute to the emergence of political protests and that these grievances are linked to rebellion only when mediated by demands for autonomy (Fox 1997, 2002, 2004). Empirical findings from Akbaba and Taydas, on the contrary, indicate that religious grievances decrease the likelihood of peaceful protest while making violent political mobilisation more likely (Akbaba and Taydas 2011).

Researchers interested in domestic conflict have been giving increasing attention to the role of religion. Although religious actors can cause or participate in domestic conflicts, previous studies on religious conflicts have exclusively used the state as the unit of analysis. Scholars have concentrated either on religious identity, by examining whether groups belonging to different religions are more violent or whether inter-religious conflicts are more
violent than intra-religious conflicts, or they have focused on religious diversity and measured the extent of religious diversity in a state. Most of these studies conclude that religious identity or diversity influence the intensity of conflict (de Soysa and Nordás 2007; Ellingsen 2005; Gartzke and Gleditsch 2006; Olzak 2011; Reynal-Querol 2002; Rummel 1997; Sambanis 2001; Toft; 2007; Vanhanen 1999), but there are some studies that disagree with this finding (Collier and Hoeffler 2002; Fearon and Laitin 2003; Lacina 2006; Pearce 2005; Sørli et al. 2005). Only a few researchers have gone beyond these two aspects and looked at the religious content of conflict. Svensson, Harding, and Toft account for whether participants in a conflict make religious demands and find that these demands make conflicts more intractable (Svensson 2007; Svensson and Harding 2011; Toft 2007).

Overall, no study exploring the causal link between religion and domestic conflict has examined the causes of conflict by looking closely at minorities’ motives and opportunities to engage in these conflicts. Nearly all previous studies have almost entirely confined their scholarly efforts to ethnic minorities by investigating ethnic violence and ethnic-based conflict at the country level. This study concentrates on religious minorities and employs the group level of analysis in order to analyse the peaceful and violent conflict mobilisation of Canada’s Jewish and Muslim communities.

3 Concept and Theory

Sound theory requires that the key terms be defined. We start with “grievance.” A grievance is the explicitly verbalised subjective feeling of being marginalised. Grievances can refer to several forms of deprivation or marginalisation. It is important to note that grievances are different from intentional discrimination and objective deprivation (though often closely related). This study looks at religious, political, and economic grievances.

Religious minorities that voice grievances can exhibit collective action in three principal forms: they can remain inactive, they can participate in non-violent resistance, or they can turn to violent forms of collective action. Each of these three options is informed by religious minorities’ motivations and opportunities to mobilise. In other words, members of religious minorities suffering from grievances must be willing and able to engage in collective action (see also Bara 2014; Collier and Hoeffler 2004).

We must also specify what we understand by “group behaviour” or “collective action”: When analysing communities or groups we do not assume that they are homogenous actors. No identity group acts in a uniform manner (Gurr 1970). If we identify a certain behaviour, it means that a significant number of individuals from this particular group have behaved collectively in a particular way2 or that characteristics apply to group members on average.

2 In fact, in most cases, it will be apparent that only a minority of group members use violence.
Our dependent variable is collective action, which can include or exclude the use of physical violence for political purposes. Collective action can include not only peaceful protest, violent demonstrations, and riots, but also terrorist attacks, outright armed rebellion, and other political acts of violence. We have identified almost annual peaceful mobilisation activity on the part of both groups under study here (see Table A2 in the Appendix), but have found evidence of deadly violence, resulting in up to 13 fatalities, only within the Muslim community (see Table A3 in the Appendix).

The motive structure behind group behaviour can be divided into internal and external motives. The internal motive structure refers to religious minorities’ long-standing group characteristics, such as values and experiences from the past. Such conditions can be cultural norms in favour of or against the use of violence and long-standing political and economic participation or the lack thereof. Thus, the internal motive structure captures the extent to which group characteristics include or generate motives to engage in collective action. On the other hand, the external motive structure relates to outside stimuli such as marginalisation and threats or attacks against the particular religious minority and delineates the extent to which the environment stimulates motives to participate in collective action in a given situation (e.g. Akbaba and Taydas 2011; Cunningham 2013; Fox 1997, 2002, 2004; Pierskalla 2010). In sum, religious minorities’ motivation for conflict mobilisation is expected to result from the interaction of a religious group’s long-standing values and experiences as well as from situational outside stimuli.

Similarly to the motives to engage in collective action, religious minorities’ opportunities to mobilise can be classified into internal and external opportunities. The internal opportunity structure corresponds to the group’s capacity, which includes intra-group factors such as group size and organisational resources. Internal opportunity thus defines the extent to which the capacity of the respective religious minority allows for collective action. Such intra-group factors can be regional concentration and group size (Braithwate et al. 2015; Cunningham 2013; Gleditsch and Rivera 2017; Raleigh 2014). The external opportunity structure, in contrast, describes the extent to which the environment allows religious groups to mobilise and includes contextual factors such as the openness of the political system and the government’s (constraining) reaction to acts of collective action. Studies have indicated that government-level factors such as a state’s regime type may be of high importance by influencing minorities’ decisions to engage in collective mobilisation (Cunningham 2013; Chenoweth and Ulfelder 2017; Fearon and Laitin 2003). The interaction of internal capacity and outside opportunity results in the overall capability of the group to engage in collective action.

We generally assume that the presence of a motive is a prerequisite for religious minorities’ mobilisation and – although we do not rule out the possibility that the degree of discrimination matters – that it is mainly the organisational resources available to the particular religious minority that determine the form of collective action. Collective action can be absent or take various forms according to the interplay of this four-fold structure (see Figure 1 below).
Figure 1. Internal and External Motive-Opportunity Structure

4 Data and Methodology

We engage in a paired comparison of two minority groups that employs data gathered within the scope of the research project “Religious minorities: discrimination, grievances and conflict,” a collaboration between the Bar-Ilan University in Ramat Gan, Israel, and the GIGA German Institute of Global and Area Studies in Hamburg, Germany. This research project collected data on more than 750 religious minorities in some 180 countries worldwide for the period 2000–2014 and seeks to investigate whether discrimination or other differences in status lead to grievances and then to peaceful or violent mobilisation.

The data set relies predominantly on the International Religious Freedom Reports, which are published annually by the U.S. Department of State and describe the status of religious freedom in every country worldwide. Moreover, the research project employs data from other sources such as the Global Terrorism Database (GTD) and the Religion and State Project (RAS). It also includes information from various research and newspaper articles.3 The data set is particularly suitable for the purpose of this study as it includes information on discrimination against religious minorities, their grievances and political actions (non-violent and violent), and some group characteristics of each minority.4

3 We are aware of the fact that these sources include some limitations, such as the underreporting of events and biases in the reporting. However, other data projects have made the case that our main source, the International Religious Freedom Reports, are a valid source (Vüllers et al. 2015).
4 In addition to the quantitative data set, qualitative data on the respective religious minorities were also gathered.
Canada’s Jews and Muslims were selected as the object of investigation for several reasons. First, although both religious minorities hold numerous grievances, they differ significantly with respect to their reaction and collective action. While Canada’s Jews have remained peaceful and have participated solely in non-violent forms of protest, some of Canada’s Muslims have at times, in addition to peaceful protests, resorted to the use of violence (see above). This significant disparity allows us to investigate whether differences with respect to the motive and opportunity structures between the two groups may explain their divergent reactions to their grievances.

Second, analysing two religious minorities in one country enables researchers to hold certain conditions constant that might otherwise explain the disparity in political action. This is in line with a most-similar-systems research design, which comes close to a natural experiment (see Przeworski and Teune 1970; Sartori 1991). Third, though we selected Canada for practical reasons, it is also a useful case to study: Canada is not a hotbed of religious conflict, but it did exhibit some tensions between religious groups in the period under investigation. The absence of full-scale civil war allows for a more fine-grained analysis of contention, which often precedes armed conflicts. Also, as a Western democracy Canada represents a “hard case”; we would not expect so much violence because the classical drivers of conflict (e.g. low income, weak state, lack of democracy) are absent. This allows for a more group-centred analysis of specific group characteristics that have been neglected in the study of armed conflict, mostly because pertinent information on the groups is less readily available from classical data sets.

This study employs elements of process tracing. Process tracing is particularly suitable for case study research design as it enables researchers to test and develop theories by making within-country inferences about the presence and absence of causal mechanisms in single case studies, whereas most other small-n methods attempt to make cross-country inferences about causal effects (Beach and Pedersen 2013: 4). Since previous scholarly efforts have produced hardly any hypotheses regarding the collective mobilisation of aggrieved religious minorities, this study proceeds rather inductively by using theory-building process tracing. Theory-building process tracing aims to generate a theoretical explanation for a specific outcome, and thus to detect a systematic and relatively simple causal mechanism between one or several independent variables and the outcome of the dependent variable, which may be generalised across a wider population of cases (Beach and Pedersen 2013: 11, 60). These newly theorised relationships can then be tested by using either large-n methods or small-n methods such as theory-testing process tracing.

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5 However, this comes at the cost of not being able to assess the effects of those constant conditions in Canada.
5 Analysing and Comparing Canadian Jews and Muslims with Respect to Their Motive and Opportunity Structures

In this section, we apply the motive-opportunity framework developed in the theoretical part of this paper to the Jewish and Muslim communities in Canada. By analysing and comparing their motive and opportunity structures, we explore whether differences with respect to both groups’ motivations and opportunities may explain their divergent behavioural reactions to the grievances they hold.

5.1 Internal Motive Structure

As outlined above, internal motives refer to religious minorities’ long-standing values and experiences from the past and capture the extent to which group characteristics generate motives to engage in collective action. One of the driving factors for the mobilisation of religious minorities may be their previous level of political representation. Since the 1960s, Canadian Jews have been regularly included in the political decision-making process via the holding of diverse ministerial posts. Due to this long history of political representation, it is likely that Canada’s Jews are satisfied with their level of political power and thus have little incentive to mobilise collectively in this regard. Canada’s Muslim community, on the contrary, had no real history of political representation and was clearly underrepresented in the political process until recently (Selby 2016). In addition to this general political underrepresentation, Muslim politicians were members of parliament but not part of the cabinet during the period under investigation. Although we could not find any indication that Muslims held grievances because of this lack of representation, it may have reinforced their subjective feeling of marginalisation and relative deprivation and thus may have provided an incentive to engage in violent or non-violent forms of collective action (Cunningham 2013: 296).

Other crucial factors that may induce religious minorities to participate in collective action are the individual group members’ ethnicities and values. Although Canada’s Jewish community consists mainly of individuals with roots in the former Soviet Union countries, Israel, South Africa, and Morocco, only 25 to 30 per cent of them are foreign-born (American Jewish Yearbook 2006; Weinfeld 2008). More importantly, the Jewish community largely arrived and established institutional roots in Canada before the Second World War (Cohen 2016; Goldberg 2010). Due to their long history in Canadian society, Canada’s Jews are well

6 For instance, Herb Gray served as a Member of Parliament for four decades. He entered Parliament in 1962 and was the first Jewish cabinet minister at the federal level. Moreover, he served as deputy prime minister from 1997 to 2002 (American Jewish Yearbook 2003).

7 During the period under investigation, there were several Muslim Members of Parliament – e.g. Rahim Jaffer; Wajid Khan; and Yasmin Ratansi, the first Muslim woman elected to the Canadian House of Commons (Selby 2016). Moreover, there were two female Muslims – Mobina Jaffer and Salma Ataullahjan – appointed to the Canadian Senate during the period under investigation (Senate of Canada 2018). However, Canadian Muslims apparently did not hold any executive positions in the cabinet during the period under investigation.
integrated and have almost fully adopted the “liberal values” of Canadian society. In addition, one could assume that the Jewish culture, by and large, is relatively close to the values prevalent in Canadian society. If we take these two aspects together, it is reasonable to think that there are not any (or not many) value-based incompatibilities which may increase their grievances.

In contrast, over 70 per cent of Canada’s Muslims are foreign-born (mostly from Pakistan, Iran, India, and North Africa) and more than half of these foreign-born Muslims have arrived in Canada since 2000 (Neuman 2016). Hence, the Muslim community, on average, may have relatively more incompatibilities with dominant Canadian values, since its members simply arrived later and are still in the process of adjustment and integration. This divergence between the values adopted in the country of origin and the immanent values in Canadian society may increase the likelihood of conflict and dissent and thus enhance Muslims’ willingness to engage in collective dissident action. This may also include a greater likelihood of engaging in violent action. Some of the fatalities caused by Muslims include honour killings, which testify that value-based incompatibilities indeed exist. In addition, one may argue that being ready to kill members of one’s own group also increases the likelihood that one would kill members of (religious) out-groups, as there appears to be, in general, a greater readiness to use violence (sometimes in connection to religion).8 This could especially be the case when terrorist and other violent tactics are used in the countries of origin. We may call this phenomenon “imported radicalization” (e.g. Heghammer 2013).

The average socio-economic status of group members is also expected to be a critical factor that may induce religious minorities to participate in collective action (Cunningham 2013: 296). Canadian Jews are, on average, better educated and wealthier than the average Canadian (Seljak 2016). Thus, it appears that they have no real incentive to mobilise as their individual economic situation is favourable compared to that of the general population. On the contrary, Muslims in Canada experience higher rates of unemployment and have among the lowest individual income levels despite also being better educated, on average, than Canadian-born citizens (Neuman 2016; Seljak 2016). It is hence reasonable to assume that Canadian Muslims have a stronger incentive to engage in collective action in order to voice their dissatisfaction – and this dissatisfaction may make the use of violence more likely. It remains open at this point, however, whether the readiness to use violence is due to stronger grievances regarding marginalisation or value-based incompatibilities.

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8 We are grateful to Jonathan Fox for raising this point at a workshop.
Table 1. Internal Motive Structure: To What Extent Do Group Characteristics Include or Generate Motives to Engage in Collective Action?

<table>
<thead>
<tr>
<th></th>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Level of political representation</strong></td>
<td>Long history of political representation (since the 1960s)</td>
<td>No real history of political representation⁹</td>
</tr>
<tr>
<td></td>
<td>→ Jews have also been regularly included in the</td>
<td>→ Muslims did not hold executive government positions</td>
</tr>
<tr>
<td></td>
<td>decision-making process via the holding of diverse</td>
<td>→ political underrepresentation in the executive</td>
</tr>
<tr>
<td></td>
<td>ministerial posts</td>
<td>branch may reinforce their subjective feeling of social</td>
</tr>
<tr>
<td></td>
<td>→ are satisfied with their level of political power</td>
<td>marginalisation and relative deprivation → strong</td>
</tr>
<tr>
<td></td>
<td>→ little incentive to mobilise collectively</td>
<td>incentive to engage in protest</td>
</tr>
<tr>
<td><strong>Values and group identity</strong></td>
<td>Largely arrived and established institutional roots in</td>
<td>70 per cent of Canada’s Muslims are foreign-born and</td>
</tr>
<tr>
<td></td>
<td>Canada before the Second World War and only 25 to</td>
<td>more than half of these foreign-born Muslims have</td>
</tr>
<tr>
<td></td>
<td>30 per cent are foreign-born</td>
<td>arrived in Canada since 2000 → in an early stage of</td>
</tr>
<tr>
<td></td>
<td>→ a well-integrated community that has almost fully</td>
<td>adjustment and integration</td>
</tr>
<tr>
<td></td>
<td>adopted the “liberal values” of Canadian society</td>
<td>→ divergence between the values adopted in the country</td>
</tr>
<tr>
<td></td>
<td>→ no value-based incompatibilities</td>
<td>of origin and immanent values in Canadian society</td>
</tr>
<tr>
<td><strong>Ethnicity</strong></td>
<td>mainly from former Soviet Union countries, Israel, South Africa, Morocco</td>
<td>→ substantial value-based incompatibilities sometimes</td>
</tr>
<tr>
<td></td>
<td></td>
<td>combined with “imported radicalisation”</td>
</tr>
<tr>
<td><strong>Socio-economic status</strong></td>
<td>Canadian Jews are, on average, wealthier and better</td>
<td>Muslims in Canada experience higher rates of unemployment and have among</td>
</tr>
<tr>
<td></td>
<td>educated than the average Canadian</td>
<td>the lowest individual</td>
</tr>
<tr>
<td></td>
<td>→ individual economic situation is very good</td>
<td>income levels despite also being better educated, on</td>
</tr>
<tr>
<td></td>
<td>→ no real incentive to mobilise</td>
<td>average, than Canadian-born citizens.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>→ probably dissatisfied with their individual</td>
</tr>
<tr>
<td></td>
<td></td>
<td>economic situation</td>
</tr>
<tr>
<td></td>
<td></td>
<td>→ probably strong incentive to engage in protest</td>
</tr>
</tbody>
</table>

5.2 *External Motive Structure*

The external motive structure relates to outside stimuli such as marginalisation and threats or attacks against religious minorities and thus delineates the extent to which the environment stimulates motives to participate in collective action. The underlying assumption is that the degree and type of discrimination the religious minority experiences should affect motivation (Cunningham 2013: 296). Canada’s Muslims hold more distinct and more intense grievances compared to Canada’s Jews since potentially discriminatory provisions and actions appear to directly affect the daily life of Canadian Muslims. During the period under investigation the Muslim community expressed multiple political grievances including complaints about the banning of veils in courtrooms, Islamophobia, and even direct assaults against Muslims.¹⁰ Moreover, numerous religious grievances were reported, with Canada’s

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⁹ During the period under investigation.

¹⁰ Our data set (see Table A3 in the Appendix) lists various examples of Islamophobia. Please note that the most drastic expression of Islamophobia, the killings of six congregants in a mosque in Quebec City in January 2017, occurred outside the period under investigation (Shihipar 2017).
Muslims complaining about non-existent prayer spaces for students; the barring of Muslim girls from sports due to a ban on head coverings; and cartoons, movies, and newspaper articles that allegedly had an anti-Islamic message or were incompatible with Islam (International Religious Freedom Reports 2000–2014). Further to this, some cases of workplace discrimination were noted. On the other hand, Canadian Jews hold grievances that are more abstract and do not really affect their daily life. Political grievances mainly centred on the Middle East conflict (Canada’s voting behaviour in the UN Security Council, its general position towards the conflict, biased media coverage) and included complaints about increasing anti-Semitism and anti-Israel activity in Canadian society (International Religious Freedom Reports 2000–2014).

There were few religious grievances, and these predominantly involved a strong opposition to the legalisation of same-sex marriages. In contrast to Canada’s Muslims, general workplace discrimination does not seem to be an issue among Canadian Jews since only one incident was reported, in which a Jewish reserve lieutenant expressed economic grievances (see Table 2 and Table A3 in the Appendix). In sum, the Muslim community in Canada appears to face much more intense outside stimuli, which result in very concrete grievances, while the Jewish community only holds abstract grievances. Therefore, one may presume that Canada’s Muslims have a much greater incentive to engage in collective action than the members of Canada’s Jewish community.

Table 2. External Motive Structure: To What Extent Does the Environment Generate Motives to Engage in Collective Action?

<table>
<thead>
<tr>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Political grievances</strong></td>
<td></td>
</tr>
<tr>
<td>Mainly about the Middle East conflict (Canada’s voting behaviour in the UN Security Council, its general position towards the conflict, biased media coverage), as well as about increasing anti-Semitism and anti-Israel activity in Canadian society</td>
<td>Included the banning of veils in courtrooms, Islamophobia, and physical assaults against Muslims</td>
</tr>
<tr>
<td><strong>Religious grievances</strong></td>
<td></td>
</tr>
<tr>
<td>Predominantly involved strong opposition to the legalisation of same-sex marriages → no grievances regarding religious practice</td>
<td>Complained about non-existent prayer spaces for students and the barring of Muslim girls from sports due to a ban on head coverings. Moreover, cartoons, movies and newspaper articles that allegedly had an anti-Islam message or were incompatible with Islam were criticised.</td>
</tr>
<tr>
<td><strong>Economic grievances</strong></td>
<td></td>
</tr>
<tr>
<td>Only one incident was reported in which a Jewish reserve lieutenant had sued after being barred from an important assignment because he was Jewish → no reports on general workplace discrimination</td>
<td>Some cases of workplace discrimination were noted. These cases mainly centred on dress code disputes.</td>
</tr>
</tbody>
</table>
5.3 **Internal Opportunity Structure**

The internal opportunity structure relates to the group’s capacity and includes intra-group factors such as group size and organisational resources. It thus defines the extent to which the capacity of the respective religious minority allows for collective action. One of these factors is the geographic concentration of the religious group. Regional concentration should facilitate mobilisation, since coordination and thus mass participation is more easily achievable when group members live close together (Cunningham 2013: 295). Both Jews and Muslims in Canada are regionally concentrated in the metropolitan areas, especially in Toronto, Montreal, and Vancouver (Beyer 2006; Neuman 2016). Therefore, both groups should be equally capable of engaging in collective action.

Moreover, it may be important whether a religious minority has one or several active organisations that engage politically to promote the rights of group members. These organisations are crucial as they function as vehicles for organising and channelling minority group grievances into collective action. Both the Jewish and the Muslim communities in Canada have several political organisations that represent the interests of their community members at the societal level (albeit with different levels of actual representation in high-level government positions).11 Although there is some competition among these individual organisations, which can either undermine or enhance religious groups’ mobilisation, it is expected that these tight networks of organisations should foster mobilisation and thus make collective action more likely.12

Another critical factor that may facilitate mobilisation is certainly the financial resources available to the religious minorities and, accordingly, their political organisations. Jewish and Muslim organisations alike are predominantly funded by private donors, but the exact amount of available funds is unknown. However, while Canada’s Jewish community apparently does not receive any funding from abroad, some Muslim organisations in Canada receive external funding from the Saudi government (Freeze and Chowdhry 2015; Jimenez and El Akkad 2015). It remains unclear, however, whether this is a convincing reason to assume that Canada’s Muslims are more capable of engaging in collective action. The outside support for Muslim organisations could be levelled out by the larger domestic resources of Jewish organisations.

The size of a religious minority relative to the overall state population may also play a role in the level of collective action. Larger groups are probably more able to achieve their goals through conventional politics and peaceful forms of collective action because they are

---

11 Among the Jewish organisations active in Canada are the Canadian Jewish Congress, the Canada-Israel Committee, and the Canadian Council for Israel and Jewish Advocacy (Bones 1985; Cohen 2016; Goldberg 2010). Canada’s Muslim organisations include, among others, the Canadian Islamic Congress, the National Council of Canadian Muslims, and the Canadian Muslim Union (Canadian Muslim Union 2016; National Council of Canadian Muslims 2016; Selby 2016).

12 One may also argue that competition between different organisations will increase the likelihood of competition in outbidding processes (e.g. Toft 2007).
better able to pressure the ruling elite (Cunningham 2013: 295). While Canada’s Jewish community has approximately 350,000 members, representing 1 per cent of the total population (Minority Rights Group International 2016), Muslims are the largest minority group in Canada. The one million Muslims represent 3.2 per cent of the total population (Statistics Canada 2016). According to this reasoning, Canada’s Muslims should be less likely to engage in violent forms of protest since, due to their mere size, they should be able to achieve their goals politically or peacefully – at least compared to the smaller (and more peaceful) Jewish community.

### Table 3. Internal Opportunity Structure: To What Extent Does the Capacity of the Group Itself Allow for Collective Action?

<table>
<thead>
<tr>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Geographic concentration</strong></td>
<td><strong>Geographic concentration</strong></td>
</tr>
<tr>
<td>Canada’s Jews are regionally concentrated in the Montreal and Toronto area.</td>
<td>Canada’s Muslims are regionally concentrated in the metropolitan areas, especially Toronto, Montreal, and Vancouver.</td>
</tr>
<tr>
<td>(\rightarrow) facilitates mass coordination and collective mobilisation</td>
<td>(\rightarrow) facilitates mass coordination and collective mobilisation</td>
</tr>
<tr>
<td><strong>Geographic concentration</strong></td>
<td><strong>Geographic concentration</strong></td>
</tr>
<tr>
<td>Several political organisations represent the interests of Canada’s Jewish community.</td>
<td>Several political organisations represent the interests of Canada’s Muslim community.</td>
</tr>
<tr>
<td>(\rightarrow) some competition between them</td>
<td>(\rightarrow) some tensions between them</td>
</tr>
<tr>
<td>(\rightarrow) tight network of organisations, which fosters mobilisation</td>
<td>(\rightarrow) tight network of organisations, which fosters mobilisation</td>
</tr>
<tr>
<td><strong>Available financial resources</strong></td>
<td><strong>Available financial resources</strong></td>
</tr>
<tr>
<td>Funds are raised through the Jewish Federation of Canada and private donors in Canada.</td>
<td>Mostly funded by private donations from Canadians.</td>
</tr>
<tr>
<td>(\rightarrow) receive no funding from the government of Canada or the state of Israel</td>
<td>(\rightarrow) some receive funding from government agencies (e.g. Canadian Council of Muslim Women)</td>
</tr>
<tr>
<td>(\rightarrow) Jewish organisations likely have more domestic resources overall</td>
<td>(\rightarrow) evidence that some Muslim organisations receive external funding from the Saudi government</td>
</tr>
<tr>
<td>(\rightarrow) exact amount of monetary resources unknown</td>
<td>(\rightarrow) exact amount of monetary resources unknown</td>
</tr>
<tr>
<td><strong>Relative size of the minority</strong></td>
<td><strong>Relative size of the minority</strong></td>
</tr>
<tr>
<td>350,000 Jews live in Canada, representing 1 per cent of the total population.</td>
<td>Over one million Muslims live in Canada, representing 3.2 per cent of the total population.</td>
</tr>
</tbody>
</table>

### 5.4 External Opportunity Structure

The external opportunity structure refers to conditions such as the openness of the political system and the government’s reaction to acts of collective action and thus describes the extent to which the environment enables religious groups to mobilise. Both Jews and Muslims in Canada appear to have the same external opportunities, since both religious minorities are embedded in the same context. Canada’s political system provides legal opportunities for protest and no reports of strict interventions by the Canadian government in reaction to the mobilisation of either religious group were found (Religious Freedom Reports 2000–2014).
As a result, the environment provides both minorities with equal opportunities to mobilise and it is not expected that differences in the external opportunity structures of the religious groups explain their divergent actions in response to their grievances.13

Table 4. External Opportunity Structure: To What Extent Does the Environment Allow for Collective Action?

<table>
<thead>
<tr>
<th></th>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Openness of the political system</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Canada’s political system provides legal opportunities for protest.</td>
<td>Canada’s political system provides legal opportunities for protest.</td>
<td></td>
</tr>
<tr>
<td><strong>Government’s reaction to mobilisation</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>No reports on strict interventions by the Canadian government in response to the organised rallies were found.</td>
<td>No reports on strict interventions by the Canadian government in response to the organised rallies were found.</td>
<td></td>
</tr>
</tbody>
</table>

6 Analysing the Driving Factors behind Peaceful and Violent Collective Mobilisation

Using our motive-opportunity framework, we now systematically explore the driving factors behind the peaceful and violent mobilisation of Canada’s Jewish and Muslim communities. What differences in the motive-opportunity structures explain the differences in collective action?

Whereas no unambiguous evidence was found that Canada’s Jews engaged in violent collective action during the period under investigation, multiple incidents of non-violent mobilisation were reported.14 Canada’s Jewish community predominantly engaged in peaceful forms of collective action in response to grievances about issues related to the Middle East conflict (Canada’s voting behaviour in the UN Security Council, its general position towards the conflict, and biased media coverage). Moreover, the Jewish community organised several demonstrations to protest against increasing anti-Semitism in Canadian society. These demonstrations took place several times in most years (see Table A1 in the Appendix). Hence, it appears that political grievances about issues related to the Middle East conflict and increasing anti-Semitism in Canadian society mainly triggered the peaceful mobilisation of Canada’s Jews. As argued above, these grievances and the external motive structure in general are rather abstract and comparatively mild and therefore less likely to induce Canada’s Jewish community to use violence.

13 Please note that external support – as in the case of the Muslim community – that directly goes to the groups is considered to be part of the group’s internal opportunity structure as it is a direct characteristic of the group rather than the environment.

14 In 2014, however, two incidents were reported in which it was unclear whether Canadian Jews participated in political violence. In these cases, the Jewish Defense League clashed twice with Palestinian groups. Only one injured person was reported (see Table A2 in the Appendix). Since it is unclear whether Jews used violence or if they were just attacked by the Palestinian groups, this study does not take these two incidents into account.
If we take a closer look at the internal motive structure, we see that the group characteristics also do not really include or generate motives to engage in violent collective action. Because they are, on average, better educated and wealthier compared to the general population, Canadian Jews’ individual economic situations are quite satisfactory (Seljak 2016). Moreover, Jews in Canada appear to be a well-integrated minority group and they have been actively included in the political process since the 1960s (American Jewish Yearbook 2001–2008). Thus, it can be argued that Jews in Canada are less inclined to use force since they are largely able to achieve their goals peacefully on the political level and have no incentive to put their high socio-economic status at risk.

Furthermore, due to its advanced integration status, Canada’s Jewish community does not exhibit any incompatibilities with the values prevalent in Canadian society, which largely condemn the use of violence. Canadian Jews apparently also have the opportunity to engage in non-violent forms of collective action. Because it is regionally concentrated in metropolitan areas and has several political organisations that represent its interests (Beyer 2006; Cohen 2016), the Jewish community can easily coordinate and engage in mass participation. Canada’s political system also provides legal opportunities for peaceful protest, and no reports of strict interventions by the Canadian government in reaction to the organised rallies were found for the period under investigation (Religious Freedom Reports 2000–2014). In sum, both the capacity of the Jewish community (internal opportunity structure) and its environment (external opportunity structure) enable Canadian Jews to mobilise peacefully.

In contrast to Canada’s Jewish community, Canada’s Muslims have sometimes, in addition to undertaking peaceful protests, resorted to the use of violence. Although Canadian Muslims, like their Jewish counterparts, participated in numerous peaceful demonstrations during the period under investigation (see Table A1 in the Appendix), multiple incidents of violent mobilisation were identified. These resulted in up to 13 fatalities (see Table A2 in the Appendix). However, the violent mobilisation of Canada’s Muslim community requires specification. After looking at each of these violent incidents separately, it is possible to categorise these cases into three types of violent action: terrorist attacks, anti-Semitic violence, and honour killings. Terrorist attacks conducted by Muslims targeted Canadian citizens and caused seven fatalities. Honour killings were directed against Muslims or, more precisely, against “deviators” from within the group, resulting in six fatalities. Whereas the terrorist attacks targeted the general population, the acts of anti-Semitic violence targeted another religious minority group – the Jewish community – and only caused minor injuries. The motivation behind these violent incidents may stem from the group’s internal and external motive structures.

15 It is debatable whether honour killings are a form of collective political action. One could argue that it is a private criminal action. However, frequently, these killings are resolved, planned, and executed by whole families. Yet, even if we exclude the deaths by honour killings the stark difference in the dependent variable persists.
16 The fatalities included three perpetrators and four victims.
If we take a closer look at the internal motive structure, we see that multiple group characteristics may induce Canadian Muslims to at times engage in violent forms of collective action. Canada’s Muslims have been clearly underrepresented in the political process (until recently), possibly due to the fact that the Muslim community largely arrived after 2000, and their individual economic situation is relatively unfavourable, despite the fact that they are, on average, better educated than the general population (Neuman 2016; Selby 2016). The lower economic status of Muslim individuals and political underrepresentation may in turn boost their willingness to engage in violent forms of collective action.

Another crucial aspect may be the dominant values and ethnicities of Canada’s Muslim community. Over 70 per cent of Canada’s Muslims are foreign-born – mostly from Pakistan, Iran, India, and North Africa – and more than half of these foreign-born Muslims have arrived in Canada since 2000 (Neuman 2016). Thus, it seems likely that Muslims have, on average, more substantial incompatibilities with the liberal values of Canadian society since they are in an early stage of adjustment and integration. This at least partial value incompatibility between the values adopted in the country of origin and the immanent values in Canadian society may increase the likelihood that some members of the community will engage in violent actions such as terrorist attacks (and honour killings).

Furthermore, the Muslim community’s environment appears to generate motives to participate in acts of political violence, or at least more drastic forms of reaction, given the existence of a multitude of distinct and comparatively intense grievances that appear to be directly relevant to the daily life of the Muslim community. These grievances, which are probably fostered or intensified by the value-based incompatibilities, may provide some incentive to resort to the use of force as they involve complaints about rather serious issues such as workplace discrimination or symbolically important issues such as non-existent prayer spaces and the exclusion from sports activity due to a ban on head coverings. This finding is in line with previous empirical research on domestic terrorism, which found that economic discrimination is a significant predictor of domestic terrorist events (Piazza 2011). The case of Muslims in Canada suggests that not only economic but also religious grievances may increase the likelihood that individuals decide to conduct terrorist attacks. Hence, to summarise, the motivation behind the violent mobilisation of some members of Canada’s Muslim community appears to result from their at least subjectively disappointing integration status, their value-based incompatibilities with liberal Canadian society, and outside stimuli in the form of intense grievances and “imported radicalisation” from the Middle East, where the Muslim community mainly originates from (see e.g. Heghammer 2013).

The capacity of the group itself, described above, also allows for violent collective action. In many organisational respects, the Muslim community is no different to the Jewish community, but it is particularly striking that some Muslim communities in Canada receive external funding from the Saudi government (Freeze and Chowdhry 2015; Jimenez and El Akkad 2015). This external funding may lead to extremist influences such as Wahhabism, which in
turn may foster the emergence of incompatibilities with the prevalent values in Canadian society and thus make violent action more likely to occur (Fife 2013).

7 Lessons Learned: Under What Conditions Do Grievances Lead to Non-Violent or Violent Protest by Religious Minorities?

Our application of the motive-opportunity framework to Canada’s Jewish and Muslim communities and our analysis of their peaceful and violent mobilisation have uncovered some factors that may explain why some religious minorities suffering from grievances tend to engage in violent forms of collective action, while others remain virtually peaceful.

One crucial factor seems to be the extent to which conditions generate motives for resorting to violence. The grievances of the Muslim community are more severe and affect community members’ daily lives, while the grievances of Canada’s Jewish community are comparatively abstract and weak. Hence, religious minorities with more distinct and intense grievances appear to be more likely to participate in political violence. Furthermore, specific group characteristics may represent critical factors in explaining the use of violence. Canada’s Jewish community has little incentive to participate in violent forms of collective action since its members have achieved a remarkable status in Canadian society, with a prominent level of political representation and high socio-economic status.

Canada’s Muslims, on the contrary, did not hold cabinet positions during the period under investigation and have, on average, a lower socio-economic status. Thus, political underrepresentation (at least in the executive branch) and relative economic deprivation appear to increase the likelihood that religious minorities will resort to violence, since they are less able to solve their numerous grievances by enforcing their demands and interests peacefully on the political level.

Furthermore, the Muslim community is at an early stage of immigration. This at least partially explains the lack of political representation and economic equality. In addition, the community finds itself in the process of adjustment and integration. Therefore, some group members may have some more serious value-based incompatibilities with liberal Canadian values. These may be fostered by the external funding that some Muslim organisations receive from the Saudi government, which clearly promotes a more conservative practice of Islam (Wahhabism). This “clash” between the values adopted in the country of origin and/or promoted through extremist influences and the immanent values in Canadian society may trigger religious minorities’ engagement in violent collective action such as terrorist attacks and honour killings.
In sum, the following variables are important for the violent mobilisation of religious minorities:

• More distinct and intense grievances
• Political underrepresentation in the executive branch
• Lower socio-economic status and the potential personal feelings of frustration associated with it
• Countries of origin with values and practices that are not completely compatible with the values prevalent in the host country
• A group’s position at an early stage of the integration process and its receipt of funding from foreign (radical) governments, which increase the likelihood of serious (and persistent) value-based incompatibilities

What lessons can be learned from the comparison of two religious communities in Canada for the general study of religious grievances and conflict? First, a theoretical motive-and-opportunity framework represents a useful way of systematically analysing the effects of subjective discrimination against religious and other groups. This comparative case study has identified a number of plausible explanations for differences in behaviour. We have no direct external validation of our results, but our findings can contribute to explaining why religious discrimination and grievances do not necessarily lead to violent conflict, as Basedau et al. (2015) and Fox et al. (2017) have shown. In terms of possible explanations, the above list of variables shows that it is different motive structures that account for the differences in violent and peaceful behaviour, but we would not have known this without studying opportunities. Second and relatedly, we should distinguish between the characteristics of the groups on the one hand and the characteristics of the environment on the other. Third, systematic comparative case studies may represent an additional tool for studying the effects of discrimination, grievances, and/or the reasons behind violent or non-violent protest. In particular, we can identify crucial variables in particular cases that have not been used in quantitative studies but can be put to the test in larger samples as to whether they represent general determinants of violence.

Finally, we should also point to some answers this study cannot give. Given that we have identified several critical variables – relative deprivation vs. origin-based value incompatibility – that may explain the differences in violent and peaceful mobilisation, we cannot determine whether one of these variables is more important or whether they work in conjunction. We should also concede that we cannot assess the role of those variables that are the same for Jews and Muslims in Canada, such as the liberal external opportunity structure. Given the paired comparison design, we simply cannot know. In both cases, only other comparative studies, looking at a small or large number of countries, can answer these questions.
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Christopher Huber and Matthias Basedau: Religious Minorities’ Grievances and Peaceful or Violent Protest


Strand, Håvard, Nils Petter Gleditsch, and Mirjam E. Sørli (2005), Why is There So Much Conflict in the Middle East?, in: Journal of Conflict Resolution, 49, 1, 141–165.


Appendix


<table>
<thead>
<tr>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>2000:</strong> “A number of rallies and conferences were held to put pressure on the Canadian government to reverse its tilt toward the Palestinians, and efforts were stepped up to communicate information about Israel’s situation to the general Canadian population” (American Jewish Yearbook 2001).</td>
<td><strong>2001:</strong> “The Canadian Association of Jews and Muslims rallied at Toronto’s city hall on September 15 in support of mutual respect, the sanctity of life, and coexistence” (American Jewish Yearbook 2002).</td>
</tr>
<tr>
<td><strong>2001:</strong> “Two rallies were held in Montreal to protest Palestinian terrorist attacks in Israel, the first in August, just after the Sbarro pizzeria bombing in Jerusalem, and the second in December, after large-scale terrorist bombings in Haifa and Jerusalem” (American Jewish Yearbook 2002).</td>
<td><strong>2004:</strong> “A major Islamic conference is expected to draw an estimated 12,000 to 15,000 Muslims to the SkyDome this weekend to hear various international speakers” (Freeze/Bhandari 2004).</td>
</tr>
<tr>
<td><strong>2002:</strong> “Several times during the year, Jews in various Canadian cities held rallies to express solidarity with Israel. Many were quite large, with several thousand participants” (American Jewish Yearbook 2003).</td>
<td><strong>2005:</strong> “On Sunday October 2, about 300 Toronto-area Muslims and supporters rallied at Queen’s Park demanding that Muslims have equal access to the Arbitration Act in Ontario and opposing Liberal Premier Dalton McGuinty’s decision to ban faith-based arbitration (Fidler 2005). In November, Jews joined Muslims, Sikhs, and Christians in a rally at Queen’s Park (the provincial government center in Toronto) to demand an equitable funding policy” (American Jewish Yearbook 2006).</td>
</tr>
<tr>
<td><strong>2003:</strong> “Over 100 Jewish students attended and protested the one-sided character of the presentations given by four panellists, which described Israel’s occupation as ‘fundamentally illegal’” (American Jewish Yearbook 2004).</td>
<td><strong>2006:</strong> “The 34-day war between Hezbollah and Israel, sparked protests across the country. Arab and Muslim organizations in Toronto generated their crowds of supporters and on occasion the Israelis also formed their own counter-rally” (Sheikh 2006).</td>
</tr>
<tr>
<td><strong>2004:</strong> “The events in Toronto aroused the Jewish community, which organized a rally in protest against anti-Semitism that drew some 3,000 people, including elected officials and leaders of several ethnic and religious groups” (American Jewish Yearbook 2005).</td>
<td><strong>2008:</strong> “Palestinian-Canadians and their supporters held protests in Toronto and several other Canadian cities to call for an end to the air strikes in the Gaza Strip, while some pro-Israel demonstrators made their voice” (CTV News 2008).</td>
</tr>
<tr>
<td><strong>2005:</strong> “Montreal Jews demonstrated in August against the Gaza disengagement” (American Jewish Yearbook 2006). “In November, Jews joined Muslims, Sikhs, and Christians in a rally at Queen’s Park (the provincial government center in Toronto) to demand an equitable funding policy” (American Jewish Yearbook 2006).</td>
<td><strong>2009:</strong> “In Toronto, more than 150 ethnic Pashtuns and their sympathizers organized a demonstration at the Queen’s Park in order to protest against the sharia law and for peace” (Goddard 2009). “About 50 Winnipegers gathered outside the Asper Jewish Community Centre in Winnipeg to call for an Israeli withdrawal from Gaza. The vigil was organized by Peace Alliance Winnipeg and the Winnipeg chapters of the Canada Palestine Support Network and Canadian Muslims for Palestine” (Peace Alliance Winnipeg News 2009).</td>
</tr>
<tr>
<td>Year</td>
<td>Canada’s Jews</td>
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<tr>
<td>------</td>
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</tr>
<tr>
<td>2006</td>
<td>“A rally under the name United Against Terrorism took place in June in Toronto, sponsored by multiple Jewish and non-Jewish groups” (American Jewish Yearbook 2007). “Efraim Zuroff of the Simon Wiesenthal Center came to Canada in June to draw attention to Operation Last Chance, a final effort to get governments to act. A rally was held on Parliament Hill in Ottawa to publicize the initiative” (American Jewish Yearbook 2007).</td>
</tr>
<tr>
<td>2008</td>
<td>“Palestinian-Canadians and their supporters held protests in Toronto and several other Canadian cities to call for an end to the air strikes in the Gaza Strip, while some pro-Israel demonstrators engaged in a counter-demonstration” (CTV News 2008). “Journalist and author Naomi Klein gave the keynote address at a meeting in Toronto over the last weekend of March of more than 100 Jews from across Canada dedicated to promoting a just peace in Israel/Palestine. She told those assembled that Israel has two main industries, tourism and security. It is trying, she said, to market itself as being able to provide normalcy for visitors while at the same time it promotes war, injustice, and oppression. [...] According to Diana Ralph, who serves as public spokesperson for the Alliance, the new group is needed to provide an alternative voice to that of the Canadian Jewish Congress (CJC)” (Amdur 2008).</td>
</tr>
<tr>
<td>2009</td>
<td>“Outside the Israeli Consulate in Toronto, police estimated about 2,000 people gathered in frigid weather to condemn the Israeli attacks, while a smaller group of pro-Israel demonstrators made their presence known behind a police barricade” (CBC News 2009). “Hours after Hamas agreed to a weeklong ceasefire, about 1,000 people draped in Israeli flags congregated at Yonge and Dundas Square for a pro-Israel rally this afternoon” (Doolittle 2009).</td>
</tr>
<tr>
<td>Year</td>
<td>Canada’s Jews</td>
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<tr>
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<tr>
<td>2011:</td>
<td>“About 100 protesters, many from groups such as the Jewish Defense League, the Christian Heritage Party, and Canadian Hindu Advocacy, came to the Toronto District School Board Monday evening to protest its approval of formal Friday prayer services for Muslim students at Valley Park Middle School” (Kalinowski 2011).</td>
</tr>
<tr>
<td>2013:</td>
<td>“After Elias Hazineh, the former president of Palestine House, called for the murder of Israelis, a counter-rally attended by about 70 Jewish Defense League members and supporters took place in Toronto” (Lungen 2013). “In response to the Parti Quebecois charter that has been blasted across Canada as xenophobic, discriminatory, and unconstitutional, kippah-clad Jews joined thousands of Muslims, Sikhs, and Christians in a protest march against the measure, which will be introduced to the Quebec legislature later this fall” (JTA 2013).</td>
</tr>
<tr>
<td>2014:</td>
<td>“Multiple pro-Israel rallies organized by Jewish organizations were held in several Canadian cities” (Shefa 2014). “More than 4,000 Jewish Torontonians, and a healthy contingent of Christians and other non-Jews, were led by Holocaust survivors in a march up the city’s largely Jewish Bathurst street on Wednesday. The August 20 event was launched in the face of a global resurgence of anti-Semitism cloaked in the guise of anti-Zionism, say organizers” (The Times of Israel 2014).</td>
</tr>
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<table>
<thead>
<tr>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
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<tr>
<td><strong>2014:</strong> “Jewish and Palestinian protesters clash in Mississauga. Police said the trouble started when members of the Jewish Defense League (JDL) of Canada began gathering outside the Palestine House. The JDL is a small, controversial group which has been criticized in the past by mainstream organizations such as the Canadian Jewish Congress. The group reportedly met with Palestinian protesters who were already in front of the building. One person was taken to hospital with minor injuries from the Mississauga protest. No arrests were made” (City News 2014). (Islamophobia?) “On Friday evening, hundreds gathered in front of City Hall in support of Palestinians who have been killed by Israeli fire in Gaza. However, a handful of Israeli supporters showed up, and an angry confrontation broke out that saw men begin shoving each other and screaming” (Elliott 2014). (Islamophobia)</td>
<td><strong>2001:</strong> “A man was arrested and charged with the double murder of Muslim students, a brother and a sister, in Canada. According to Peel Regional Police officials, the 23-year-old Mehaboobbhoy Adamjee, a resident of River Street in Toronto, has been charged with two counts of second degree murder. A young university student, Naeem Amiji, and his 23-year-old sister Nuzhat were killed in mysterious circumstances last week in a high-rise condominium building located at 325 Webb Drive, Mississauga, nearly 25 km west of Toronto” (Siddiqui 2001). 2 fatalities (Honour killings)</td>
</tr>
<tr>
<td><strong>2002:</strong> “On September 9, pro-Palestinian demonstrators in Montreal assaulted a number of Jews during a riot on the campus of Concordia University, where former Israeli prime minister Benjamin Netanyahu was scheduled to give a speech” (RFR 2003). “In April, Dr. Bernard Goldman, a physician, happened upon some 1,000 pro-Palestinian demonstrators marching to the Israeli Consulate in Toronto on Land Day. After denouncing suicide bombers to a protester, Goldman was shoved against a parked car and suffered a broken shoulder. Charges were brought against his Palestinian assailant” (AJYB 2003). (Anti-Semitism)</td>
<td></td>
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<td><strong>2005:</strong> “In January 2005, Sleiman El-Merhebi pleaded guilty to arson and uttering threats in connection with the firebombing of the United Talmud Torah elementary school in Montreal on 5 April 2004” (Goldberg 2010). (Anti-Semitism/Terrorism) “The 25-year-old, Moroccan-born Mohamed-Anas Bennis was shot by a Montreal police officer after allegedly leaving his neighborhood mosque in the early morning of 1 December 2005. The Montreal Police have claimed Bennis was carrying a kitchen knife and shot him in self-defense” (Selby 2016; CBC News 2011c). 1 fatality (Terrorism?)</td>
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<tr>
<td>Year</td>
<td>Description</td>
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<td>2006</td>
<td>“In February, the Algerian-born Omar Bulphred pleaded guilty to three counts of arson and two of making threats and was sentenced to a total of seven years in prison. His co-accused, Azim Ibragimov, was sentenced a year earlier to four years. The two men were arrested in April 2007 for a series of criminal acts in Montreal, including the firebombings of the Skver-Toldos Orthodox Boys School in September 2006 and the Ben Weider Jewish Community Center in April 2007” (Goldberg 2010). (Anti-Semitism/Terrorism)</td>
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</tbody>
</table>
| 2007 | “For years, Muhammad Parvez had been in absolute control of his family: he set the rules, he made the decisions, and he told his eight children, including the adult ones, exactly how to live their lives. But Aqsa Parvez, 16, the youngest in the family, dared to challenge her father’s rule. On the morning of December 10, 2007, Aqsa was murdered in the basement bedroom of her Mississauga home. She had been strangled by her assailant’s bare hands” (Mitchell/Javed 2010).  
→1 fatality (Honour killing)  
“In February 2009, the Algerian-born Omar Bulphred pleaded guilty to three counts of arson and two of making threats and was sentenced to a total of seven years in prison. His co-accused, Azim Ibragimov, was sentenced a year earlier to four years. The two men were arrested in April 2007 for a series of criminal acts in Montreal, including the firebombings of the Skver-Toldos Orthodox Boys School in September 2006 and the Ben Weider Jewish Community Center in April 2007” (Goldberg 2010). (Anti-Semitism/Terrorism) |
| 2008 | “Peer Khairi, an Afghan immigrant, is accused of murdering his culturally permissive wife to preserve the family’s Muslim honor. On March 18, 2008, he killed his wife at the peak of a heated argument. The Crown characterizes the slaying as an honor crime, alleging Mr. Khairi was driven by his growing frustration at his wife’s willingness to embrace Canadian values and to allow their children to do the same” (Euro-Islam 2012).  
→1 fatality (Honour killing)  
2009 | “A St. Léonard couple allegedly began making plans to kill their three daughters, along with the husband’s first wife, weeks before the bodies of all four victims were found in a car submerged in the Rideau Canal. Mohammad Shafia, his wife Tooba Mohammad Yahya, and their 18-year-old son Hamed Shafia, all face first-degree murder charges in the deaths” (The Montreal Gazette 2009).  
→4 fatalities (Honour killings) |
<table>
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<tr>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
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<tr>
<td><strong>2010:</strong> “A fourth person has been arrested in Ottawa as part of the investigation into the alleged Ottawa terrorism cell on Friday, the same day accused Khurram Sher appeared in court. They are accused of conspiring during the past two years to facilitate terrorist activity with three named people and unknown others in Canada, Iran, Pakistan, Afghanistan, and Dubai” (Gillis 2010). (Terrorism)</td>
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<td><strong>2013:</strong> “John Nuttall and Amanda Korody were found guilty of terror charges last year after they planted inert pressure cooker bombs on the steps of British Columbia’s provincial legislature in 2013, ahead of Canada Day celebrations that drew thousands of revellers to the area. The verdict was thrown out on Friday, after BC Supreme Court Justice Catherine Bruce said the RCMP had manipulated the two converts to Islam into carrying out the plot” (Kassam 2016). (Terrorism)</td>
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<td>*Three men were arrested in connection with a terrorist plot. All three face numerous terrorism charges in connection with an alleged plot to derail a New York–Toronto passenger train, including conspiring ‘with each other to murder unknown persons for the benefit of, or in association with a terrorist group.’ They were arrested on April 22” (Gillis 2013b). (Terrorism)</td>
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<td><strong>2014:</strong> “In Calgary, at the July 18 protest in front of City Hall, hundreds of pro-Palestinians rallied in support of Gazans. Judy Shapiro, executive director of the Calgary Jewish Federation, who attended the rally as an observer, said violence erupted when a group of less than 10 pro-Israel demonstrators stood at the edge of the growing Palestinian crowd waving Israeli flags. She said one person suffered a concussion, another was punched in the face, another suffered a broken nose, and a woman was punched in the stomach” (Shefa 2014). (Anti-Semitism)</td>
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<td>*Zehaf-Bibeau, who was 32, travelled to Ottawa in early October from Western Canada. On the morning of Oct. 22, he shot and killed Cpl. Nathan Cirillo at the National War Memorial, then rushed to Parliament Hill, where he was killed inside the Centre Block in a shootout with security” (Robertson 2015).</td>
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<td>-&gt;2 fatalities (Terrorism)</td>
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<tr>
<td>Canada’s Jews</td>
<td>Canada’s Muslims</td>
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<td>“The RCMP say they arrested Martin Couture-Rouleau, the driver in the fatal hit-and-run attack in St-Jean-sur-Richelieu, as he was about to leave the country last summer, but didn’t have evidence to charge him with any crime. Federal investigators had become concerned in June about the radicalization of Couture-Rouleau. His passport was seized at that time, but he was released because investigators didn’t have enough evidence to charge him. ‘We could not arrest someone for having radical thoughts. It’s not a crime in Canada,’ RCMP Supt. Martine Fontaine told a news conference Tuesday. On Monday, Couture-Rouleau struck two members of the military with his car in a St-Jean-sur-Richelieu, Que., parking lot in what CSIS has described as ‘the violent expression of an extremist ideology.’ One of those victims, Warrant Officer Patrice Vincent, has since died. Couture-Rouleau was shot and killed by police following a high-speed chase as he fled the scene” (CBC News 2014b).</td>
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<td>[2 \text{fatalities (terrorism)}]</td>
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<td>“About 1,000 people turned out for the second weekly march organized by pro-Palestinian advocates, many of whom are connected to the University of Calgary. Jake Birrell, who was one of a few Israel supporters, said he was dragged several feet by an Israeli flag tied around his neck. He was also bruised and scratched” (Gerson 2014). (Anti-Semitism)</td>
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<td>“On Thursday there was a riot in Toronto. About 200 Palestinian extremists, waving Palestinian flags, shouting about Jews and Israel, beat up a handful of Canadians so badly that an ambulance had to be called to take away an injured man” (Levant 2014). (Anti-Semitism)</td>
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Table A3. Exemplary Incidents of Grievances during the Period 2000–2014

<table>
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<tr>
<th>Type of grievances</th>
<th>Canada’s Jews</th>
<th>Canada’s Muslims</th>
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<tr>
<td>Religious grievances</td>
<td>“The issue of prayer at official government events was a matter of continuing concern. […] In February 2000 the question was raised in the small town of Carleton Place, Ontario. In response to a complaint by a Jew who lived nearby, the mayor declared that it was ‘extremely offensive’ not to be able to recite the prayer. […] In a letter to the municipal minister and the legislative speaker, CJC Ontario region chair Landy also asked that the prayer no longer be recited in the provincial legislature. The response was that the legislature would continue to open with the Lord’s Prayer because most members wished to continue the practice despite the court ruling about municipalities” (AJYB 2001).</td>
<td>“In March 2006 the Quebec Human Rights Commission decided that a Montreal engineering school must allow its Muslim students to pray in dignity, although the school is not obligated to provide students with a dedicated prayer space. The school had previously blocked Muslim students from praying in school hallways and stairways, leading to the 2003 filing of a complaint” (RFR 2006).</td>
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<td>“In June, the Court of Appeal, Ontario’s highest court, legalized same-sex marriage on constitutional grounds, holding that existing law offended human dignity, discriminated on the basis of sexual orientation, and denied equal rights. Rabbi Dovid Schochet, head of Toronto’s Vaad Harabonim (Orthodox rabbinical organization), declared the decision ‘a chilul Hashem, a desecration of God’s name and law’” (AJYB 2004).</td>
<td>“In February 2006 the Muslim leader filed a complaint after the Western Standard reprinted Danish cartoons of the Prophet Muhammad. A similar complaint against Levant from a local Islamic council remained before the Commission; the case was pending at the end of the reporting period” (RFR 2008).</td>
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<td>“Ontario’s Bill 27, an amendment to the Arbitration Act motivated by a desire to prevent the operation of Islamic courts based on sharia, had the effect of weakening the long-established bet din system in the Jewish community. Attorney John Syrtash, representing several Orthodox groups, expressed strenuous opposition to the bill, suggesting that it might be unconstitutional and terming it ‘blatantly unfair.’ […] CJC Ontario’s honorary legal counsel Mark Freiman said that the law inaccurately ‘presumes that faith-based arbitration is innately exploitative and coercive,’ and Syrtash announced he would challenge it in court” (AJYB 2007).</td>
<td>“In April 2007 five Muslim girls were barred from participating in a Tae Kwon Do tournament due to a ban on head coverings for safety reasons. In February 2007 a young Muslim girl was ejected from a soccer game for wearing a hijab, which violated a Quebec Soccer Association safety rule. The referee claimed the hijab increased the risk of injury during play. In both cases the girls claimed the rules were being enforced without regard for religious considerations” (RFR 2007).</td>
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<td>Political grievances</td>
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<td><strong>“David Moyal of Toronto launched cases in the Ontario Human Rights Commission and</strong></td>
<td><strong>“In April 2008 the provincial Ontario Human Rights Commission dismissed a complaint</strong></td>
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<td><strong>the Ontario Rental Housing Tribunal alleging that his landlord had prevented him</strong></td>
<td><strong>filed by the Canadian Islamic Congress (CIC) and a group of law students against</strong></td>
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<td><strong>from erecting a sukkah on the holiday of Sukkot. He charged that he had suffered</strong></td>
<td><strong>Maclean’s magazine regarding the publication of a selection of articles and book</strong></td>
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<td><strong>discrimination and that the enjoyment of his apartment had been diminished” (AJYB</strong></td>
<td><strong>excerpts by author Mark Steyn between 2005 and July 2007. The group filed</strong></td>
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<td><strong>2008).”</strong></td>
<td><strong>concurrent complaints with the federal Canadian Human Rights Commission and</strong></td>
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<td><strong>provincial human rights commissions in Ontario and British Columbia, alleging</strong></td>
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<td><strong>that the magazine violated human rights by publishing anti-Islamic articles and</strong></td>
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<td><strong>refusing to publish the CIC’s rebuttal. Although the Ontario Human Rights</strong></td>
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<td><strong>Commission ruled it had no jurisdiction over print media, it denounced the</strong></td>
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<td><strong>magazine for “Islamophobic portrayals of Muslims” and “promoting destructive,</strong></td>
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<td><strong>xenophobic opinions.” In June 2008 the federal Canadian Human Rights</strong></td>
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<td><strong>Commission ruled there were no grounds to proceed with the complaint. The</strong></td>
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<td><strong>British Columbia Human Rights Tribunal held hearings that closed in June 2008;</strong></td>
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<td>*<em>the tribunal’s ruling was pending at the end of the reporting period” (RFR 2008).</em></td>
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<td><strong>“Canada’s foreign policy with regard to Israel and the Palestinians was a major</strong></td>
<td><strong>“In 2004 CAIR-CAN [the Canadian Council on American-Islamic Relations] filed a libel</strong></td>
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<td><strong>issue during the year [of 2000]. The community was outraged that Canada joined</strong></td>
<td><strong>suit against David Harris, a specialist in counter-terrorism who was formerly a</strong></td>
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<td><strong>13 other members of the UN Security Council in approving Resolution 1322 in</strong></td>
<td><strong>senior official with the Canadian Security Intelligence Service (CSIS), Canada’s</strong></td>
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<td><strong>October. Canada-Israel Committee (CIC) chair Joseph Wilder told the prime</strong></td>
<td><strong>foreign intelligence agency. In an April 2004 interview on Ottawa radio</strong></td>
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<td><strong>minister that there had not been ‘such unrest and anxiety in the Jewish</strong></td>
<td><strong>station CFRA, Harris, responding to a Hamas suicide-terrorist attack against</strong></td>
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<td><strong>community since perhaps 1973’ and that Jews felt ‘deserted’ by their government”</strong></td>
<td><strong>Israeli civilians, had suggested that Canadian authorities</strong></td>
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<td><strong>should look into how funds raised in Canada by CAIR-CAN were being used, as well</strong></td>
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<td><strong>as the organization’s relationship with American CAIR. CAIR-CAN was forced to</strong></td>
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<td><strong>withdraw its suit against Harris and the radio station two years later” (Goldberg</strong></td>
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<td><strong>2010).</strong></td>
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<td><strong>“B’nai Brith Canada expressed ongoing concern about a rising tide of hate crimes</strong></td>
<td><strong>“Israel’s consul general in Toronto, Ya’acov Brosh, got into trouble for saying</strong></td>
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<td><strong>and anti-Semitic incidents that was clearly tied to the new round of Palestinian</strong></td>
<td><strong>in May that while not all Muslims were terrorists, most terrorists were Muslim.</strong></td>
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<td><strong>violence that began in late 2000” (AJYB 2002).”</strong></td>
<td><strong>After protests from Muslim leaders, the Department of Foreign Affairs called in</strong></td>
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<td><strong>Israel’s ambassador for a discussion” (AJYB 2006).”</strong></td>
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“In January, the Lebanese ambassador, Raymond Baaklini, accused Canada of buckling under pressure from what he called a ‘Zionist party’ that ‘controls 90 percent of the Canadian media’ when it added Hezbollah to its list of terrorist organizations in late 2002. [...] Jewish organizations called in vain for the revocation of his credentials [...]” (AJYB 2004).

“Almost everyone living in Quebec’s tiny town of Herouxville is white, French-speaking, and Catholic. But that didn’t stop local officials from adopting a rule of conduct for immigrants. [...] But some Muslim leaders have called the code a thinly veiled example of xenophobia. ‘Racism is coming out of the woodwork now, and it’s not being obscure or subtle,’ said Salaam Elmenyawi of the Muslim Council of Montreal” (Kahane 2007).

“At year’s end [2004], B’nai Brith Canada issued a report critical of Canada’s performance in the [UN] General Assembly session, noting that its delegation voted for or abstained on 17 of the 19 resolutions B’nai Brith deemed to be tinged with anti-Semitism” (AJYB 2005).

“Mohamed Elmasry, president of the Canadian Islamic Congress, charged in January [2007] that Foreign Minister MacKay was ‘not accessible to the Canadian Arab and Muslim community.’ The Canadian Arab Federation joined together with Elmasry’s organization in a campaign to dissuade members of various groups from voting Conservative in the next election” (AJYB 2008).

“University workers in the Canadian Union of Public Employees have passed a controversial motion calling for an academic boycott of Israel, and union members from at least one Toronto university are planning to pressure their school to cut any financial ties with the country. [...] Members of Jewish organizations say the motion sets a dangerous precedent by singling out Israel and vow to keep fighting it. [...] Estimates on the number of people who showed up to protest CUPE’s meeting in Windsor varied - from 35 reported by CUPE to more than 100 estimated by Weinstein. They were met with pro-Palestinian demonstrators” (Morrow 2009).

“A Canadian mosque that came under fire last week for publishing slurs and advocating a conservative lifestyle for Muslims is fighting back against what it said was distortion and discrimination. Mohamed Abou-Bakr, an official at the administration of the Khalid bin al-Walid Mosque in Toronto, told AlArabiya.net that the mosque had sent a complaint to the Canadian newspaper the Toronto Star after an article alleging it publicized slurs against Jews and Western societies on its website and warned members against integration. The complaint accused the paper of ‘distorting’ the content of the mosque’s website in an attempt to ‘turn society against the mosque by charging it and the entire Muslim community in Canada of terrorism’” (Nayouf 2008).

“Eight Muslim women who filed a human rights complaint against the United Parcel Service (UPS) over a dress code dispute have settled with the company. [...] The women, all devout Muslims, lost their jobs in 2005 because they refused to hike their skirts above the knee over their long pants. They argued that Islam requires them to be fully covered for modesty and alleged discrimination on the basis of religion and gender” (Loriggio 2008).

<table>
<thead>
<tr>
<th>Economic grievances</th>
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<tr>
<td>“In August [2001], the Federal Court of Appeal in Ottawa ruled in favor of Andrew Liebmann. He had been a reserve lieutenant in the navy during the period of the Gulf War in 1991 and had sued after being barred from an important assignment in the Persian Gulf because he was Jewish” (AJYB 2002).</td>
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<tr>
<td>“In August [2001], the Federal Court of Appeal in Ottawa ruled in favor of Andrew Liebmann. He had been a reserve lieutenant in the navy during the period of the Gulf War in 1991 and had sued after being barred from an important assignment in the Persian Gulf because he was Jewish” (AJYB 2002).</td>
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</table>
“A compromise has been reached in the case of a Muslim woman suspended from her job at Pearson International Airport because of the length of her skirt. Halima Muse was suspended in August from her job as a screener with a security firm for wearing a skirt longer than the knee-length one supplied with her uniform. [...] The Teamsters and the Canadian Council on American-Islamic Relations said Monday that they filed a religious discrimination complaint on her behalf” (The Canadian Press 2007).

“In 2011, NCCM [National Council of Canadian Muslims] represented a correctional officer of Montreal’s Bordeaux Detention Centre that was fired in 2007 for wearing the hijab, in her complaint before the Commission des droits de la personne and des droits de la jeunesse and supported her case before the Quebec Human Rights Tribunal” (NCCM 2013).

“Three Muslim workers at a popular restaurant in Leslieville have been awarded almost $100,000 after a human rights tribunal found they had been forced to eat pork, mocked for speaking Bengali, frequently referred to as sh-t, and threatened with replacement by ‘white’ staff. [...] Malik and his two former co-workers, Mohammed Islam and Arif Hossain, approached the tribunal separately in early 2011 soon after they were fired or, in Islam’s case, quit. The case was eventually consolidated and heard earlier this year” (Aulakh 2013).
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