

INTERRELIGIOUS RELATIONS

**Covid-19 and Religious Organisations:
Constitutional Environment and Organisational Choices**

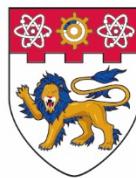
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**JACLYN L. NEO
SHAZNY RAMLAN**



Nanyang Technological University, Singapore

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INTERRELIGIOUS RELATIONS

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**Covid-19 and Religious Organisations:
Constitutional Environment and Organisational Choices**

**Jaclyn L. Neo and
Shazny Ramlan**

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Abstract

Religious organisations play critical functions in societies around the world. The role of religious organisations in secular states however tends to be under-studied in disciplines outside of the sub-discipline of sociology of religious organisation. Within some disciplines, including law, this is partly because of the dominant view that secular states should stand apart from religion (and religious organisations), and that any entanglement would undermine the “neutrality” of the state, and hence its secularity. There has been increased attention on religious organizations in relation to their responses to COVID-19 measures, which included restricting religious gatherings and other collective religious activities. These restrictions go to the heart of religious practice. How religious organisations responded however depend on a range of factors, including their status within the social order. In this article, we further discuss how the constitutional environment shapes the religious organisations' responses to Covid-19 restrictions. By constitutional environment, we refer to the existing constitutional arrangement of state and religion, and the degree to which the constitutional right to freedom of religion is founded on a strong idea of individual and group rights, as opposed to being seen as subjected to or even subsidiary to public interests. Where the constitutional environment is seen as conducive to rights-assertion, religious organisations are more likely to resist state restrictions because such action would enhance their standing among their own adherents. Under such conditions, they performatively present themselves as freedom fighters standing against state oppression. Filing a lawsuit against Covid-19 measures is seen as an act of resistance in pursuit of freedom and divine blessings. In contrast, where the constitutional environment is not conducive to rights claims but emphasises communitarian values, religious organisations would tend to employ the language of duties in complying with state restrictions. Many, however, do not do this simply as passive subjects but may consciously adopt public health values and encourage their adherents to do the same because doing so could enhance their social standing and legitimacy. Thus, by emphasising their value to society through an explicit commitment to public health, specifically, and to the community's interests, more generally, and avoiding an emphatic insistence on rights, Covid-19 became an opportunity for religious organisations to performatively present themselves as *civic-minded* and *socially responsible* social actors. This allowed them to frame their adoption of public health measures partly as group choices, and not merely top-down imposition by the state.

Introduction

Religious organisations play critical functions in societies around the world. Some religious organisations pre-date the creation of some modern states, having a grassroots reach that could even exceed that of the government in power. The role of religious organisations in secular states however tends to be under-studied in disciplines outside of the sub-discipline of sociology of religious organisation.¹ Within some disciplines, including law, this is partly because of the dominant view that secular states should stand apart from religion (and religious organisations), and that any entanglement would undermine the “neutrality” of the state, and hence its secularity. Whether one exhorts “principled distance,”² “minimal boundaries of freedom of action,”³ “twin tolerations,”⁴ or “two-way protection,”⁵ these accounts remain rooted in a modernising claim of secularisation, which tends to see the relationship between religious organisations and the “secular” government as problematic. This cautious regard of a close relationship between the state and religious organisations is not entirely unwarranted. When religious organisations wield tremendous political power, they may be able to strongly influence government policy, sometimes successfully advocating for policy changes supported by a religious majority, but also at times, opposing changes that may otherwise be supported by a majority of society.⁶

A failure to engage religious organisations could create its own patterns of discrimination and marginalisation of religious societies. On a practical level, this could also result in a gap in state policy and undermine state responsiveness to social values, especially if the society remains largely religious. Religious organisations are after all sources of information for their members/followers, functioning as their normative and epistemic authorities.⁷ Religious members make sense of their everyday experiences, in varying degrees, by reference to their religious epistemology. Members may look to religious organisations for guidance on almost any subject-matter. Accordingly, religious organisations could wield tremendous influence in their members’ making of private decisions (for instance, regarding personal relationships) and public choices (for instance, voting behaviour). In some instances, members may even view religious organisations as more legitimate than the state. Problems could then arise when members regard information obtained from religious organisations as the more authoritative or even *the* correct view, which, if contradictory to the general law or prevailing policies, could affect members’ compliance.

The Covid-19 pandemic and attendant state measures have shifted conditions for the usual functioning of religious organisations. Restrictions on religious gatherings, which could entail the mandatory ceasing of in-person activities for large, and sometimes even small groups, of worshippers, were put in place by governments as part of wider control measures to curb the spread of the virus. These more stringent restrictions were contrary to the World Health Organization (WHO) guidelines, which focused on risk-management of religious gatherings, rather than suspension of socio-religious activities entirely.⁸ Many states however classified religious gathering a high-risk activity, fuelled partly as some religious gatherings became super-spreader events to much public opprobrium. For instance, in South Korea and India, some religious organisations were accused of escalating the outbreak, and even labelled terrorists and murderers.⁹

¹ See generally, Christopher P. Scheitler and Kevin D. Dougherty, “The Sociology of Religious Organisations,” *Sociology Compass* 2.3 (2008): 981-99.

² Rajeev Bhargava, “Reimagining Secularism: Respect, Domination and Principled Distance,” *Economic and Political Weekly* 48.50 (2013): 79-92, 86-87.

³ Alfred Stepan, *Arguing Comparative Politics*, New York, NY: Oxford University Press, 2001, 216.

⁴ Alfred Stepan, “Religion, Democracy and the ‘Twin Toleration’,” *Journal of Democracy* 11 (2000): 27-57.

⁵ Amy Gutmann, *Identity in Democracy*, Princeton, NJ: Princeton University Press, 2003, 152.

⁶ See for example, Jennifer Sta. Ana, “The State and the Church in the Debates over Reproductive Health and Population Control,” *Publiko* (2 January 2016).

⁷ Nukhet A. Sandal, “Religious actors as epistemic communities in conflict transformation: the cases of South Africa and Northern Ireland,” *Review of International Studies* 37 (2011): 929-49, 934-35.

⁸ World Health Organisation, “WHO mass gathering COVID-19 risk assessment tool – Religious events,” (10 July 2020), available at: <https://www.who.int/publications/item/10665-333186>.

⁹ See discussion in Danielle N. Boaz, “Between ‘Essential Services’ and Culpable Homicide: State Responses to Religious Organisations and the Spread of the Novel Coronavirus in 2020,” *Journal of Law, Religion, & State* 8.2/3 (2020): 129-51.

Religious organisations in turn responded in different ways to the restrictions. Restrictions on religious gathering go to the heart of religious practice. In most if not all religions, mass gathering for worship is a core ritual integral to religious practice.¹⁰ Such collective activities also tend to be connected to the mental health and well-being of adherents.¹¹ At the same time, the public health risks involved in such large gatherings of people, often in close contact with one another, are very real and measures imposed are not necessarily nefarious or specifically targeting religion. Indeed, different religions may respond differently to restrictions, depending on the extent to which the restrictions affect the core of their religious practice as well as the social and political conditions in which they function. Accordingly, it is important to note that even within a single jurisdiction, there could be varying receptiveness among different religious organisations to state restrictions.¹² A range of factors could be involved. In this article, we discuss specifically how the constitutional environment shapes the religious organisations' responses to Covid-19 restrictions.

By constitutional environment, we refer to the existing constitutional arrangement of state and religion, and the degree to which the constitutional right to freedom of religion is founded on a strong idea of individual and group rights, as opposed to being seen as subjected to or even subsidiary to public interests. This influences whether religious organisations take an antagonistic approach, employing the strong language of rights against state measures, or whether they take a more cooperative approach, taking on instead the language of duties. These approaches could be seen as existing on a spectrum, with most religious organisations responding to the measures in a variety of ways, which may change over time. This article examines these two approaches. It argues that when religious organisations assess their constitutional environment as being conducive, even encouraging of rights claims against the state, they are more likely to resist state restrictions because such action would enhance their standing among their own adherents. Under such conditions, they performatively present themselves as freedom fighters standing against state oppression. Filing a lawsuit against Covid-19 measures is seen as an act of resistance in pursuit of freedom and divine blessings.

In contrast, where the constitutional environment is not conducive to rights claims but emphasises communitarian values, religious organisations would tend to employ the language of duties in complying with state restrictions. Many however do not do this simply as passive subjects but tend to consciously adopt public health values and encourage their adherents to do the same because doing so could enhance their social standing and legitimacy. Thus, by emphasising their value to society through an explicit commitment to public health, specifically, and to the community's interests, more generally, and avoiding an emphatic insistence on rights, Covid-19 became an opportunity for religious organisations to performatively present themselves as *civic-minded* and *socially responsible* social actors. This allowed them to frame their adoption of public health measures partly as group choices, and not merely top-down imposition by the state.

Constitutional Environment and Religious Organisations

The study of religious organisations as organisations has contributed to a deeper understanding of these groups.¹³ Beyond the church-sect typology lies a variety of approaches examining the external environments, organisational ecology, norms and perceptions driving activity and innovations within religious

¹⁰ Melford E. Spiro, "Religion: Problems of Definition and Explanation," in *Anthropological Approaches to the Study of Religion*, ed. Michael Banton, Oxford: Routledge, 2004 [1966], 85-126, 106-14.

¹¹ Patty van Cappellen and Bernard Rimé, "Positive Emotions and Self-Transcendence," in *Religion, Personality, and Social Behavior*, ed. Vassilis Saroglou, New York, NY & London: Psychology Press, 2014, 123-145, 127-37.

¹² For instance, in a recent special issue in the *Journal of Law, Religion, and State*, authors point to various religious communities and variations in their responses in Bosnia-Herzegovina, and Indonesia. See Nedim Begović, "Restrictions on Religion due to the Covid-19 Pandemic: Responses of Religious Communities in Bosnia and Herzegovina," *Journal of Law, Religion, and State* 8.2/3 (2020): 228-50; Amos Sukamto and S. Panca Parulian, "Religious Community Responses to the Public Policy of the Indonesian Government Related to the Covid-19 Pandemic," *Journal of Law, Religion, and State* 8.2/3 (2020): 273-83.

¹³ See generally, Scheitler and Dougherty, "The Sociology of Religious Organisations"; Tricia C. Bruce and Josh Packard, "Organisational Innovation," in *Handbook of Religion and Society, Handbooks of Sociology and Social Research*, ed. David Yamane, New York, NY: Springer, 2016, 155-176.

organisations.¹⁴ Religious organisations play a range of functions within society, standing apart from governments though never entirely separated from them. Religious organisations bring members “to act together more effectively to pursue shared objectives.”¹⁵ They may facilitate social cohesion¹⁶ by preserving “connections among individuals – social networks and the norms of reciprocity and trustworthiness that arise from them.”¹⁷ In the context of the United States, Robert Putnam observes the harms of individualism emphasised in American life and sees religious organisations, amongst other social organizations, as “an effective antidote to the decline in civic consciousness, mutual trust, and strength of social bonds that characterizes social life … in late modern America.”¹⁸ Religious organisations may also fill gaps in government provision of social services¹⁹ to promote “individual health and happiness to child welfare and education, social tolerance, economic prosperity, reduced ethnic violence and good institutional performance.”²⁰ Despite a more militant secular claim for privatisation of religion, religious organisations have continued to play important roles in the public sphere. Whether one sees this as a post-secular phenomenon, or simply as a continuing phenomenon, José Casanova observes that the “de-privatization” of religion allows religious organisations to “raise normative issues, [by] participating in ongoing processes of normative contestation” in the public sphere.²¹ In other words, religious organisations can participate and contribute to political discussions while, as “epistemic authorities,” help their members make sense of their existence and purpose generally and politically, in accordance with their religious texts.²²

How religious organisations conduct their activities is shaped by both external and internal environments. On the latter, the religious organisations’ internal norms, specifically the values these organisations hold as being core to their organisational mission, determine whether they comply with restrictions and how so. Their internal norms also depend on their particular interpretations of theological claims, including whether they adopt theological claims of resistance against the state. Another important factor could be the perspectives of the religious organisations concerning their role in society and the relationship with the wider society; how religious organisations react to the state restrictions – whether they present themselves as assertive rights-holders or as socially responsible members of society – could have a significant impact on their sociological legitimacy.²³

In terms of external environment, religious organisations depend on the legal-political as well as social context. For instance, some have argued that an increasingly plural (and competitive) religious environment

¹⁴ Bruce and Packard, “Organisational Innovation”; Scheitler and Dougherty, “The Sociology of Religious Organisations,” 981.

¹⁵ Robert D. Putnam, “The Strange Disappearance of Civic America,” *The American Prospect* (19 Dec 2001), available at <https://prospect.org/infrastructure/strange-disappearance-civic-america/>. For a critique on Putnam’s social capital theory, see Barbara Arniel, *Diverse Communities: The Problem with Social Capital*, New York, NY: Cambridge University Press, 2006.

¹⁶ Pippa Norris and Ronald Inglehart (eds.), *Sacred and Secular: Religion and Politics Worldwide*, Cambridge: Cambridge University Press, 2012, 181.

¹⁷ Robert D. Putnam, *Bowling Alone: The Collapse and Revival of American Community*, New York, NY: Simon & Schuster, 2000, 19.

¹⁸ Sarah Ghatak and Andrew Stuart Abel, “Power/Faith: Governmentality, Religion and Post-Secular Societies,” *International Journal of Politics, Culture and Society* 26.3 (2013): 217-35, 222.

¹⁹ Norris & Inglehart, *Sacred and Secular*, 181.

²⁰ Ghatak & Abel, “Power/Faith,” 222. See also Elizabeth Ferris, “Faith-based and secular humanitarian organisation,” *International Review of the Red Cross* 87.858 (2005): 311-25, 317; Margot Trotter Davis, “Religious and non-religious components in substance abuse treatment: A comparative analysis of faith-based and secular interventions,” *Journal of Social Work* 14.3 (2014): 243-59, 245.

²¹ José Casanova, “Civil Society and Religion: Retrospective Reflections on Catholicism and Prospective Reflections on Islam,” *Social Research* 68.4 (2001): 1041-80, 1048.

²² Sandal, “Religious actors as epistemic communities in conflict transformation,” 934-35.

²³ “Legitimation” as a process for religious organisations to gain legitimacy is defined by “efforts … deliberately made to influence, manipulate, and control people’s thoughts, feelings, and actions in accordance with various religious values”: Dwight B. Billings and Shauna L. Scott, “Religion and Political Legitimation,” *Annual Review of Sociology* 20 (1994): 173-202, 174. It is a process of consolidating “power”, in the Foucauldian sense, and the struggle to gain power, see James A. Beckford, “The restoration of ‘power’ to the sociology of religion,” *Sociological Analysis* 44.1 (1983): 11-32, 29. In the context of the secular state, religious organisations have to choose how they gain “power” and thus become socially and/or politically “legitimate” – either by collaborating with the state or by going “to the trenches of popular struggle, including even recourse to violent tactics” in opposition to the state, see Billings & Scott, “Religion and Political Legitimation,” 174.

drives innovations among religious organisations.²⁴ In terms of legal-political context, the constitutional environment plays a significant role in shaping religious organisations' relationship with the state and society, and thereby their responses to any state restrictions precisely because the law, as practised, determines the degree to which they can and would engage the courts. This however is not merely determined by the text of the constitution, but is to be understood as instantiated by constitutional practice and constitutional culture. The curtailment of religious activity due to Covid-19 is not concerned solely with violations to the right to freedom of religion, but implicates other rights, particularly, the freedom of association.²⁵ The extent to which the constitutional environment is conducive for rights claims against such curtailment would significantly impact how religious organisations navigate these restrictions.

Constitutional Rights and a Constitutional Environment of Resistance as Preserving Freedom

Where the constitutional environment is conducive to, or even encouraging of the use of rights-language to pursue religious aims, this provides incentives for religious groups to employ rights-litigation to oppose restrictive state measures. Scholars have observed the tendency for hyper judicialization of rights and politics in jurisdictions that have an American-style model of judicial review.²⁶ This model is premised on a distrust of government and sees the court as the primary forum for the protection of rights.²⁷ Under conditions of distrust, opposing the government for alleged encroachment of rights, including the right to religious freedom, could be seen as a heroic act. Accordingly, when religious organisations oppose government's efforts to resist Covid-19 measures, this could be seen as an outcome of rational calculation. The reactions of some religious organisations in the United States reflect this calculus. There, several religious organisations gained infamy for vocally resisting state measures to restrict religious gatherings and worship, setting up clashes with state authorities. This is influenced by the constitutional environment, which is conducive to rights-litigation and premised upon a distrust of government. Much of the rights-litigation concerning religion is centred upon the First Amendment of the United States Constitution, which states:

Congress shall make *no law respecting an establishment of religion, or prohibiting the free exercise thereof*, or abridging the freedom of speech, or of the press, or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances. [emphasis added]

This is supplemented by the Fourteenth Amendment, which promises "equal protection of the laws", and religion is commonly regarded as a "suspect class" requiring strict scrutiny.²⁸ In the context of the United States' constitutional history involving strong protection for religious denominations, there is an established history and entrenched culture of asserting constitutional rights against perceived state encroachment on religious freedom. It is perhaps no wonder that the language of rights was also employed by religious groups to resist Covid-19 measures, which included restrictions on religious activities, shutting down of religious places of worship albeit with limited exemptions.²⁹ Many Christian organisations, in particular, saw this as an

²⁴ Bruce and Packard, "Organisational Innovation."

²⁵ Mark Hill QC, "Coronavirus and the Curtailment of Religious Liberty," *Laws* 9.4, 27 (2020).

²⁶ Ran Hirschl, *Towards Juristocracy: The Origins and Consequences of New Constitutionalism*, Cambridge, MA: Harvard University Press, 2004. See also, for example, Tom Ginsburg and Mila Versteeg, "Why Do Countries Adopt Constitutional Review?," *The Journal of Law, Economics & Organisation* 30.3 (2014): 587-622.

²⁷ See Anne-Marie Slaughter, "Judicial Globalisation," *Virginia Journal of International Law* 40 (2000): 1103-124; John Hart Ely, *Democracy and Distrust: A Theory of Judicial Review*, Cambridge, MA: Harvard University Press, 1980.

²⁸ Susan Gelman & Susan Looper-Friedman, "Thou Shalt Use the Equal Protection Clause for Religion Cases (Not Just the Establishment Clause)", *University of Pennsylvania Journal of Constitutional Law* 10(4) (2008) 665; Bret Boyce, "Equality and the Free Exercise of Religion," *Cleveland State Law Review* 57 (2009): 493-552, 500-06.

²⁹ 13 states impose restrictions to religious activities while five prohibit them, see Becket Fund Visualisations, "COVID In-Person Worship Restrictions," *Tableau* (9 October 2020), available at:

<https://public.tableau.com/profile/caleb.lyman#!/vizhome/COVID-Map-Geo-Public-Website-Size/COVID-Map-Geo-600px-wide>.

"intolerable reduction of their religious freedom",³⁰ with several filing suit claiming a violation of their First Amendment and Fourteenth Amendment rights. Lawsuits that have emerged from allegedly discriminatory Covid-19 restrictions in the U.S. include: the banning of drive-through church services that observed social distancing but permitting of drive-through services for retail and commercial purposes in Chattanooga City, Tennessee;³¹ resumption of in-person lessons for public schools but not religious schools, which are private schools in Oregon,³² and the imposition of a 25% capacity limit for places of worship in California that are not imposed on "comparable secular establishments".³³ The success of the religious organisations' litigation against these restrictions has been mixed. The United States Supreme Court has affirmed that there is "compelling governmental interest" in containing the spread of the deadly coronavirus,³⁴ but that restrictions cannot discriminate against religious organisations. Thus, restrictions in Ohio,³⁵ New York³⁶ and Nevada³⁷ that treat religious schools or religious services less favourably than commercial establishments have been declared unconstitutional.³⁸

Much of the litigation frames the conflict in terms of individual and group rights to freedom of religious exercise, on the one hand, and the legitimacy and reasonableness of state restrictions to protect public health, on the other.³⁹ The degree to which religious groups employ the language of rights is also influenced by their particular position in the social order. Thus, many cases opposing Covid-19 restrictions were initiated by Protestant churches, which is the dominant religion in the United States, whereas smaller religious communities like the Muslim community generally did not openly oppose the measures. Others were initiated by the Roman Catholic Church⁴⁰ and Orthodox Jewish groups.⁴¹

The degree to which religious organisations opposed Covid-19 measures reflects a calculus about how their actions would impact their social legitimacy. Pastors and churches defying the measures encouraged members to resist Covid-19 restrictions, either through passive non-compliance or active protests,⁴² because they saw this as bolstering their legitimacy among the members. Calling Covid-19 a "phantom plague" for instance,⁴³ religious leaders framed their resistance in theological terms, with some claiming that theirs were acts of spiritual warfare.⁴⁴ Some claimed that the restrictions were satanic schemes to prevent Christians from

³⁰ Jeffrey Haynes, "Donald Trump, the Christian Right and COVID-19: The Politics of Religious Freedom," *Laws* 10.1, 6 (2021).

³¹ *Turkeisha Douglass v. Andy Burke, Mayor; & City of Chattanooga*, 1:20-CV-00101-DCLC (E.D. Tenn. Sep. 17, 2020); WTVC, "Update: Church that sued city, Mayor Berke drops lawsuit," *News Channel 9* (17 April 2020), available at: <https://newschannel9.com/news/local/chattanooga-church-sues-city-for-banning-drive-in-services>.

³² *Horizon Christian School et al. v Kate Brown, Governor of the State of Oregon* (U.S. 9th Cir., No. 21-35005) (2021). Note, however, that this is an ongoing case and a judgment has not yet been published.

³³ *South Bay United Pentecostal Church v. Gavin Newsom, Governor of California*, 592 U.S. 2021; 141 S. Ct. 716 (2021).

³⁴ *South Bay* at 1613-1614.

³⁵ *Monclova Christian Academy et al. v Toledo-Lucas County Health Department* (U.S. 6th Cir., No. 20-4300) (31 Dec 2020) [henceforth "Monclova"].

³⁶ *Roman Catholic Diocese of Brooklyn, New York v. Andrew M. Cuomo, Governor Of New York*, 592 U.S. (2020) [henceforth "Roman Catholic Diocese of Brooklyn"]; *Agudath Israel of America & Roman Catholic Diocese of Brooklyn, New York v. Andrew M. Cuomo, Governor Of New York* (983 F.3d 620, Dec. 28 2020) [henceforth "Agudath Israel of America & Roman Catholic Diocese of Brooklyn"]. For a case commentary, see Wendy E. Parmet, "Roman Catholic Diocese of Brooklyn v. Cuomo – The Supreme Court and Pandemic Controls," *New England Journal of Medicine* 384 (2021)199-201.

³⁷ *Calvary Chapel Dayton Valley v. Steve Sisolak, Governor of Nevada et al.*, 140 S.Ct. 2603 (2020).

³⁸ *Roman Catholic Diocese of Brooklyn* at 5-6; *Monclova* at 5-7.

³⁹ Hill, "Coronavirus and the Curtailment of Religious Liberty," 10-16.

⁴⁰ *Roman Catholic Diocese of Brooklyn*.

⁴¹ *Agudath Israel of America & Roman Catholic Diocese of Brooklyn*.

⁴² See for instance, Anon, "Louisiana church packed for services again despite charges against pastor amid pandemic," *CBS News* (1 April 2020), available at: <https://www.cbsnews.com/news/coronavirus-louisiana-life-tabernacle-church-packed-services-again-charges-against-pastor-tony-spell/>; Valerie C. Brannon, "UPDATE: Banning Religious Assemblies to Stop the Spread of COVID-19," *Congressional Research Service* (1 June 2020), available at: <https://crsreports.congress.gov/product/pdf/LSB/LSB10450>.

⁴³ Alan Woodward, "'A phantom plague': America's Bible Belt Played down the Pandemic and Even Cashed in. Now Dozens of Pastors are Dead," *The Independent* (24 April 2020), available at:

<https://www.independent.co.uk/news/world/americas/bible-belt-us-coronavirus-pandemic-pastors-church-a9481226.html>.

⁴⁴ Richard Hall, "'Satan will not stop us': Some Christian pastors plan showdown with coronavirus this Easter," *The Independent* (10 April 2020), available at: <https://www.independent.co.uk/news/world/americas/easter-church-coronavirus-megachurch-pastors-donald-trump-a9460246.html>.

worshipping,⁴⁵ thereby urging adherents to prioritise their religious commitments over state restrictions.⁴⁶ Pastors who were fined proclaimed that it was religious persecution, flaunted their martyrdom, and continued to perform services.⁴⁷

Jeffrey Haynes observed the close association between religious organisations that oppose Covid-19 measures with the ideology of the Christian Right or Christian nationalism.⁴⁸ Christian nationalism is an ideology associated with a particular vision of America as a Christian and white nation.⁴⁹ To some extent, religious organisations defying state restrictions could also be mapped onto a political divide within the United States along party lines,⁵⁰ though this has changed since the new administration came into power in 2021.⁵¹ Research shows that adherence to a Christian nationalist view is a “good indicator” of resistance to anti-virus precautionary measures.⁵² Protests went beyond closures of religious places of worship as some religious organisations also framed the mask mandate as a religious issue, opposing it on the basis that it violates their freedom of speech and even freedom of conscience.⁵³ Others argue that resistance in general is necessary lest the government forces individuals to receive the vaccine against their will, which they see as a further contravention of their freedom of conscience.⁵⁴ Covid-19 vaccine hesitancy among white evangelicals has been a major obstacle for the vaccination drive in the United States, and is founded upon a deep mistrust of government.⁵⁵ Thus, even while the general society may angrily criticise churches for contributing to the outbreak,⁵⁶ within this constitutional environment, religious organisations defying Covid-19 measures regard their acts as necessary,

⁴⁵ Ibid.

⁴⁶ Blake Fussell, “Some Calif. churches plan to defy new gathering ban: ‘My mandate is to obey the Word of God,’” *The Christian Post* (17 July 2020), available at: <https://www.christianpost.com/news/some-california-churches-plan-to-defy-new-gathering-ban-my-mandate-is-to-obey-the-word-of-god.html?clickType=link-related-articles>; Anon, “There’s a Bigger Law: Pastor to Continue Services After COVID-19 Health Order Fines,” *NBC Bay Area* (8 December 2020), available at: <https://www.nbcbayarea.com/news/local/san-jose-pastor-to-face-contempt-charge-after-defying-county-health-order/2417834/>.

⁴⁷ See for instance , David K. Li, “Florida pastor arrested after holding church services despite coronavirus orders,” *NBC News* (31 March 2020), available at: <https://www.nbcnews.com/news/us-news/florida-pastor-arrested-after-holding-church-services-despite-coronavirus-orders-n1172276>.

⁴⁸ Haynes, “Donald Trump, the Christian Right and COVID-19.”

⁴⁹ Rob Cameron, “White Supremacy Created the Capitol Assault,” *Foreign Policy* (11 January 2021), available at: <https://foreignpolicy.com/2021/01/11/white-supremacy-capitol-assault-trump-supporters/>.

⁵⁰ Marc J. Hetherington and Isaac D. Mehlhaff, “American attitudes toward covid-19 are divided by party. The pandemic itself might undo that,” *The Washington Post* (18 August 2020), available at: <https://www.washingtonpost.com/politics/2020/08/18/american-attitudes-toward-covid-19-are-divided-by-party-pandemic-itself-might-undo-that/>; Ted van Green and Alec Tyson, “5 facts about partisan reactions to COVID-19 in the U.S.,” *Pew Research Center* (2 April 2020), available at: <https://www.pewresearch.org/fact-tank/2020/04/02/5-facts-about-partisan-reactions-to-covid-19-in-the-u-s/>.

⁵¹ Claudia Deane, Kim Parker and John Gramlich, “A Year of U.S. Public Opinion on the Coronavirus Pandemic,” *Pew Research Center* (5 March 2021), available at: <https://www.pewresearch.org/2021/03/05/a-year-of-u-s-public-opinion-on-the-coronavirus-pandemic/>.

⁵² Samuel L. Perry, Andrew Whitehead and Joshua B. Grubbs, “Culture Wars and COVID-19 Conduct: Christian Nationalism, Religiosity, and Americans’ Behavior During the Coronavirus Pandemic,” *Journal for the Scientific Study of Religion* 59.3 (2020): 405-16.

⁵³ See, for instance, *Tillis v Manatee County* (Case No. 2020-CA-002849AX) (8 Mar 2020), which was dropped, and more recently, *Resurrection School, et al. v. Elizabeth Hertel, et al.* (Case No. 20-2256) (23 Aug 2021). For discussion, see Leslie Dorrough Smith, “Why masks are a religious issue,” *The Conversation* (4 September 2020), available at: <https://theconversation.com/why-masks-are-a-religious-issue-144391>; John E. Finn, “Freedom of religion doesn’t mean freedom from mask mandates,” *The Conversation* (11 August 2020), available at: <https://theconversation.com/freedom-of-religion-doesnt-mean-freedom-from-mask-mandates-144190>.

⁵⁴ Grace Hauck, “Yes, some Americans may be required to get a COVID-19 vaccine but not by the federal government,” *USA Today* (5 December 2020), available at: <https://www.usatoday.com/story/news/nation/2020/12/05/covid-vaccine-required-government-employers/3797885001>.

⁵⁵ See, for instance, Elle Reeve, Samantha Guff, Theresa Waldrop and Deborah Brunswick, “Many Evangelicals say they won’t be vaccinated against Covid-19. Some experts say distrust and misinformation have played a role,” *CNN* (15 April 2021), available at: <https://edition.cnn.com/2021/04/14/us/covid-vaccine-evangelicals/index.html>; Elizabeth Dias and Ruth Graham, “White Evangelical Resistance is Obstacle in Vaccination Effort,” *New York Times* (5 April 2021), available at: <https://www.nytimes.com/2021/04/05/us/covid-vaccine-evangelicals.html>.

⁵⁶ Reports of such anger appeared across the news media and on social media; see, for instance, Deanna Pan, “I feel so betrayed.’ A church in Fitchburg is at the epicenter of a growing COVID-19 outbreak,” *Boston Globe* (5 November 2020), available at: <https://www.bostonglobe.com/2020/11/05/metro/i-feel-so-betrayed-church-fitchburg-is-epicenter-growing-wacovid-19-outbreak/>.

even heroic, resistance to state power, which serve to boost their legitimacy among adherents and others who share the same ideology.

Constitutional Duties and Communitarianism

Where the constitutional environment eschews rights-litigation, and emphasises instead a more communitarian approach to rights and duties, religious organisations tend to opt for a strategy of cooperation and general compliance with state regulations. This is especially the case where religious organisations are co-opted into the constitutional structure of the state and are the subject of state regulation and management. Co-optation entails the inclusion of religious organisations as part of the governance structure, which could involve subsidising and regulating these organisations, and engaging them as "political partners."⁵⁷ Co-optation could undermine the capacity of a religious organisation to mobilise opposition to the state, while also legitimising state organs.⁵⁸

Singapore provides an illuminating example for such a dynamic. The constitutional environment emphasises community interests. While article 15 of the Singapore Constitution guarantees the right to religious freedom, it is a qualified provision and could be derogated from on the basis of "public order, public health or morality."⁵⁹ Constitutional jurisprudence in Singapore tends to give great weight to public interests, as a counter to constitutional rights.⁶⁰ In a 2016 speech delivered by Chief Justice Sundaresh Menon at the American Law Institute's 93rd Annual Meeting, he observed that Singapore's "fidelity to the rule of law" coexists with "an emphasis on communitarian over individualist values".⁶¹ This emphasis includes a preference for "dialogue, tolerance, compromise and placing [of] the community above self". In addition, the constitutional state-religion arrangement has been described as "muscular secularism",⁶² "secularism as hierarchy"⁶³ of state interests over religious interests, as well as patronage secularism.⁶⁴ These point to the tendency to prioritise state interests over religious rights. Muscular secularism, for instance, points to the uncompromising and immediate use of the law by the state to limit religious freedoms in light of the "sensitivities of living in a multi-religious society" where "all have to live in peace with one another".⁶⁵ Such an approach often involves a degree of co-optation, reflected for instance in Walid Jumblatt Abdullah's examination of MUIS (Islamic Religious Council of Singapore) and Pergas (Singapore Islamic Scholars & Religious Teachers Association), the two most influential Islamic organisations in Singapore.⁶⁶

This constitutional environment underpins the religious organisations' openly supportive and cooperative stance towards state restrictions. Some religious organisations put in place restrictions even before the state-imposed regulations restricted religious services.⁶⁷ The responses of the religious organisations can

⁵⁷ See Tun-jen Cheng and Deborah A. Brown, "Introduction: The Roles of Religious Organisations in Asian Democratisation," in *Religious Organisations and Democratisation: Case Studies from Contemporary Asia*, eds. Tun-jen Cheng and Deborah A. Brown, London & New York: Routledge, 2015, 3-40, 14.

⁵⁸ Ibid; Elina Scheutkler, "A Note on the Determinants of the Regulation of Religion," *Politics and Religion* 9.4 (2016): 744-70, 750-752, 759-762.

⁵⁹ Constitution of the Republic of Singapore, Art. 15.

⁶⁰ See for instance *Colin Chan Hiang Leng v PP* (1994) 3 SLR 662.

⁶¹ Sundaresh Menon, "The Rule of Law: The Path to Exceptionalism," *Singapore Academy Law Journal* 28 (2016): 413-27.

⁶² Kumar Ramakrishna, "Diagnosing 'extremism': the case of 'Muscular' Secularism in Singapore," *Behavioral Sciences of Terrorism and Political Aggression* 11.1 (2019): 26-47, 29.

⁶³ Jaclyn Neo, "Secular Constitutionalism in Singapore: Between Equality and Hierarchy," *Oxford Journal of Law and Religion* 5.3 (2016): 431-56.

⁶⁴ Daniel P.S. Goh, "Legal Pluralism, Patronage Secularism, and the Challenge of Patronage Christianity in Singapore," in *Regulating Religion in Asia: Norms, Modes, and Challenges*, eds. Jaclyn Neo, Arif Jamal and Daniel P.S. Goh, Cambridge: Cambridge University Press, 2019, 256-275, 256.

⁶⁵ Ramakrishna, "Diagnosing 'extremism,'" 29.

⁶⁶ Walid Jumblatt Abdullah, "Religious Representation in Secular Singapore: A Case Study of MUIS and Pergas," *Asian Survey* 53.6 (2013): 1182-204.

⁶⁷ The Catholic Church was among the first to announce closures; on 14 February 2020, more than one month before the government-imposed restrictions on places of worship, the Catholic Church suspended both weekday and weekend public masses. Roman Catholic Archdiocese of Singapore, "Ongoing suspension of masses," (12 March 2020), available at: <https://www.catholic.sg/ongoing-suspension-of-masses/>; Rachel Phua, "COVID-19: Catholic Church suspends mass; other

be framed in terms of addressing what Beyer calls the “*performance problem*”, where religious organisations resist pressures to privatise and retreat from the public sphere by “finding effective religious ‘applications,’ not in more religious commitment and practice.”⁶⁸ Cooperation of religious organisations with public authorities thus offers a solution to this “*performance problem*” since they undertake non-religious responsibilities of communicating relevant information from public authorities to their adherents.⁶⁹ Indeed, one sees this performativity in how religious organisations framed their compliance with Covid-19 restrictions in terms of responsibility to the community and commitment to the common good. For instance, the Archbishop of the Catholic Church issued a statement that “As responsible Catholics, we should be mindful that we do not do anything that might further burden the already strained healthcare system. … as the Head of the Catholic Church in Singapore, I have to decide for the common good.”⁷⁰ The National Council of Churches of Singapore also issued a statement asking Christians and churches to be “responsible members of our society”, and implement necessary precautions.⁷¹ Separately, in his Hari Raya statement, the Mufti of Singapore exhorted Muslims here to see the restrictions as being “about fighting something a lot bigger, it’s about saving lives … to help our country back to where we can restart everything as best we can.”⁷² These statements portray religious organisations as a key part of the community, and emphasise their position as socially responsible institutions.⁷³

This narrative of social responsibility is distinguishable from the narrative of necessity which Kong suggests is employed by religious organisations when faced with restrictions from the state.⁷⁴ The narrative of necessity also employs the idea of a higher good, but can be distinguished from the narrative of social responsibility insofar as necessity is invoked to justify a failure to contest a restrictive action.⁷⁵ In contrast, by taking the initiative in decreasing religious activities and gatherings, religious organisations could present themselves as active participants in advancing public health measures.

This narrative of social responsibility can be said to be tied in with a level of self-interest since religious gatherings had been a source of spread for Covid-19 cases in Singapore.⁷⁶ Compliance was also a way for religious groups to protect their own congregants, as religious organisations in Singapore also urged their members to comply with state measures and provide medically informed advice to their congregants. For instance, the Catholic Church has an Archdiocesan Covid-19 Task Force which works with the Catholic Medical Guild to issue pastoral letters and communications to Singaporean Catholics to provide information about and

religious groups turn to livestreaming, among other measures,” *Channel NewsAsia* (14 February 2020), available at: <https://www.channelnewsasia.com/news/singapore/covid-19-outbreak-coronavirus-catholic-church-religion-singapore-1243582>.

⁶⁸ Peter Beyer, *Religion and Globalisation*, London, Thousand Oaks & New Delhi: SAGE Publications, 1994, 80 (emphasis in the original).

⁶⁹ Holte observes this in relation to religious organisations in Oslo, Norway, see Bjørn Hallstein Holte, “Religion and integration: religious organisations’ communication in a diverse city district of Oslo, Norway,” *Journal of Contemporary Religion* 35.3 (2020): 449-68, 461.

⁷⁰ Roman Catholic Archdiocese of Singapore, “Ongoing suspension of masses.”

⁷¹ National Council of Churches Singapore, “Letter: COVID-19 – DORSCON Orange,” (9 February 2020), available at: <https://nccs.org.sg/wp-content/uploads/2020/02/Novel-Coronavirus-DORSCON-Orange.pdf>.

⁷² Hariz Baharudin, “Coronavirus pandemic: S’pore Mufti urges Muslims to reflect on Ramadan’s core,” *The Straits Times* (22 April 2020), available at: <https://www.straitstimes.com/singapore/spore-mufti-urges-muslims-to-reflect-on-ramadans-core>.

⁷³ That religious institutions must be “prosocial”, especially in their provision of public goods (e.g. social services) and private goods (e.g. relief and peace for individual worshippers), as well as their worshipper’s behaving prosocially towards others in society (e.g. engaging in altruism): see Jesse Lee Preston, Erika Salomon and Ryan S. Ritter, “Religious Prosociality: Personal, Cognitive, and Social Factors,” in *Religion, Personality, and Social Behavior*, ed. Vassilis Saroglou, New York & London: Psychology Press, 2014, 149-169, 159; Ghatak and Abel, “Power/Faith,” 222-27.

⁷⁴ Lily Kong, “Negotiating Conceptions of ‘Sacred Space’: A Case Study of Religious Buildings in Singapore,” *Transactions of the Institute of British Geographers* 18.3 (1993): 342-58, 348.

⁷⁵ Ibid, 352. Interestingly, this rationalisation process mirrors debates in the US concerning religious objects in Court: “Of course, not all religious symbols are religious objects. In fact, behavior, words, events, or ideas may reflect deep religious symbolism… Still, the question of what constitutes a religious object remains. Courts have dealt with such disparate objects as crosses, creches, Ten Commandments monuments, menorahs and Christmas trees. Are all of these items “religious objects”? If so, are all religious objects equally “religious”? See Frank S. Ravitch, “Religious Objects as Legal Subjects,” *Wake Forest Law Review* 40.4 (2005): 1011-86, 1018.

⁷⁶ Timothy Goh and Rei Kurohi, “Grace Assembly coronavirus mystery solved: Antibody tests linked mega cluster to 2 Wuhan tourists via CNY party and Life Church cluster in a world-first,” *The Straits Times* (26 February 2020), available at: <https://www.straitstimes.com/singapore/grace-assembly-coronavirus-mystery-solved-mega-cluster-linked-to-2-wuhan-tourists-via-a>.

justify personal precautionary measures,⁷⁷ changes to the conduct of religious services,⁷⁸ and the reception of Covid-19 vaccines.⁷⁹ This narrative of social responsibility is often underpinned by theological claims. For instance, MUIS issued a fatwa on the theological permissibility of mosque closures⁸⁰ and suspension of Friday congregational prayers where the need arises in the interest of public health and safety.⁸¹

Accordingly, what Daniel Goh calls “patronage secularism” where “a trans-religious state [uses] its secular powers to provide patronage support and protection of religions in the service of nation building”,⁸² could serve the interests of religious organisations as they seek to be included in policy-making.⁸³ At the same time, the social conditions arising from Covid-19 restrictions became a source for organisational innovations as religious organisations pivoted to providing online services, classes, and other events, and expanded their repertoire of online resources.⁸⁴ Innovations also involved the transforming of religious teachings to affirm ideas of spirituality, thus potentially appealing to those who may not consider themselves “religious”, but “spiritual”. For instance, the Catholic church in Singapore prepared a FAQ which emphasises “spiritual communion”⁸⁵ and the Mufti of Singapore issued a statement urging Muslims to reflect on the core idea of Ramadan during the Circuit Breaker period in 2020, emphasising Islam’s spiritual aspect.⁸⁶ Similarly, the Chief Rabbi of Singapore emphasised the “spiritual call of the hour” arising from restrictions, analogising the power of one’s actions in preventing the spread of the virus with their ability to generate “spiritual energy … to spread to the entire world” through dedicated prayer and performance of good deeds.⁸⁷ While digitalisation of religion is not new, this theological shift towards spirituality as a primary, and not merely subsidiary, form of religiosity must be seen as a further transformation of religion.⁸⁸

There was also use of social media to reach followers and to performatively engage in acts of inter-faith solidarity. For instance, the Mufti wrote an open letter to the National Council of Churches to express solidarity during the Easter holiday, stating that the Muslim community “truly empathise with the challenges that the Christian community faces in not being able to celebrate these momentous events in the most ideal way,” invoking a sense of shared experience: “our respective traditions empower us with meaning, values, and lessons that will make us stronger and more resilient in face of adversity.”⁸⁹ For Eid, the Catholic Church sent

⁷⁷ Roman Catholic Archdiocese of Singapore, “Communication to Catholic Laity after report of a Church identified a cluster of the Coronavirus cases” (11 February 2020), available at: <https://www.catholic.sg/communication-to-catholic-laity-2/>.

⁷⁸ Roman Catholic Archdiocese of Singapore, “Pastoral Letter On COVID-19 – Suspension of Masses and Large Gatherings” (14 February 2020), available at: <https://www.catholic.sg/suspension-of-masses/>.

⁷⁹ Roman Catholic Archdiocese of Singapore, “Pastoral Letter on the Morality of COVID-19 Vaccinations” (3 February 2021), available at: <https://www.catholic.sg/pastoral-letter-on-covid-19-vaccine/>.

⁸⁰ Majlis Ugama Islam Singapura, “Fatwa on Precautionary Measures in Dealing with the Covid-19” (18 February 2020), available at: <https://www.muis.gov.sg/officeofthemufti/Fatwa/Fatwa-Covid-19-English>.

⁸¹ Majlis Ugama Islam Singapura, “Fatwa on Friday Prayers During Covid-19 (English)” (16 June 2020), available at: <https://www.muis.gov.sg/officeofthemufti/Fatwa/English-Fatwa-on-Friday-Prayers-during-COVID-19>.

⁸² Goh, “Legal Pluralism, Patronage Secularism, and the Challenge of Patronage Christianity in Singapore,” 256.

⁸³ National Council of Churches of Singapore, “Meeting with Minister of Health Mr Gan Kim Yong – 14 February 2020” (17 February 2020), available at: <https://nccs.org.sg/wp-content/uploads/2020/02/Meeting-with-Minister-of-Health-20200217.pdf>; Ministry of Health, “Meeting with Religious Leaders on Covid-19” (17 February 2020), available at: <https://www.moh.gov.sg/news-highlights/details/meeting-with-religious-leaders-on-covid-19>.

⁸⁴ Jan Lee, “New face of worship: Virtual getai shows and Zoom dharma lessons for Taoists, Buddhists,” *The Straits Times* (19 July 2020), available at: <https://www.straitstimes.com/lifestyle/taoists-buddhists-virtual-getai-shows-and-zoom-dharma-lessons>.

⁸⁵ Roman Catholic Archdiocese of Singapore, “FAQ – What is a Spiritual Communion?” (8 October 2020), available at: <https://www.catholic.sg/faqs-on-resumption-of-mass-on-phase-ii/>.

⁸⁶ Baharudin, “Coronavirus pandemic.”

⁸⁷ The Jewish Welfare Board, “Important Update on Covid-19” (13 March 2020), available at:

<https://www.singaporejews.com/media/attachments/2020/03/15/covid-19---singapore-chief-rabbis-message-mar-13-2020.pdf>.

⁸⁸ This is occurring worldwide. Even in the United States, religious organisations have sought to innovate and to emphasise spirituality over physical presence. As the National Association of Evangelicals stated, “the church can be the church outside the walls of the sanctuary.” Walter Kim and Timothy Dalrymple, “To Cancel or Not to Cancel: That Is the Question,” *Christianity Today* (23 March 2020), available at: <https://www.christianitytoday.com/ct/2020/march-web-only/walter-kim-nae-timothy-dalrymple-cancel-church-or-not.html>.

⁸⁹ See for instance National Churches Council of Singapore, “Mufti Letter to NCCS (for Holy Week, Good Friday and Easter Sunday)” (8 April 2020), available at: <https://nccs.org.sg/correspondence/mufti-letter-to-nccs/>; Roman Catholic Archdiocese of Singapore, “Hari Raya 2019 Message” (29 May 2019), available at: <https://www.catholic.sg/hari-raya-message-2019/>.

open greetings, declaring empathy for Muslims who could not regularly worship in the mosques “as a people of God” or undertake pilgrimages, and pointed to their shared traditions of “prayer, fasting and almsgiving”.⁹⁰ Such open displays of inter-faith and interreligious solidarity serves to emphasise the role of religion in society and to demonstrate religious organisations as committed to religious harmony.⁹¹ The narrative of social responsibility has the further potential of enhancing the legitimacy of religion in society.

Conclusion

In general, Covid-19 restrictions raise multifarious considerations where conventional civil-political rights can be said to come up against non-conventional, but no less important, rights including an expansive right to life, to health, to an adequate standard of living, and to work.⁹² These restrictions have, in some instances, brought to the fore latent tensions between state and religious organisations. In some other instances, Covid-19 has done the opposite, highlighting the de facto close relationship between the two. In yet other instances, it has shown the dominance of religious influence over state power.⁹³ Religious organisations responded differently to restrictions on religious gatherings, with varying outcomes. The constitutional environment is one significant factor influencing how religious organisations react to the restrictions on their activities and gatherings, specifically whether these organisations protest or comply, and how their chosen course of action would enhance their social legitimacy.

⁹⁰ Roman Catholic Archdiocese of Singapore, “Hari Raya Message 2020” (17 May 2020), available at: <https://www.catholic.sg/hari-raya-message-2020/>.

⁹¹ See Gathak and Abel, “Power/Faith,” 223, 225-226, citing Roy A. Rappaport, *Ritual and Religion in the Making of Humanity*, Cambridge: Cambridge University Press, 1999.

⁹² Christopher McCrudden, “Democracy, Protests, and Covid-19: The Challenge of (and for) Human Rights,” *United Kingdom Constitutional Law Association* (19 June 2020), available at: <https://ukconstitutionallaw.org/2020/06/19/christopher-mccrudden-democracy-protests-and-covid-19-the-challenge-of-and-for-human-rights/>.

⁹³ See, for instance, how Muslim groups vehemently and successfully opposed state measures in Pakistan: Imran Ahmed, “The Politics of Congregational Prayer: Trust, Public Health, and Religious Authority in Pakistan,” *Journal of Law, Religion, & State* 8.2/3 (2020): 251-71.

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About the Authors

Jaclyn Neo is an Associate Professor and the Director of the Centre for Asian Legal Studies at the National University of Singapore (NUS) Faculty of Law. A graduate of the NUS Faculty of Law (LLB) and Yale Law School (LLM and JSD), she is the recipient of multiple academic scholarships, competitive research grants, and research awards. Jaclyn has published in leading journals in her field, and has published and edited six books and five special issues. Jaclyn currently sits on the editorial board of the *Asian Journal of Comparative Law*, the *International Journal of Constitutional Law Blog (ICONnect)*, the *Asian Yearbook of International Law*, the *Journal of Law and Religion*, and *Suprema (Revista de Estudos Constitucionais)*. She has held visiting positions at Frankfurt University, University of Münster, University of Trento, Melbourne Law School, the Max Planck Institute for the Study of Religious and Ethnic Diversity, as well as the Princeton School of Public and International Affairs. Jaclyn serves on the Singapore Academy of Law Reform Committee as well as the Executive Committee of the ASEAN Law Association (Singapore), and is a Professorial Fellow with the Attorney-General Chambers (AGC) Academy.

Shazny Ramlan is a Research Associate with the NUS Faculty of Law and concurrently serves as the Managing Editor of the *Asian Journal of Comparative Law*. Prior to his current appointment, Shazny graduated from NUS Faculty of Law in 2018 and was a Research Assistant with the NUS Centre for Asian Legal Studies. As a scholar of environmental law and religion, he has contributed to *Comparative Environmental Law and Regulation* (Thomson Reuters, 2018) and most recently published an article with *the Asia Pacific Journal of Environmental Law*. His forthcoming works include a volume on Islamic law in Singapore (under contract with LexisNexis Singapore) and chapters in a volume on Islamic environmental protection and water resources law (under contract with Universiti Kebangsaan Malaysia Press).

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SCHOOL OF
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Nanyang Technological University, Singapore

Nanyang Technological University, Singapore

Block S4, Level B3, 50 Nanyang Avenue, Singapore 639798

Tel: +65 6790 6982 | Fax: +65 6794 0617 | www.rsis.edu.sg