

Governing Board, Uppsala, 21 – 23 May 2026
Agenda Item: 15
Document Name:
1GB2026_DOC15C CEC EXPLORATORY REPORT FORB IN THE EU
Purpose: For reception

Exploratory Report

Freedom of Religion or Belief in the EU

Summary

This report presents key observations from my first months working at the Conference of European Churches, based on participation in meetings, events, and exchanges with civil society actors, EU institutions, and Freedom of Religion and Belief (FoRB) stakeholders in Brussels and online. It reflects on observations related to FoRB in the European Union, my engagement within the Pathways to Peace (P2P) project, and broader advocacy work with European institutions.

Key observations on FoRB in the European Union

- **EU Anti-Racism and Antisemitism Strategies**

The new Anti-Racism Strategy from the EU Commission adopts an intersectional approach, relevant for FoRB-related discrimination. The Antisemitism Strategy highlights rising antisemitic incidents and links antisemitism to broader threats to democracy and pluralism. Both strategies create opportunities for dialogue with EU institutions to ensure FoRB receives adequate attention.

- **Hate speech and hate crime legislation**

Proposed extension of EU crimes under Article 83 TFEU includes religion or belief. Offers potential protection against religion-based hatred. However, it also raises concerns about safeguarding freedom of expression and legitimate religious speech.

Political dynamics shaping FoRB debates

- **Politicisation and Instrumentalisation of FoRB**

FoRB has increasingly become associated with the political right, leading to a polarised policy environment in which related issues, such as anti-racism, are discussed largely in separate political spaces. This division risks weakening FoRB as a shared and universal human rights concern. Simultaneously, FoRB and Christian identity are being instrumentalised by certain actors to promote exclusionary or fear-based narratives, particularly towards Muslims, migrants, and progressive social movements. This instrumentalisation undermines FoRB's universality, fuels social polarisation, and risks damaging the credibility of church-based actors such as CEC.

Engagement beyond the European Union

- **Council of Europe**

Different than the EU, CEC's relationship with the Council of Europe (CoE) is not as strong as it was before the office closed in Strasbourg. CEC therefore needs to continue to

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rebuild its relationship with the CoE. We continue to participate in interreligious and interconvictional dialogue structures. We have renewed our entitlement to lodge collective complaints under the social charter at the European Court of Human Rights.

- **Organization for Security and Co-operation in Europe (OSCE)**
CEC actively engages with the OSCE and their Office for Democratic Institutions and Human Rights (ODIHR) on FoRB-related issues. Cooperation on cases such as Armenia and participation in conferences on anti-Christian hate crimes.

Pathways to Peace (P2P)

- **Protection of Holy Sites in Ukraine**
The destruction, takeover, and repurposing of religious sites underscore the importance of protecting holy sites as places of worship, community, humanitarian support, and identity.
- **Legal FoRB Challenges**
Legal developments affecting the Ukrainian Orthodox Church (Moscow Patriarchate) and a similar situation in Estonia raise complex questions at the intersection of FoRB, national security, and international advocacy, calling for a coherent and carefully considered approach by CEC.

Recommendation

- **Human Rights (FoRB) Steering Group**
We propose to establish a steering group out of a diverse group of experts from CEC's Member Churches to discuss and develop further on the concrete work on human rights, and specifically FoRB.

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Introduction

This report presents observations from my first months working at the Conference of European Churches, based on conversations with civil society, experts, and European institutions through meetings, events, and online exchanges. These interactions have informed my understanding of current Freedom of Religion or Belief (FoRB) debates within the EU policy environment, as well as FoRB-related challenges in the context of Ukraine.

Antisemitism, anti-Muslim hatred, violence against religious communities, and the politicisation of religion continue to affect the ability of individuals and communities to live and practise their faith freely and safely. At the same time, FoRB is increasingly addressed indirectly within broader European policy frameworks, such as equality, anti-discrimination, hate crime and security agendas, rather than as a standalone issue.

This report provides an overview of current FoRB-related engagement with EU institutions, the Council of Europe and the OSCE, followed by a reflection on broader political dynamics shaping FoRB debates, including politicisation and instrumentalisation. It also highlights specific areas of work under the Pathways to Peace programme in which I will engage.

1. Freedom of Religion or Belief in Current EU Policy Frameworks

A big part of my work is towards the EU institutions in Brussels. The current engagement with the EU is active. In the last months I have attended several meetings and events which has been helpful to make connections and talk about several concerns. Currently we are trying to get a better engagement with the chairs of the Subcommittee on Human Rights (DROI). The contact with the EU Commission is a bit more challenging. This is an issue that other organisations struggle with as well. By taking part in networks such as the Human Rights Democracy Network (HRDN) and by tapping into already existing policy frameworks I hope to improve this. Nonetheless, CEC has generally contact with some high-level EU Officials to bring awareness to issues that CEC is concerned about. For instance, we were able to bring awareness to the imprisonment of a member of the Sophia brotherhood by Russia to the head of the European External Action Service, President of the European Council and to different commissioners.

Within the European Union, FoRB is rarely addressed as an isolated policy field in EU internal action. Instead, it is increasingly embedded in wider strategies such as equality, non-discrimination or hate crime. As a result, it is crucial for CEC to know what is being prepared, what is being implemented and what is already set in place. In this chapter I will briefly describe these policies by the different EU institutions.

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1.1 The EU Anti-Racism Strategy

One of the most recent initiatives that is implemented is the EU Anti-Racism Strategy. It represents the first comprehensive EU-level framework to address racism and racial discrimination in a structural manner. It was officially implemented at the beginning of this year. The strategy explicitly adopts an intersectional approach to racism, recognising that discrimination is not only based on race, but also on the basis of “colour, language, religion, nationality or national or ethnic origin.”

For FoRB, the relevance of this strategy lies in the fact that many religious communities experience discrimination not as religion alone, but precisely at the intersection of religious identity, ethnicity, migration status, and visibility. Jewish communities, Muslims, Roma Christians and other minorities are often affected by forms of exclusion that cannot be neatly separated into “religious” categories. The Anti-Racism Action Plan could therefore function as a framework addressing significant FoRB-related challenges within the EU. Unfortunately, the focus does not seem to lie on the religious aspect of racism. Little attention was given to this in both the report and the launch presentations.

Therefore, for CEC, this policy area presents opportunities. Since the strategy is still freshly implemented, it provides space for dialogue with the institutions to improve the implementation. To make sure racism and discrimination based on religion or belief receives enough attention.

1.2 EU Strategy on Combating Antisemitism and Fostering Jewish Life

The EU Strategy on Combating Antisemitism and Fostering Jewish Life (2021–2030) is one of the most explicit religion-specific initiative within the EU’s internal action. Adopted in 2021, it addresses the prevention of antisemitism, the protection of Jewish life, and education and Holocaust remembrance. In its first progress report in October 2024, the European Commission noted a significant rise in antisemitic incidents across the EU, including attacks against individuals, threats to places of worship and widespread online hatred, framing antisemitism as a challenge to democracy, pluralism and fundamental rights.

These developments must also be understood in the context of heightened polarisation following the war in Gaza, which has contributed to a sharp increase in antisemitic incidents and hostile rhetoric within Europe. More broadly, threats to freedom of religion or belief arise from different ideological directions. Antisemitic narratives maintain present among Islamist extremists and far-right movements, as well as strongly anti-religious positions occasionally associated with the far left.

For CEC, the EU’s antisemitism strategy is another opportunity to engage with the EU Commission to raise specific issues related to violations of FoRB towards the Jewish community. This could be done for instance towards the special coordinator of antisemitism at the EU Commission.

1.3 Hate Speech, Hate Crime and FoRB Challenges Facing Churches in Europe

A proposal by the EU Commission is to extend the list of EU crimes under Article 83 TFEU to include hate speech and hate crime. The initiative explicitly covers hatred directed against protected

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grounds such as religion or belief and remains under negotiation in the Council and the European Parliament.

This dossier is particularly relevant for FoRB, as it concerns the boundary between legitimate freedom of expression, including religious speech and preaching, and unlawful incitement to hatred or violence. While stronger EU action against religion-based hate crime is broadly supported, debates have highlighted the risk that overly broad or imprecise definitions could unintentionally constrain religious discourse and free speech in general.

Thus, this proposal provides both opportunities and caution. This extension could provide direct consequences of hateful speech and acts, something churches in Europe also struggle with.¹ Nonetheless, it can also be used against Christians and followers of other religions or beliefs who try to profess (controversial) statements based on their faith which could be interpreted as hateful. Lastly, like the fight against antisemitism, the Commission has established a coordinator to combat anti-Muslim Hate crimes. Although this position has been established before the proposal to make hate crimes punishable by law, the coordinator actively advocates to reduce anti-Muslim hatred. Like the coordinator for antisemitism, CEC can work together with the coordinator to support each other's work on combating hate crimes.

1.4 Special Envoy on FoRB and the Parliamentary Intergroup on FoRB

In 2026, the European Commission appointed a new Special Envoy for the promotion of Freedom of Religion or Belief outside the EU, Ms Mairead McGuinness. The lengthy appointment process, together with reports that the role may be part-time or limited in scope, raises questions about the priority currently given to FoRB within the Commission. In parallel, the European Parliament Intergroup on FoRB has for some time provided a platform to raise FoRB-related concerns, although its discussions have often focused primarily on violations occurring outside the EU.

These developments raise an important question for CEC. While CEC represents churches within geographical Europe, it must consider to what extent, and in what ways, it should also engage in advocacy concerning FoRB violations affecting Christians elsewhere. Many organisations are already active in bringing FoRB concerns outside the EU to the attention of EU institutions. CEC nevertheless brings a distinct perspective through its representation of churches in Europe and its ecumenical relations beyond Europe. Moreover, different members of CEC have ecclesial relations with churches outside Europe and might be concerned about them. The challenge lies in identifying how CEC can add value without duplicating existing efforts or diverting attention from FoRB challenges within Europe.

At the same time, even if CEC were to focus primarily on the geographical area of its Member Churches, the work of the Intergroup on FoRB and the Special Envoy remains directly relevant. CEC also represents Member Churches outside the EU, whose situations can be raised within these EU-level frameworks. Cases such as the situation of the Armenian churches or FoRB violations

¹ Some organisations have drawn attention to alleged or real violations of FoRB against Christians including cases involving CEC Member Churches. Although no formal requests for support have been submitted to CEC. COMECE is therefore advocating for a coordinator on anti-Christian hate crimes.

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related to the war in Ukraine illustrate how these mechanisms can provide additional channels for visibility, coordination and advocacy.

2. Other International Institutions

Besides working with the different EU actors, CEC also engages with other intergovernmental organisations, mainly the Council of Europe (CoE) and the Organization for Security and Co-operation in Europe (OSCE).

2.1 Council of Europe

Since CEC closed its office in Strasbourg the focus has mainly shifted to the Brussels based institutions. We therefore have to build up and strengthen the relationships with the CoE. CEC is already taking part in the committee for interreligious & interconvictional Dialogue. This has brought some interactions with the CoE; however, more work is needed.

Generally, CEC is still registered as an INGO at the CoE and we recently renewed our entitlement to lodge collective complaints under the Social Charter at the European Court of Human Rights. Similarly to the EU we are also able to bring awareness to different issues to different officials at the CoE.

2.2 Organization for Security and Co-operation in Europe

The engagement with the OSCE has been quite active since I started working for CEC. We have been in contact with the ODIHR, the human rights branch of the organisation. I have been able to exchange e-mails with the head of the human rights department, Susan Kerr and I have already met online with the associate officer on FoRB, Delia Nita. This contact has been helpful in bringing attention at the OSCE to the situation in Armenia. We have also been able to assist the OSCE in getting into contacts with our member churches in Poland to invite them for a conference on gender-based violence.

Previously, CEC has taken part in events organised by the OSCE/ODIHR and we continue to do so. For instance, in June I am speaking on a conference organised by the OSCE on anti-Christian hate crimes.

3. Politicisation and Instrumentalisation of FoRB and Christianity

A recurring observation in current EU-level debates is that FoRB has increasingly become politicised and associated with specific political actors and narratives. FoRB is often perceived as a topic primarily taken up by right-wing parties and organisations, a perception reflected, for example, in the composition and activities of the European Parliament Intergroup on FoRB, where representation from left-wing political groups is limited. Participation of left-leaning MEPs in FoRB-related events is likewise often strikingly low.

At the same time, it would be inaccurate to conclude that left-wing actors are generally uninterested in FoRB. Closely related issues, such as anti-racism, discrimination and anti-Muslim hatred, are actively addressed in political spaces dominated by left-leaning parties, notably within the EP Intergroup on Anti-Racism and Diversity. These issues are interconnected with FoRB, yet

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the debates frequently unfold in parallel political arenas with little overlap. This separation suggests less a lack of concern than a polarisation of topics, in which FoRB and anti-racism have come to be associated with different political identities and narratives.

This politicisation is further reinforced by the instrumentalisation of FoRB, particularly by certain right-wing actors. In this context, FoRB violations against Christians outside Europe are sometimes selectively highlighted to argue against migration or to portray Islam as incompatible with European values. Christianity is framed as inherently “European”, while religious minorities, especially Muslims, are presented as foreign, threatening or culturally incompatible. Although such framings are not always explicit, they recur through rhetoric and policy debates that contribute to exclusionary or discriminatory attitudes and, in some cases, to violations of FoRB affecting religious minorities within Europe.²

Christianity is also mobilised in opposition to social and ethical developments, notably in debates on abortion and LGBTQI+ rights. While expressing religiously informed ethical positions is legitimate, tensions arise when these positions are articulated through provocative or exclusionary rhetoric that denies the equal dignity of others. Where such statements attract criticism or legal consequences, they are frequently framed as evidence of FoRB or freedom of expression violations against Christians. Although some cases raise legitimate questions, they are not always substantiated and are often used to reinforce broader narratives portraying Christians as persecuted within Europe.

Together, these dynamics pose significant challenges for FoRB advocacy. Politicisation and instrumentalisation risk reducing FoRB to a selective or ideological concept rather than a universal human right. They also complicate the work of organisations such as CEC, as Christianity becomes associated with exclusionary narratives that damage social cohesion, weaken democratic values and undermine the credibility of Christian engagement on human rights. More broadly, when FoRB is used to justify discriminatory practices or fear-based politics, real FoRB violations risk being obscured or relativised.

For CEC, acknowledging and addressing these dynamics is essential. Advocacy on FoRB must remain non-selective, grounded in human dignity and attentive to the ways in which religion can be misused politically. This requires careful positioning: taking genuine FoRB concerns seriously, including those affecting Christians, while resisting polarisation and rejecting instrumental use of FoRB and Christianity that undermines the rights of others.

4. Pathways To Peace

Immediately after I started working at CEC, I have actively been briefed on the work of P2P. I believe I have been updated as much I could so that I can actively involve myself on the work of P2P. There are two main issues which I will focus on in P2P; the destruction of holy sites and legal FoRB issues both in Ukraine and outside of Ukraine.

² For example, I have heard belittling remarks about serving halal food in school canteens during an EP meeting, linking it with actions of the Muslim Brotherhood.

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4.1 Protection of Holy Sites

CEC has stressed the importance of protecting holy sites in Ukraine since the beginning of the Russian full-scale invasion in Ukraine making it the second objection of the pathways to peace project. The protection of holy sites is important, not only because these are the places where religious people come together to practice their faith. Indeed, holy sites are multifunctional. They are often used as places of shelter against shelling, spaces of education or registered places for providing humanitarian aid providers. Moreover, religious sites are also places in which communities are being formed and maintained. In other words, the protection of holy sites is vital for local communities and the nation as whole.

4.2 Legal FoRB Challenges

Since the beginning of the full-scale Russian invasion of Ukraine in 2022, Ukrainian authorities have increasingly viewed the Ukrainian Orthodox Church (UOC), associated historically with the Moscow Patriarchate (UOC-MP), as a potential national-security risk. This view is not entirely strange since the UOC has (had) long lasting canonical ties to the Russian Orthodox Church (ROC) which supports Russian state interests, including the full-scale invasion.

In response, Ukraine has introduced a series of legislative and administrative measures aimed at limiting, regulating, or dissolving organisations considered affiliated with Moscow. Currently the Ukrainian parliament adopted a bill which establishes seven criteria of affiliation with the Russian Orthodox Church, effectively making it possible to dissolve the UOC without naming it explicitly. On 24 August 2024, President Zelensky signed this document. In short, the law empowers the State Service for Ethnopolitics and Freedom of Conscience (DESS) to investigate religious organisations suspected of cooperation with the ROC. Recently the process of creating the foundation of these legislations have been tested in court by the OCU. The judges decided that the state authority has indeed ignored a serious procedural objection, conducted an unfair process, and issued an unlawful order. Consequently, they have annulled the state order that the UOC still has links with the Moscow Patriarch. The impact of this decision is currently still not clear. Similarly, Estonia is creating specific laws to target the Estonian Orthodox Church which has connections with the Moscow Patriarch. Like Ukraine, they argue that the church is forming a risk for the national security. Although there might be some truth in this, one could be critical about the approach of the Estonian government and the possible violations of FoRB and other human rights.

5. Other Human Rights

Besides working on FoRB, other human rights have come up in the work as well. Main topics that have come up include LGBTQI+ rights, gender-based violence and anti-racism. These are very important topics that once again ask for CEC's attention, yet not its main focus. Nonetheless, it does bring up the question how CEC should approach these topics. So far, I have been open to learn about different human rights topics yet have not actively started any works on it. In meetings I have expressed that I am open to learn, but that other human rights do not have our main attention and that we will have to see case by case how we respond.

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However, FoRB as a human right is closely intertwined with other human rights, such as freedom of assembly and freedom of expression. This intersection should also be explored while advocating for other human rights, such as women's rights. Besides this, intersections of FoRB and other human rights also encourage CEC to keep an open perspective towards legislation that might not directly discusses FoRB issues, yet might still have FoRB aspects, such as legislation on healthcare.

6. Possible Approaches

To finish this report, I would like to briefly introduce some possible approaches CEC could take. These approaches can be discussed with a steering group on FoRB and human rights which we propose to establish out of a diverse group of experts from CEC's Member Churches.

To start, CEC should approach the topic of FoRB from a human rights point of view. Meaning that FoRB is seen as a human right that equally applies to every human being. When CEC advocates FoRB to the political institutions it should therefore be done using primary understandable human rights language. Nonetheless, it is because of the profound Christian faith of shared human dignity while being created in the Imago Dei which CEC has professed not only in the Uppsala Report but also in the recently updated Charta Oecumenica, which brings CEC to its position on FoRB and more broadly human rights.

To address the politicisation and instrumentalisation of FoRB, CEC could take different approaches focused on dialogue, bridge-building, and interfaith cooperation:

- **Strengthen spaces of dialogue at multiple levels**
Support interreligious dialogue not only at the high level in Brussels and Strasbourg, but also within local communities where polarisation often takes root. In cooperation with other faith groups and organisations, CEC can help create inclusive spaces that foster mutual understanding and address misconceptions around FoRB and anti-racism.
- **Bridge political divides through joint initiatives**
Co-organise events with NGOs and policymakers that bring together actors from across the political spectrum. By linking FoRB and anti-racism, CEC can contribute to more balanced and constructive political discussions.
- **Challenge harmful narratives and promote alternatives**
Similar to how CEC addressed the false Russian World ideology which uses the Christian faith to justify the war on Ukraine, CEC can address the hateful ideology that uses Christianity to justify harmful practices towards minority groups. Simultaneously, CEC can promote theologically grounded counter-narratives.
- **Strengthen collaboration with other faith communities**
Deepen and maintain partnerships with Jewish, Muslim, and other religious actors through regular meetings to address shared challenges such as antisemitism and anti-

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Muslim hatred. Visible cooperation can both counter stereotypes and demonstrate that CEC's engagement with FoRB is inclusive rather than exclusionary.

Lastly, the FoRB work of P2P will continue through the steering group of P2P. Ideas to address the protection of holy sites are exhibition on holy sites in the European Parliament perhaps in partnership with "religion on fire" and advocating for the importance of rebuilding holy sites to funders of Ukraine.³ To address the legal FoRB questions, CEC should first try to create an internal CEC perspective on the dynamic and tension between national security and human rights. Based on this perspective CEC could continue with advocacy work and engage in dialogue with DESS.

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³ An example of such an exhibition can be found on the website of the Europe House in Serbia: <https://europa.rs/exhibition-on-the-destruction-of-religious-sites-in-ukraine-opened/?lang=en>. Religion on Fire keeps track of damaged and destructed holy sites in Ukraine. Their work can be found here: <https://www.mar.in.ua/en/religion-on-fire/>.