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RATIONALES, CATEGORIES, SOLUTIONS, AND CONSTRAINTS IN THE MANAGEMENT OF LINGUISTIC DIVERSITY FROM LANGUAGE TO RELIGION … AND BACK?

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Abstract: This paper offers a comprehensive examination of issues related to linguistic justice, minority language arrangements. It explores the underlying reasons for extending linguistic protections, encompassing both instrumental needs and identity–based arguments. It compares territorial and non–territorial approaches related to the implementation of minority language rights. It focuses on the evolving definitions of linguistic minorities, underlining emerging perspectives on self–identification, multilingual belongings and hybrid identities.

Against this conceptual background, the paper aims to draw parallels between linguistic and religious diversity, exploring similarities and differences in accommodating these domains and discussing the limits in the implementation of minority rights in both linguistic and religious contexts. For instance, as hybrid and multiple identities become increasingly prevalent with globalization and migration, accommodating these fluid identities poses ongoing challenges for autonomy regimes. Nevertheless, the integration of religious and linguistic studies offers an innovative framework for understanding these dynamics.

Ultimately, the paper underscores the need for nuanced, inclusive policies that accommodate linguistic and religious diversity while embracing sociocultural complexities. Achieving true equality in these domains may require rejecting rigid classifications in favor of adaptable solutions tailored to local contexts. The constant reevaluation of policies and the broadening notions of belonging offer a path towards inclusive societies that can effectively respect fundamental human rights and cultural freedoms.

Il presente articolo offre un esame approfondito delle questioni relative alla giustizia linguistica e alla tutela delle minoranze linguistiche, esplorando le motivazioni strumentali e identitarie alla base dell'estensione dei diritti linguistici, confrontando i concetti di territorialità e non–territorialità nella loro implementazione, e riflettendo sull'evoluzione della definizione di minoranza linguistica sullo sfondo di prospettive emergenti in termini di identificazione, appartenenza e identità.

Su questa base concettuale, l'articolo traccia quindi una serie di parallelismi tra diversità linguistica e religiosa, esplorando similitudini, differenze, limiti e sinergie nell'implementazione dei diritti delle minoranze sia in contesti linguistici sia religiosi. Ad esempio, se dinamiche migratorie e globalizzanti aumentano la presenza e rilevanza di identità ibride e multiple, accogliere queste fluidità di appartenenza pone sfide continue alla definizione e attuazione di regimi di autonomia. In questo contesto, l'integrazione degli studi religiosi e linguistici può offrire un quadro innovativo per la comprensione di queste dinamiche.

In definitiva, l'articolo evidenza la necessità di politiche flessibili ed inclusive che accolgano la diversità linguistica e religiosa, abbracciando le relative complessità socioculturali. Il raggiungimento di una vera uguaglianza in questi ambiti può richiedere il superamento di classificazioni rigide a favore di soluzioni adattabili ai contesti locali. La costante rivalutazione delle misure messe in campo e l'ampliamento dei concetti e delle categorie usate nella loro implementazione possono offrire un percorso verso società più inclusive, capaci di rispettare efficacemente i diritti fondamentali e le libertà culturali.

Keywords: Language Rights, Minority Rights, Autonomy, Multilingualism, Hybridity.

Parole chiave: Diritti linguistici, Diritti delle minoranze, Autonomia, Multilinguismo, Ibridità.

Language lies at the heart of human culture, identity, and social interaction. However, this diversity has also long been a source of social friction, hierarchies, and marginalization when certain languages and their speaker communities have been privileged over others. In this socio–cultural and political context, the topic of linguistic justice – how societies can equitably recognize and accommodate multiple languages within their borders, and the debate about inclusive linguistic recognition through autonomy arrangements have gained extensive scholarly attention. They represent a crucial challenge for policymakers aiming to build inclusive societies that respect fundamental human rights and cultural freedoms.

This paper provides a comprehensive exploration of the key issues surrounding linguistic justice, linguistic minority arrangements and language rights. It first examines the underlying rationales that have been put forth for extending linguistic protections, encompassing both instrumental reasons focused on communication access as well as

identity–based arguments centered on human rights, dignity, and cultural belonging (why?). The paper then delves into the complex question of how linguistic justice can be operationalized through different policies and legal mechanisms. It compares the principles of territoriality (granting linguistic rules to defined geographic areas) and personality (allowing individual linguistic freedoms across locations), while recognizing these as idealized concepts that often intersect in real–world policies implemented at multiple scales of governance (how?). A central focus is how the very definitions of "minorities" and their associated linguistic rights continue to evolve with societal changes (who?). The paper explores emerging perspectives on principles like self–identification, hybrid identities, and inclusive approaches aimed at reconciling the claims of traditional minorities and immigrant communities, while also examining the political process of language standardization (what?).

The final aim of the paper is trying to draw parallels between the debates around linguistic diversity and those concerning the accommodation of religious diversity through the identification of similar and different rationales and mechanisms in how these domains have been addressed. By synthesizing the latest interdisciplinary academic discourse on these issues, this paper provides an overview and analysis of the complex considerations involved in recognizing and fostering linguistic and religious diversity in the modern, pluralistic societies shaped by globalized migration and evolving identities.

1. Why?

In a linguistically diverse environment, individuals must often select a language for interaction, a decision that tends to be asymmetrical, favoring one language over others. When this process becomes systematic, it can be likened to situations where members of a particular caste or gender consistently need to defer when encountering individuals from another group (Van Parijs 2011, p. 119). Hence, from a multicultural standpoint, linguistic justice entails safeguarding the linguistic rights of minority groups, ensuring their ability to use their language(s) in

the public sphere to counteract the injustice and inequality that would arise if they were compelled to adopt another language (Alcalde 2018, p. 70). But, why?

A preliminary question to the debate on linguistic justice is that pertaining the value of languages. Essentially, all scholars agree that languages hold significance to people due to their instrumental communicative value, facilitating access to democratic deliberation, mobility within or beyond a state, and enhanced socioeconomic opportunities (Barry 2001; Pogge 2003; Weinstock 2003). In addition, some authors have argued that languages also entail an identity–related value mainly associated with individual autonomy to cultural belonging and parity of esteem or dignity (Kymlicka 2001; Van Parijs 2011; De Schutter 2023)[1]. These two dimensions have been referred to, respectively, as instrumentalism and constitutivism (De Schutter 2007), or cost–benefit approach and rights–based approach (Reáume and Pinto 2012).

However, authors like De Schutter (2007) and Riera Gil (2016, p. 30), among others, have suggested a second dichotomy between monist approaches, "which reinforce the normative ideal of the convergence on a single common language within states (or sub–states)", and pluralist approaches, "based on the equal treatment (or recognition) of individuals as members of different language groups coexisting in a polity".

In fact, both instrumental and identity–related dimensions have been utilized within a monist approach to endorse monolingual policies and regimes. This includes favoring the exclusive use of the majority language (Barry 2011) or advocating for the division of the territory into monolingual autonomous units. For instance, Van Parijs (2011, p. 147) advocates a territorially differentiated coercive regime that would make it possible "for each local language to be and legitimately remain a *queen*, or at least a *princess*, within the linguistic borders assigned to it by the regime"[2]. In order to justify this preference

(1) However, it is important to differentiate the identity–related value from the intrinsic value, which asserts that cultures or languages are *per se* morally valuable, despite and beyond the value(s) that members of specific cultural groups or speakers of specific languages may attach to them. Notwithstanding this further category, it has been noted that "the vast majority of existing political philosophies of linguistic justice do not rest on the idea of intrinsic value" (De Schutter and Robichaud 2015, p. 93; Musschenga 1998).

(2) Van Parijs prefers the term "princess" since he also advocates the use of English as a global *lingua franca*.

he describes a "kindness–driven agony" of weaker languages: if individuals have gained some degree of bilingualism, that is, "if they master the language they are addressed in, even if this language is dominant and a threat to their vernacular language, and even if they have *the right* to an interaction in their vernacular language, they will act nicely and switch to their second language" (De Schutter and Robichaud 2015, p. 102), even though this means reducing the need of learning and using the minority language. In other words, Van Parijs dismisses pluralist approaches since they will either be too demanding (if requiring widespread bilingualism) or inadequate to prevent the "kindness–driven agony" of local languages in private everyday interactions. Furthermore, Van Parijs rejects the idea of non–territorial autonomy (NTA)(3) because, in his opinion, linguistic communities would end up living "side by side in an apartheid–like set up, with separate schools, associations, and media" (Van Parijs 2011, p. 148). NTA would also hamper the development of a fair and cohesive society, since "each of the cohabiting political communities will have great difficulty articulating a coherent political vision of its future as countless space–related interdependencies will constantly force them to negotiate with each other" (Van Parijs 2011, p. 148). Finally, Van Parijs addresses language claims only of national/local minorities and ignores issues related to immigrant languages. Indeed, since the envisaged territorial differentiated coercive regime would have a global dimension, linguistic justice would be guaranteed by territorial reciprocity: "those who expect immigrants to adjust to their own language must simply accept that, if they were ever to settle in a territory, big or small, rich or poor, in which the immigrants' language operates as the official language, they will similarly adjust" (Van Parijs 2011, p. 149).

Monist views, such as that of Van Parijs, have been challenged by pluralist approaches supporting that "recognition of languages on the grounds of identity […] should be egalitarian, so different languages merit recognition on both at the substate and state level". Pluralist views therefore advocate for institutional bi–/multilingualism at both state and substate level as a tool to address issues related to linguistic

(3) See below a more detailed discussion on the differences between territorial autonomy (TA) and NTA.

mixture, that is, situations where "different language groups live intermingled, mainly because long–settled national minorities have survived the linguistic assimilation processes, but also because migrants have adopted the languages of host countries without abandoning their languages of origin" (Riera Gil 2016, p. 54). These instances "may imply significant levels of individual bilingualism in a *demos*, as well as the coexistence of individuals with different linguistic abilities and different patterns of linguistic identity" (Riera Gil 2016, p. 54).

Indeed, plurilingual individuals possess a unique linguistic configuration where multiple systems coexist and interact (Grojean 1989; García and Wei 2014). In this context, monolingual perspectives may lead bilingual individuals to underestimate their language abilities, potentially contributing to language loss (Winsler *et al.* 2014). Accordingly, the divide between monism and pluralism reflects another long–established dichotomy, that is that between *transparent* or *discrete* language ideologies and a *hybrid* language ideology (De Schutter 2007). Discreteness embraces the concept of well–defined linguistic structures and identities, characterized by monolingualism and distinct linguistic boundaries. Hybridity challenges this by recognizing the prevalence of bi– and multilingualism in our linguistic world, advocating for vague boundaries and linguistic pluralism. The normative conclusion drawn from this perspective leans toward language policies that respect hybrid linguistic identities, promoting plurilingual rights and shared public spaces.

The final goal of such policies is that of enabling minority language speakers not only to freely use their language, but also to preserve it. In this sense, the effective implementation of minority language policies through the recognition of language right helps the process of "language maintenance", understood as "the continuing use of a language in the face of competition from a regionally and socially powerful or numerically stronger language" (Mesthrie 1999, p. 42). Recognition and promotion of minority languages can thus prevent "language shift", that is, "the gradual replacement of one's main language or languages, often labelled L1, by another language, usually referred to as L2, in all spheres of usage" (Pauwels 2016, p. 18). While language shift typically unfolds gradually over a couple of generations, it has been demonstrated that "the shifting away from the L1 does not occur simultaneously

across all its uses or functions; rather, it gradually recedes across an increasing number of uses, functions and settings" (Pauwels 2016, p. 19), a process labelled as "language attrition" (Schmid 2011). The outcome of "language shift" is the definitive loss of a language, so that it is no longer spoken anywhere in the entire world — different terms are used such as "language death", "language loss" or "linguistic extinction". Instead, "linguicide" identifies those instances in which the death of a language is the result mostly of active breaches of fundamental human rights, although it can be caused also by a passive behaviour by public authorities (Skutnabb–Kangas and Phillipson 1996). Related to these processes, the term "linguicism" identifies a set of "ideologies, structures and practices which are used to legitimate, effectuate and reproduce an unequal division of power and resources (material and immaterial) between groups which are defined on the basis of language" (Philipson 1992, p. 47). Therefore, language shift is an intergenerational process that can conduct to language loss if not reversed with policies of language maintenance.

2. How and where?

Language rights have traditionally been implemented based on either the principle of personality or the principle of territoriality. In general terms, the former asserts that citizens should have the same set of (official) language rights regardless of their location within the country, while the latter suggests that language rights should vary from one region to another based on local conditions. However, different disciplines have adopted different approaches to this distinction.

According to the "stricter" approach commonly found in political philosophy, territoriality in language policy involves recognizing only one language within a specific region, while personality principle allows for the recognition of multiple languages within the same area, promoting institutional bilingualism or multilingualism. Conversely, according to the broader approach prevalent in comparative law and autonomy studies, territoriality denotes a set of language rules specific to a defined geographic area (either monolingual or multilingual)

determined by the governing authority of that territory. Meanwhile, implementing the personality principle means that language rights are tied to individuals, permitting them to exercise their linguistic choices regardless of their location within a jurisdiction. Essentially, both territoriality and personality concepts serve to measure the extent of individual linguistic freedoms within linguistic policies, irrespective of territorial organization, and to delineate various institutional models of linguistic governance in decentralized states (De Schutter 2008, Arraiza 2016). For this reason, it has been argued that the two idealized concepts of territoriality and personality are rarely encountered in their purest forms. This is because, in practice, monolingual and plurilingual regimes often intersect and intertwine in various ways (Riera Gil 2016).

Notwithstanding these conceptual issues, granting rights according to personality or territoriality often involves devolving powers or competences to a specific group or region, leading to a fundamental distinction between so–called "non–territorial" (NTA) and "territorial" autonomies (TA). Particularly in the realm of language, there exists a complex and mutually reinforcing relationship between autonomy regimes and linguistic groups. This is evident in the devolution of powers concerning language and education, including official language recognition, language standardization, the language of instruction, as well as the development of curriculum and syllabi, which become tools to shape identities within linguistic groups (Arraiza 2015).

Concerning the specific implementation of autonomy arrangements, TA, linked with the delegation of powers over language policy, undoubtedly provides a clear framework applicable to all residents of a specific sub–state entity. However, as previously mentioned, a strict implementation of the territoriality principle, especially in relation with minority languages, fails to account for instances of linguistic pluralism or hybridity such as when two or more ethnic groups lay claims to the same territory; multiple language groups coexist in a manner where delineating clear boundaries around monolingual communities is impractical; people with plurilingual repertoires and multicultural backgrounds do not identify exclusively with one group or another, etc. (Alcalde 2018). Additionally, NTA has been considered a tool to de–emphasize the identity claims of sub–state national groups, given its

perceived ability to accommodate ethnocultural diversity while rejecting any endorsements of territorialized nationalist demands.

For a couple of decades, there has been therefore a resurgence of interest in NTA arrangements, precisely because they are seen as offering a diverse array of solutions that could transcend a purely geographical approach to language rights. However, NTAs have also encountered some criticism. For instance, it has been claimed that the concept of non–territorial autonomy is, at best, a "bunch of ideas" (Osipov 2018, p. 624) compared between themselves as a tribute to a century–old "romantic vision of ethnicity and nationality" (Osipov 2018, p. 626), which is unaware of the real–life political apathy of most minority members(4). Although it is not clear whether such disillusion stems from a deliberate underdevelopment of NTAs' competences by the state or whether NTAs in general are bound to be met with disenchantment by minority groups because of their structural limits, it seems however that the absence of a territorial dimension ends up hampering the full development of an active and strong civil society. In fact, there have been doubts on the pragmatic validity of the core feature of non–territorial arrangements, that is the alleged overcoming of the territorial principle. It seems that the difference between territorial and non–territorial arrangements lies in what they target, namely territories or groups, and not in how they are ultimately implemented. In other words, although minorities may be highly dispersed spatially, territory continues to matter. Firstly, non–territorial autonomy is at least confined into the territory of a state, thus having and implicit territorial jurisdiction. Secondly, a given group may relate to the state simultaneously "as a territorial minority (in respect of the zone in which it is numerically dominant) and as a non–territorial one (in respect of its members who are dispersed elsewhere outside the core zone)" (Coakley 2016, pp. 180–181), with different claims and needs(5). Thirdly, non–ter-

(4) For instance, in the case of the Sámi self–government in the Nordic countries, less than one third of the people eligible for voting actually registered as voters (Semb 2005; Stępień *et al.* 2015). Indeed, it seems that participation in the Sámi institutions was even declining in the last decade, since "it fell in Norway from 77,8% in 1989 to 66,9% in 2013, and in Sweden from 71,1% in 1993 to 54,4% in 2013", while "in Finland, the turnout was only 49,6% in the last elections in 2011" (Falch *et al.* 2016, p. 141).

(5) As explained by Coakey (2016, pp. 180–181), "in such cases as Francophone Canada, for instance, the formula that suits those resident in Québec (territorial) is not likely to be optimal for those resident in dispersed conditions outside Québec (non–territorial)".

ritorial government may be territorially restricted inside a specific territorial unit of a state, like the Brussels region in Belgium or the Sami areas in Norway. It seems therefore that "de–territorialisation" works more at a conceptual level, understating and hiding the always constant weight of territoriality, so that "NTA arrangements implicitly depend upon the recognition of territorial attachments of minorities, but once again subordinate them to *peace–and–stability* arguments that benefit the majority nation" (Nootens 2015, p. 50). In other words, non–territorial arrangements offer limited empowerment to minorities, resembling subsidiarity rather than full self–rule. This suggests that while non–territorial approaches may work in specific areas of interest, they cannot fully replace territorial autonomy. Additionally, in some cases, non–territorial governance may be designed to marginalize minority groups.

Instead, the management and recognition of linguistic diversity and plurilingual practices may point towards a process of rescaling of territoriality, meant as a "diversification and relocation of functions to different levels (sub–state, state, transnational, and supranational) and thus the reconstruction of territory at multiple scales" (Kössler 2015, p. 269). For instance, Grin has proposed a system of territorial multilingualism that grants rights to "old" and "new""groups alike on the basis of their territorial presence in different layers of government. Essentially, given three languages (A — majority, B — "new" minority, C — "old" minority) and three tiers of government (national, provincial and local), Grin's system allows for a wide set of combinations: for instance, the basic version of territorial multilingualism will be characterised by the set of official languages {A, B (local); A, C (provincial); A, B, C (national)} (Grin 1995; Grin 2001). Similarly, Castaño Muñoz has proposed a system of territorial multilingualism based on the case of Catalonia: accordingly, "the inhabitants of a territory should know the minority language of that territory (e.g., Catalan) the "local" *lingua franca* (also understood as the majoritarian language, i.e., Spanish) and the global lingua franca as a third language, i.e., English" (Alcalde 2018, pp. 94–95). Furthermore, and with a supranational focus, Laitin has devised a system of territorial multilingualism for Europe drawn from the Indian model where everybody needs to learn English as a global *lingua franca*, together with the official language of the country of residence and the local language if one

lives inside a minority language regime: this will constitute "a new cultural form, not of a single language or single state but of a language repertoire which everybody shares and everybody understands" (Laitin 2013, p. 162). Although immigrant languages are not included in such a '2+/–1 language system, one may argue that the Indian 3+/–1 model (English, Hindi, state language, minority language) can be pursued also in Europe, thus recognising educational language rights (and possibly public use) also to new minorities.

In the end, it does not seem useful to defend a clear distinction between TAs and NTAs and the related principles of territoriality and personality. Since the territorial element is always present so that it is quite difficult to talk about a real process of "de–territorialisation", and since different arrangements are possible at different levels of government creating a differentiated sociolinguistic landscape, territorial and non–territorial solutions can be considered as two sides of the same coin. In this sense, rescaling territorial autonomy to a grassroots level may help eradicate the widespread view that territorial arrangements can set in motion "a slippery slope towards secession" (Palermo 2009, p. 659). Indeed, when TAs are implemented at sub–regional, if not at municipal level, such small units of government have less incentives to secede (if not none), while their competences are adjusted to their actual needs, thus avoiding over–concentration of power at a single level of government. In other words, "territorial division of power is in fact first and foremost an instrument of good governance [...] actually created for this purpose and this function becomes even more relevant the more complex the society and thus more complex the administration" (Palermo 2009, pp. 660–661).

3. Who and when?

Generally considering the concept of "minority", the seminal definition of Capotorti still serves as a conceptual basis for the implementation of forms of minority language protection. In his view, "minority" is "a group numerically inferior to the rest of the population of a State, in a non–dominant position, whose members — being nationals of the State — possess ethnic, religious or linguistic characteristics differing

from those of the rest of the population and show, if only implicitly, a sense of solidarity, directed towards preserving their culture, traditions, religion or language" (Capotorti 1979, para 568). Notwithstanding the relevance of this definition, there have been attempts to adopt a broader approach. For instance, Toniatti has argued that "minorities as such do not exist" (Toniatti 1994, p. 283), rather there are bigger and smaller social groups with different identities. These groups may become "minorities" when they relate themselves with another group, which constitutes a "majority" on the basis of mainly (but not only) quantitative features.

In any case, it is well established that minorities can be identified by a set of objective criteria, among which language is often a prominent characteristic, distinguishing them from a dominant (in numerical and/or socio–political terms) "majority group". However, the mere existence of objective criteria is not enough to identify a group as a minority. Indeed, the recognition of minority status cannot be decided externally and solely by the state but should also be based both on a groups' "sense of solidarity, directed towards preserving their culture, traditions, religion or language" (Capotorti 1979, para 568), and on their members' sense of belonging to a different identity. Indeed, a minority can also be defined as "a group of people who freely associate for an established purpose where their shared desire differs from that expressed by majority rule" (Packer 1996, p. 123). This subjective criterion, called principle of self–identification, implies that individuals may or may not identify themselves as members of a minority and that the external imposition of the minority status must be avoided.

It has been argued that the principle of self–identification give rise to a right of self–identity (Craig 2016). Indeed, para 32 of the 1990 Document of the Copenhagen Meeting of the Conference on the Human Rights Dimension of the CSCS (OSCE) states that "to belong to a national minority is a matter of a person's individual choice and no disadvantage may arise from the exercise of such choice". Similarly, art. 3(1) of the FCNM establishes that "every person belonging to a national minority shall have the right to freely choose to be treated or not to be treated as such and no disadvantage shall result from this choice or from the exercise of the rights which are connected to that choice".

However, since the right of self–identity "does not imply a right for an individual to choose arbitrarily to belong to any national minority, the individual's subjective choice is inseparably linked to objective criteria relevant to the person's identity" (Council of Europe 1995, para 35). Although the Advisory Committee on the Framework Convention for the Protection of National Minorities (ACFC 2016, para 10) pointed out that "a person's free self–identification may only be questioned in rare cases, such as when it is not based on good faith"(6), the State practically still retains a significant margin of appreciation in disputing or denying minority affiliation, and thus in recognising minority status. Indeed, as stated by the European Court of Human Rights in *Ciubotaru v. Moldova* (ECtHR 2010, para 57), "it should be open to the authorities to refuse a claim to be officially recorded as belonging to a particular ethnicity where such a claim is based on purely subjective and unsubstantiated grounds"(7). Against this margin, the ACFC has stressed that objective criteria "must not be defined or construed in such a way as to limit arbitrarily the possibility of such recognition, and that the views of persons belonging to the group concerned should be taken into account by the authorities when conducting their own analysis as to the fulfilment of objective criteria" (ACFC 2014b, para 28).

Furthermore, the recognition of principle of self–identification and the right of self–identity also implies that individuals may show a sense of belonging to multiple identities: indeed, cultures can be seen as objects of choice including "the additional options of multiple

(6) Abuses of the right of self–identity arise especially when a specific ethnic affiliation implies electoral or other advantages. For instance, in its Third Opinion of Bosnia and Herzegovina, the ACFC (2014a, para 151) reported that "some political parties have taken advantage of two factors in particular — first, that candidates of national minorities require fewer signatures for their candidacy to be validated than do others, and second, that nothing prevents an individual from changing their declared ethnic affiliation from one election to the next — in order to include candidates on their lists who claim to belong to a national minority (and may thus be elected to seats reserved for national minorities) but are not recognised as such by national minorities themselves".

(7) However, in his concurring opinion, Judge Mijović stated that "while the majority concentrated on the requirements of Moldovan law that made it impossible for the applicant to adduce any evidence in support of his claim, in my personal opinion a violation should have been based on the authorities' refusal to uphold the applicant's request to change the records in such a way as to reflect his own perception of his ethnic identity", since "I consider self–identification primarily as a matter of personal perception rather than a matter based on objective grounds" (ECtHR 2010, pp. 17–18).

membership and toleration of syncretic and hybrid practices that mix elements from different cultures" (Bauböck 1996, p. 209) in either a successive, cumulative or continuous relation[8]. With regard in particular to language, Extra and Gorter(2007, p. 19) argued that post–modern phenomena "have led to the development of concepts such as a transnational citizenship and transnational multiple identities", something that "not only occurs among the traditional inhabitants of European nation–states but also among newcomers and IM [immigrant] groups in Europe"[9].

This cosmopolitan approach has been endorsed by the ACFC (2012, para 18) with regard in particular to language: indeed, "a person may also identify himself or herself in different ways for different purposes, depending on the relevance of identification for him or for her in a particular situation"; in addition, "a person may claim linguistic rights with regard to several minority languages, as long as the relevant conditions, such as demand and/or traditional residence, contained in the respective articles of the Framework Convention are fulfilled". Similarly, although with an even more fluid approach, the Ljubljana Guidelines on Integration of Diverse Societies state that "individual identities can be and in fact increasingly are *multiple* (a sense of having several horizontal identities; for instance, belonging to more than one ethnicity), *multi–layered* (various identities coexist and overlap in the same person, such as ethnic, religious, linguistic, gender, professional and the like), *contextual* (the context might determine which identity is more prominent at a given moment) and *dynamic* (the content of each identity and the attachment of individuals to it is changing over time)" (OSCE HCNM 2012, p. 14). In fact, as stated by the ACFC (2012, para 13)

(8) Waldron (1992, pp. 781–782) refers to such a multiplicity as the "cosmopolitan alternative'" which questions "first, the assumption that the social world divides up neatly into particular distinct cultures, one to every community, and, secondly, the assumption that what everyone needs is just one of these entities–a single, coherent culture–to give shape and meaning to his life".

(9) This process of "multiplication of identities" has been also recognised in other disciplines, as for instance in language studies: in fact, "with increasing international mobility, the sharp distinction between immigrant and other languages is becoming more difficult to maintain, and research is slowly shifting from the study of the value of "immigrant language skills" or "foreign language skills" to the study of the value of "multilingual skills" (Grin 2017, p. 116).

"language, like identity, is not static but evolves throughout a person's life"; for this reason, "the full and effective guarantee of the right to use one's (minority) language(s) implies that authorities allow free identification of persons through language, and abstain from constraining personal identities into rigid language categories". This means that "inclusive language policies should cater for the needs of everybody, including persons belonging to national minorities living outside their traditional areas of settlement, immigrants and non–citizens" (ACFC 2012, para 33).

Nevertheless, it has been argued that there is often still a perceived hierarchy between historical "old" minorities and immigrant "new" minorities, in particular with regard to cultural and linguistic autonomy. Kymlicka (1995) suggests that if migration is voluntary, it affects the claims immigrants can make in the receiving society. Specifically, they may only be entitled to polyethnic rights, protecting specific cultural and religious practices, but not necessarily language rights. In a similar vein, Patten (2006) argues that insisting on immigrants relinquishing claims to official status for their languages may be necessary to safeguard democratic governance and language maintenance. He suggests that officially recognizing every immigrant language, along with those of established groups, could undermine democratic self–government. For this reason, "established members of a community (members of "national groups") have priority over immigrants in claiming official language rights precisely because they are *established*" (Patten 2006, p. 113). This distinction is very present both at local and at supranational level: for instance, with regard to the EU, "whereas the national languages of the EU with English increasingly on top are celebrated most at the EU level, RM [regional or minority] languages are celebrated less and IM [immigrant] languages least" (Extra 2017, p. 332).

However, it has also been claimed that "to the extent that immigrants are worse off than (most) others in their destination society, this is likely to be unfair, even assuming that they are fully responsible for the decision to migrate" (Holtug 2017, p. 134). Furthermore, public authorities are not bound to recognise as official every minority, historical, national or immigrant language, but they can apply "the widely accepted principle in international law of *where numbers warrant*" (May

2017, p. 41)[10], thus granting language rights depending on how many members of a given language group are present in a given administrative unit (country, area, region, municipality, etc.). Finally, with regard to the priority given to established groups, Heim (2016, p. 219) has argued that "history and territory describe best how certain groups have achieved their status, but they are not decisive for the question as to which group *should* enjoy how many rights". Indeed, while subjective criteria are an unchallenged requirement in the recognition of "old" and "new" minorities alike, history and territory as objective criteria are being deemed insufficient to respond to the challenges of a more and more diverse society. This does not by any means mean that they are not useful criteria. However, they can be combined with other factors to achieve a fairer account of group rights. For instance, Heim uses the case of Chinese speakers in Canada to claim that immigrants "should be granted more rights if they a) *deserve* it based on their substantial contributions to a public good, e.g. serving national armed forces; b) have *participated* in democratic or social processes of the host society, e.g. by fostering trade relations with the homeland; or c) share characteristics of *need*, e.g. socio–economic disadvantage and marginalisation" (Heim 2016, p. 225).

Although these approaches have still to be followed by a wider and possibly interdisciplinary debate, they show a more inclusive understanding of language rights based on a definite set of criteria, which still leaves to public authorities a residual margin of appreciation. The definition of minority has never been univocal and universal, so much so that scholars like Medda–Windischer (2015, p. 25) called for "an inclusive approach based on a common and broad definition of minorities". This would "reconcile the claims of historical minorities and of new groups originating from migration", thus assuming, as underlined before, that "policies that accommodate traditional minorities and migrants are allies in the pursuit of a pluralist and tolerant society" (Medda–Windischer 2017, p. 26). Although it would be unfeasible to grant protection to each and every language spoken in a given country,

(10) For instance, "The *European Charter*, and the *Framework Convention* use formulations such as *in substantial numbers* or *pupils who so wish in a number considered sufficient*' or *if the number of users of a regional or minority language justifies it*" (Stutnabb–Kangas 2007, p. 378).

states have to take this evolution of the "minority" category into account, allowing for the inclusion of "new languages", for multiple affiliation, and for a general process of un–labelling that will shift the concern from definitions to the actual implementation of a more inclusive language policy. As stated by the Venice Commission, "bearing in mind the failed attempts so far to come up with a common definition of the term "minority" capable of mustering wide State support both at European and international levels, [...] attention should be shifted from the definition issue to the need for an unimpeded exercise of minority rights in practice" (Venice Commission 2007, p. 38). In line with this inclusive evolution, de Varennes has provided a new clear working definition of the concept of minority: "an ethnic, religious or linguistic minority is any group of persons that constitutes less than half of the population in the entire territory of a State whose members share common characteristics of culture, religion or language, or a combination of any of these. A person can freely belong to an ethnic, religious or linguistic minority without any requirement of citizenship, residence, official recognition or any other status" (UNHRC 2020, para 70).

4. What?

Language is characterized by the presence of variations, which can be either social or geographical in nature. Social groups, regardless of their size, tend to develop distinct speech patterns that differentiate them from other social entities (Hallen and Linn 1984). Additionally, nearly every language exhibits geographic variations or dialects. However, the concept of languages as distinct and separate systems with well–defined boundaries is closely tied to the nation–building processes, particularly evident in Europe. As illustrated by Wright (2015), during the early modern period, the majority of Europeans communicated using languages that fell within dialect continua such as Romance, Germanic, and Slavic. Accordingly, the linguistic landscape of that time "is best described as overlapping isoglosses with no clear linguistic demarcation lines on the continuum" (Wright 2015, p. 115). Eventually, linguistic demarcation lines began to emerge with the process of *Ausbau*, as

described by Kloss (1967), that is the codification and standardization of national languages, aiming for both maximum linguistic convergence within the national group and maximum differentiation from neighboring national groups (Milroy and Milroy 1985).

Hence, while the distinction between "language" and "dialect" is inherently relative (Bloomfield 1933; Haugen 1966), while the reclassification of "dialects" as "languages" and the consequent process of standardization can be primarily viewed as a political decision. As famously said, "a language is a dialect with an army and a navy" (Weinreich 1945; Maxwell 2018). Additionally, standardisation is often driven by instrumental economic reasons: "just as the proliferation of varying coinages or weights and measures is dysfunctional, so a proliferation of different forms of the language would be highly undesirable in a society that requires widespread communications" (Milroy 2006, p. 134).

In socio–linguistic terms, standardization is described as "the process of one variety of a language becoming widely accepted throughout the speech community as a supradialect norm — the "best" form of the language — rated above regional and social dialects, although these may be felt to be appropriate in some domains" (Ferguson 1996, p. 189). Consequently, standardized languages, though criticized as "unnatural" and "pathological in their lack of diversity" (Hudson 1980, p. 34), are considered "superordinate language varieties representing in one way or another correct or prestigious linguistic usage" (Van Wyk 1992, p. 25). Milroy and Milroy (1985) outline seven stages of standardization, which are not necessarily sequential: selection, acceptance, diffusion, maintenance, elaboration of function, codification, and prescription. Each stage may involve different actors in society, influencing the outcome of the process in different ways. For example, the involvement of external actors or experts may hinder acceptance by native speakers as the end–product may feel like a "foreign invention" (Jones 1995). Finally, standardization impacts various language features at different stages, including grammar, spelling, word choice, pronunciation, and script.

However, it would be inaccurate to view "standards" as a languages' final state. Instead, standardization is an ongoing process where linguistic uniformity is never fully achieved: indeed, "the standard variety will contain its own variations, both synchronically and diachronically"

(Pillière and Lewis 2018, para 24) while "it seems appropriate to speak more abstractly of standardization as an ideology, and a standard language as an idea in the mind rather than a reality — a set of abstract norms to which actual usage may conform to a greater or lesser extent" (Milroy and Milroy 1985, p. 19). Furthermore, standard languages are primarily written languages (Slaughter 1982), underscoring their association with the nation–building process. There appears to be an inseparable connection between written language and nationalism, as illustrated by Anderson's contentious theory of print capitalism (Anderson 1983).

The standardization process may offer significant advantages to a language community. Instrumentally, it provides a common set of linguistic norms that streamline communication among a wider range of users. For example, a "standard language" is more suitable for mainstream education as it reduces the costs associated with training teaching staff and developing educational materials by broadening the target audience. Additionally, standardization may serve identity–related purposes as it may serve to reflect and symbolize various forms of identity (regional, social, ethnic, or religious), as well as to confer prestige upon speakers, differentiating those who use it from those who do not — namely "dialect speakers" (Wardhaugh 2006).

For these reasons, standardization becomes crucial in the process of recognition, protection and promotion of minority languages (Jones 1995). Indeed, Costa *et al.* (2017, p. 11) note that "a prescriptive standard, frequently in conjunction with some degree of legal recognition, is often the weapon of choice in struggles to resist minority status and marginalisation". The recognition of minority language rights may involve measures like minority language education, increased use of the minority language in public administration, and the establishment of minority language media. Consequently, language policies implemented in these realms facilitate language standardization by consolidating a larger user base. Conversely, Wright suggests that "where we find acceptance of linguistic variation among the component parts of a group perceived as a minority, we will mostly find that speakers have minimal language rights" (Wright 2018, p. 648). In essence, the implementation of minority language rights may both require and facilitate the

process of language standardization. More contentiously, Jones speculates that broader nation–building processes may incite smaller acts of minority resistance through standardization: "engulfed by the language of another country, the variety spoken by the minority speech community has a better chance of surviving if it can be perceived by its speakers as being on a par with that of the larger speech community in terms of its functional domains" (Jones 1995, p. 424).

5. From language to religion …

After having analyzed the different stages involved in recognizing and promoting linguistic diversity, along with the specific constraints related to its categorization and the implementation of autonomy measures, it is now feasible to identify common issues and significant differences in the parallel and complementary efforts towards recognizing and promoting religious diversity. The aim of this comparison is to briefly identify potential synergies and overlooked limits in current pluralist approaches, while indicating fault lines from which to initiate a path of inclusion.

With regard to the debate about linguistic justice and its relationship with cultural justice (including religion and religious denominations), most authors build their comparison on a common postulate, namely that "religious secularization" is possible while "linguistic secularization" is not, since language cannot be separated by the state.

It seems indeed impossible to avoid choosing one or more languages as official languages in a given territory, this due to the need of ensuring the effective functioning of all public socio–political institutions — from parliaments to public schools, from courts to public media. Actually, the recognition of linguistic diversity through the establishment of official languages is by itself a means to restore linguistic imbalances, promote minority languages and thus contribute to the process of language maintenance. Especially where linguistic minorities are territorialized, the recognition of minority languages as co–official languages in specific territories has in some instances significantly helped language revitalization (Gorter *et al.* 2012) — although potential successes

seem to depend on the actual implementation of solid and effective language policies rather than strictly and solely on the process of formal recognition (Zeba 2022).

However, this process of linguistic recognition and inclusion is limited by both ideological and functional/technical issues related to the management of linguistic diversity, thus actually resulting in a situation of *oligolingualism* (Blommaert 1996) — that is, the reduction of "the number of (societally, and thus economically, valuable) languages in use" (Blommaert *et al.* 2012, p. 6) in a specific territory. On the one hand, political institutions at all levels often adhere to a *monoglossic* and/or *transparent* language ideologies according to which different languages are separate entities in the individual's linguistic repertoire and they should also be used separately (Nanz 2007; De Schutter 2007), thus contributing to "clusters of monolingual–dominant, monolingual–minoritized publics" (Strani 2020, p. 25) with exclusionary effects. On the other hand, although it has been argued that "elites, media, and multilingual citizens can do the job of translating political opinions voiced in other languages when only a few languages are recognized" (Boucher 2023, p. 634), nevertheless, the management of multilingual communication through translation and interpretation with or without the use of automated language tools encounters functional and technological limits due to factors like the use of pivot languages, the lack of corpora in specific languages, underdeveloped algorithms, and the increasing use of English as a *lingua franca* (Bragg *et al.* 2019; Leal 2022; Zou *et al.* 2022; De Camillis *et al.* 2023).

On the contrary, it has been argued that state neutrality in respect of religion is much more achievable, at least in terms of official public recognition. In fact, full "religious neutrality" is less practical than it appears. Firstly, as pointed out by Brubaker (2015, p. 8; Alba 2005), "one can easily identify pervasive traces of Christianity in the public life of western liberal democracies: the reckoning of dates according to the Christian calendar, the organisation of holidays or the privileging of Sunday as a day of rest". Secondly, as argued by Boucher (2023, p. 632), courts "can hardly avoid operating with an official legal conception of what religion is in order to adjudicate claims for religious accommodation (or for establishment/disestablishment)", a situation that

can easily create imbalances by giving states "some leeway to circumvent well–institutionalised norms of free exercise and non–discrimination" (Brubaker 2015, p. 9). Indeed, any society is embedded into sociocultural dynamics that have been diachronically influenced by different religious traditions. This can lead to structural forms of indirect discrimination when, for instance, certain religious activities are hindered by the weekly, monthly or yearly predetermined schedules according to common practices resulted from historical religious prescriptions.

With regard to the reasons underlying the implementation of systems of linguistic and religious protection, it is clear that both religion and language hold an identity–related value, since they can both be used as cultural markers. Instead, it seems that only language entails a clear instrumental dimension related to its role as communicative means. However, it is important to stress that some authors have — contentiously — argued also in favor of an instrumental value of religions, which can serve, first, "as the sources of moral understanding without which any majoritarian system can deteriorate into simple tyranny, and, second, they can mediate between the citizen and the apparatus of government, providing an independent moral voice" (Carter 1993, pp. 36–37; Sapir 1999; Malik 2011). Notwithstanding these views, the main difference between religion and language emerges if the identity–related dimension is approached beyond monist perspectives with a hybrid language ideology. Indeed, while individuals can identify themselves with a language and with multiple different languages at the same time and/or in combination, this is less so in regard to religion, at least in present times. Linguistic identities are becoming more and more hybrid, fluid, multiple, contextual, multilayered and dynamic, and this process is fostered by migratory flows contributing to contexts of "linguistic superdiversity" in which language contact between different groups is a daily event, while practices of code–switching and translanguaging are quite common (Wei and Wu 2009; Creese and Blackledge 2010; García and Wei 2014; Albirini and Chakrani 2017; Chini 2018; Lantto 2018). On the contrary, multiple religious belonging and religious hybridity (Cornille 2021; Jones 2022) are still quite contentious concepts even beyond the "hard–line" view of total commitment to just one religion (Cornille 2002), although this is lees

the case outside Europe (Engler 2009). Specifically, authors like Diller (2016) and Bruce (2017) have pointed out that multiple religious belonging may encompass in reality several different practices:

– Proper multiple religious belonging, identifying the rare situation in which an individual is an "observant" member of more than one religion;
– Universalistic re–interpretation of multiple religions, by ignoring incompatible differences among the professed religions;
– Multiple religious association, especially common in inter–faith marriages;
– Multiple religious interest in more than one religion;
– Ancillary religious respect in another religion;
– Secular respect for all religions, meant as the secular practice of trying to treat different religions with equal respect.

Nevertheless, the "modern" development of both linguistic and religious hybridity, or better its re–discovery and multiplication, is strictly connected with the need of implementing positive measures — e.g. through autonomy arrangements — to ensure equality between different language and religious communities. As argued by Brubaker (2015, p. 8; Gal 1989; Wimmer 2013), "large–scale political, economic and cultural processes have transformed *latent* into *manifest* heterogeneity", since the issue of "difference and inequality — of inequality linked to forms of cultural difference — comes into being only when different languages and different religions are brought into regular and intensive relations with one another under the same political roof, and when the tightly integrated nation–state emerges as the dominant model of political organisation".

Accordingly, it has long been discussed how to accommodate linguistic and religious diversity through different systems of TA and NTA (Malloy and Palermo 2015; Coakley 2017). Ruiz Vieytez (2021, p. 6) offers a clear summary of the discussion around which form of autonomy is most used for either religious or linguistic communities: "territorial self–government and recognition of official status are much more closely linked to linguistic diversity than to religious diversity,

whereas consociationalism and power–sharing instruments operate in the reverse way", although "there are some examples of territorial self–government of religious differentiation and of the official status of religions or churches, just like some isolated examples can be found of personal autonomies or consociational arrangements with a predominantly linguistic basis".

Beyond this well–established debate, there are at least a couple of issues that may be interesting to discuss in the comparison between the recognition of linguistic and religious forms of autonomy: namely, criteria of entitlement and the accommodation of potentially increasing forms of hybridity.

Before entering these considerations, it is however important to circumscribe the scope of this discussion. Considering the contentious nature of religious autonomy and partially also of some forms of linguistic autonomy, especially if understood as coercive systems, it may be safer to focus on so–called weak or moderate establishments. Recent debates in political philosophy have indeed draw a distinction between illiberal and liberal forms of religious establishment (Ahdar and Leigh 2005; Modood 2010; Bonotti 2012; Laborde 2013; Seglow 2017), among which weak or moderate establishments may give "special rights or benefits to the adherents of the established religion, including, for instance, providing financial support to the established religion, allowing religious instruction in public schools, or granting political or legal powers to religious authorities" (Bardon 2022, p. 256).

With regard to criteria of entitlement to forms of autonomy, it seems that both religious and linguistic autonomies exhibit an overreliance on historicity and citizenship — often coupled with territoriality in the case of linguistic claims (Sloboda 2016). Indeed, many states have adopted temporal criteria to restrict minority rights to national "traditional" autochthonous groups. For instance, Hungary and Poland use a very debated time requirement of 100 years, something that prevents some groups such as the Polish Greek diaspora to gain recognition as a minority. In this regard the Venice Commission (2022, p. 9) stated that "the criterion of three generations has been found to be more suitable than the very restrictive criterion of 100 years". Other states still rely in temporal criteria though with a much fuzzier approach. For

example, according to Danish authorities, "the distinctive mark of a national minority is that it is a minority population group which above all has historical, long–term and lasting links to the country in question — in contrast to refugee and immigrant groups in general" (ACFC 2019, p. 4). Given this definition, Denmark refuses to recognise Roma as national minorities because they "have no historical or long–term and unbroken association with Denmark, but consist partly of immigrants and partly of refugees" (ACFC 2004, p. 10). Actually, it has been argued that this inaccessibility is less strong for religious establishments: "established regimes of equal linguistic treatment are not "joinable" by new, immigration–generated languages, while established regimes of religious parity are joinable — albeit not easily or automatically so — by immigrant religions" (Brubaker 2015, p. 11; Brubaker 2013). However, there are cases in which also weaker forms of religious establishment have been denied to immigrant groups, especially in the case of Muslims (Alicino 2022). Therefore, it needs to be further evaluated how the protection of linguistic and religious diversity can be effectively disentangled from excessively restrictive criteria such as historicity and citizenship. This would provide a fertile ground for the development of a more inclusive approach to cultural diversity that would benefit both domains.

With regard to increasing forms of linguistic and potentially religious hybridity resulting specifically from international migratory phenomena, it needs to be discussed how linguistic and religious claims coming from these instances can be effectively addressed by autonomy systems that too often rely on a precise identification of what constitutes a specific language or religion. However, the fields of linguistics and education have paved the way for inclusivity. Through theoretical and empirical studies, scholars have emphasized the beneficial effects of incorporating non–standard dialects, along with minority languages, in educational settings (Siegel 1999; Papapavlou and Pavlou 2007; Tegegne 2015; Leonardi 2016). There exists a longstanding tradition in certain countries where sociolinguists and dialectologists work to provide teachers with contrastive analyses of various dialects. This effort is often driven by the belief that such analyses can help educators differentiate genuine errors from instances of language transfer, while

also teaching students about the systematic differences between dialects and the standard language (Cheshire 2007). Moreover, integrating dialects into institutional contexts can validate linguistic diversity, countering the homogenizing tendencies of standardization. This approach places speakers at the forefront of language policies. In fact, understanding standardization processes and linguistic variation doesn't merely involve formalizing a specific variant; rather, it involves legitimizing diversity and hybridity. As argued by Wright, "we should understand language not as a fixed and stable structure (de Saussure's *langue*), but rather focus on communication as a messy human behaviour that adapts and flexes with new pressures, reflecting identity and helping create it (de Saussure's *parole*)" (Wright 2018, pp. 651–652). Instead, due in part to the fact that religious hybridity in its stronger form is still an rare event at least in Europe, it remains to be seen how religious establishments can approach such variation in a meaningful and effective way beyond pure tolerance.

6. … and back: concluding remarks

The question of how to best recognize and accommodate linguistic diversity remains a complex and multifaceted issue. This paper has explored several key dimensions of the debate around linguistic justice – the underlying rationales, the mechanisms and scales of implementation, the evolving definitions of minorities and their linguistic rights, the processes of standardization, and the parallels with religious diversity. While religious diversity allows for greater state neutrality in theory, in practice both linguistic and religious policies must navigate deeply rooted sociocultural realities. Criteria like historicity and territoriality that constrain minority rights affect both domains. As hybrid and multiple linguistic/religious identities proliferate with increased migration, accommodating these fluid identities will likely prove an ongoing challenge for autonomy regimes.

In this regard, combining religious and linguistic studies may offer innovative framework of understanding that may help grasp ongoing dynamics. Specifically, as the debate about linguistic justice has

been extended to religion in a comparative perspective, similarly the discourse on Multiple Religious Belonging (MRB) may contribute to a more effective comprehension of post–modern linguistic environments and the resulting multilayered hybrid repertoires. For instance, resorting to MRB concepts may offer a categorising framework for all those different combinations of multilingual identities encompassing plurilingual repertoires ranging from local dialects to global *lingue franche.*

Ultimately, this analysis highlights the need for nuanced, inclusive policies aimed at accommodating both linguistic and religious diversity by providing substantive rights while embracing sociocultural complexities Given the fundamental yet evolving nature of identities, achieving true equality in the linguistic and religious domain may require rejecting rigid classifications in favor of adaptable solutions attentive to local contexts. While clear answers remain elusive, a willingness to continually reevaluate policies and broaden notions of belonging offers a path forward.

Bibliographic references

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorities (2004) *Second Report submitted by Denmark,* ACFC/SR/II(2004)004.

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorties (2012) *The Language Rights of Persons Belonging to National Minorities Under The Framework Convention, Thematic Commentary No 3,* ACFC/44DOC(2012)001 rev.

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorities (2014a) *Third Opinion on Bosnia and Herzegovina*, ACFC/OP/III(2013)003.

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorities (2014b) *Third Opinion on Bulgaria*, ACFC/OP/III(2014)001.

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorities (2016) *The Framework Convention: a key tool to managing diversity through minority rights, Thematic Commentary*

No 4, The scope of application of the Framework Convention for the Protection of National Minorities, ACFC/56DOC(2016)001.

ACFC — Advisory Committee on the Framework Convention for the Protection of National Minorities (2019) *Fifth Report submitted by Denmark*, ACFC/SR/V(2019)007.

Ahdar R.J. and I. Leigh (2005) *Religious Freedom in the Liberal State,* Oxford University Press, Oxford.

Alba R. (2005) *Bright vs. Blurred Boundaries: Second–generation Assimilation and Exclusion in France, Germany, and the United States*, "Ethnic and Racial Studies", 28(1): 20–49.

Albirini A. and B. Chakrani (2017) *Switching codes and registers: An analysis of heritage Arabic speakers' sociolinguistic competence*, "International Journal of Bilingualism", 21(3): 317–339.

Alcalde J. (2018) "Linguistic Justice: An Interdisciplinary Overview of the Literature", in M. Gazzola, T. Templin and B.–A. Wickström (eds.), *Language Policy and Linguistic Justice. Economic Philosophical and Sociolinguistic Approaches,* Springer, Cham, 65–149.

Alicino F. (2022) *The Legal Treatment of Muslims in Italy in the Age of Fear and Insecurity*, "Journal of Law and Religion", 37(3): 478–500.

Anderson B. (1983) *Imagined Communities: Reflections on the Origins and Spread of Nationalism*, Verso, London.

Arraiza J.–M. (2016) *Language Diversity Speaking to Autonomy: Exploring the Relations between Autonomy and Minority Language Education*, "Revista de Llengua i Dret", 66: 105–123.

——. (2015) *The Management of Linguistic Diversity through Territorial and Non–Territorial Autonomy*, "Europäisches Journal für Minderheitenfragen", 8(1): 7–33.

Bardon A. (2022) *Christmas, Crescents, and Crosses: When Is Symbolic Religious Establishment Permissible?*, "American Journal of Political Science", 66: 255–266.

Barry B. (2001) *Culture and Equality: An Egalitarian Critique of Multiculturalism*, Harvard University Press, Cambridge.

Bauböck R. (1996) *Cultural Minority Rights for Immigrants*, "The International Migration Review", Special Issue: Ethics, Migration, and Global Stewardship, 30(1): 203–250.

Blommaert J. (1996) *Language Planning as a Discourse on Language and*

Society: The Linguistic Ideology of a Scholarly Tradition, "Language Problems & Language Planning", 20(3): 199–222.

——., S. Leppänen and M. Spotti (2012) "Endangering Multilingualism", in J. Blommaert, S. Leppänen, P. Pahta and T. Räisänen (eds.), *Dangerous Multilingualism,* Palgrave Macmillan, London, 1–21.

Bloomfield L. (1933) *Language*, George Allen & Unwin, London.

Bonotti M. (2012) *Beyond Establishment and Separation: Political Liberalism, Religion and Democracy*, "Res Publica", 18(4): 333–349.

Boucher F. (2023) *Comparing Language and Religion in Normative Arguments About Linguistic Justice*, "Metaphilosophy", 54(5): 626–640.

Bragg D., O. Koller, M. Bellard, L. Berke, P. Boudreault, A. Braffort, N. Caselli, M. Huenerfauth, H. Kacorri, T. Verhoef, C. Vogler and M. Ringel Morris (2019) "Sign Language Recognition, Generation, and Translation: An Interdisciplinary Perspective", in *Proceedings of the 21st International ACM SIGACCESS Conference on Computers and Accessibility (ASSETS '19)*, Association for Computing Machinery, New York, USA, 16–31.

Brubaker R. (2013) *Language, Religion and the Politics of Difference*, "Nations and Nationalism", 19(1): 1–20.

——. (2015) *Linguistic and Religious Pluralism: Between Difference and Inequality*, "Journal of Ethnic and Migration Studies", 41(1): 3–32.

Bruce S. (2017) *Multiple Religious Belonging: Conceptual Advance or Secularization Denial?*, "Open Theology", 3(1): 603–612.

Capotorti F. (1979) *Study on the Rights of Persons Belonging to Ethnic, Religious, and Linguistic Minorities*, E/CN.4/Sub.2/384/Rev.1, United Nations, New York.

Carter S.L. (1993) *The Culture of Disbelief: How American Law and Politics Trivialize Religious Devotion*, Basic Books, New York.

Castaño Muñoz J. (2006) *Sobre la justícia lingüística: l'alternativa del multilingüisme territorial*, "Revista de Llengua i Dret", 46: 359–389.

Cheshire J. (2007) "Dialect and Education: Responses from Sociolinguists", in A. Papapavlou and P. Pavlou (eds.), *Sociolinguistic and Pedagogical Dimensions of Dialects in Education*, Cambridge Scholars Publishing, Newcastle, 14–33.

Chini M. (2018) "Il contesto socio–demografico e scientifico", in M. Chini and C.M. Andorno (eds.), *Repertori e usi linguistici nell'immigrazione. Una indagine su minori alloglotti dieci anni dopo*, FrancoAngeli, Milano, 15–40.

Coakley J. (2016) *Conclusion: Patterns of Non–Territorial Autonomy*, "Ethnopolitics", 15(1): 166–185.

——. (ed.) (2017) *Non–territorial Autonomy in Divided Societies. Comparative Perspectives,* Routledge, New York.

Cornille C. (2002) "Introduction: The Dynamics of Multiple Belonging", in C. Cornille (ed.), *Many Mansions? Multiple Belonging and Christian Identity*, Orbis, Maryknoll, 1–6.

——. (2021) *Religious Hybridity and Christian Identity. Promise and Problem*, in "Currents in Theology and Mission", A Breadth of Belonging: Navigating Interreligious and Intercultural Spaces, 48(1): 8–13.

Costa J., H. de Korne and P. Lane (2017) "Standardizing Minority Languages: Reinventing Peripheral Languages in the 21st Century", in P. Lane, J. Costa and H. de Korne (eds.), *Standardizing Minority Languages. Competing Ideologies of Authority and Authenticity in the Global Periphery*, Routledge, London, pp. 1–23.

Council of Europe (1995) *Explanatory Report to the Framework Convention for the Protection of National Minorities,* Council of Europe Publishing, Strasbourg.

Craig E. (2016) *Who Are the Minorities? The Role of the Right to Self–Identify within the European Minority Rights Framework*, "Journal on Ethnopolitics and Minority Issues in Europe", 15(2): 6–30.

Creese A. and A. Blackledge (2010) *Translanguaging in the bilingual classroom: A pedagogy for learning and teaching?*, "The Modern Language Journal", 94(1): 103–115.

De Camillis F., E.W. Stemle, E. Chiocchetti and F. Fernicola (2023) "The MT@BZ corpus: machine translation & legal language", in M. Nurminen, J. Brenner, M. Koponen, S. Latomaa, M. Mikhailov, F. Schierl, T. Ranasinghe, E. Vanmassenhove, S. Alvarez Vidal, N. Aranberri, M. Nunziatini, C. Parra Escartín, M. Forcada, M. Popovic, C. Scarton and H. Moniz (eds.), *Proceedings of the 24th Annual Conference of the European Association for Machine Translation*, Tampere, Finland, June 2023, 171–180.

De Schutter H. (2007) *Language policy and political philosophy. On the emerging linguistic justice debate*, "Language Problems and Language Planning", 31(1): 1–23.

——. (2008) *The Linguistic Territoriality Principle — A Critique*, "Journal of Applied Philosophy", 25(2): 105–120.

——. (2023) *Taming dignity for multiculturalism*, "Critical Review of International Social and Political Philosophy", 26(1): 22–38.

——. and D. Robichaud (2015) *Van Parijsian linguistic justice — context, analysis and critiques*, "Critical Review of International Social and Political Philosophy", 18(2): 87–112.

Diller J. (2016) *Multiple religious orientation*, "Open Theology", 2: 338–353.

ECtHR — European Court of Human Rights (2010) *Case of Ciubotaro v. Moldova,* Application no. 27138/04), Judgment.

Engler S. (2009) *Umbanda and Hybridity*, "Numen", 56(5): 545–577.

Extra G. (2017) "Language Policy and Education in the New Europe", in T. McCarthy, and S. May (eds.), *Language Policy and Political Issues in Education [Third Edition]*, Springer, Cham, 331–347.

——. and D. Gorter (2007) "Regional and immigrant minority languages in Europe", in M. Hellinger and A. Pauwels (eds.), *Handbook of Language and Communication: Diversity and Change*, Mouton de Gruyter, Berlin, 15–52.

Falch T., P. Selle and K. Strømsnes (2016) *The Sámi: 25 Years of Indigenous Authority in Norway*, "Ethnopolitics", 15(1): 125–143.

Ferguson C. A. (1996) "Standardization as a form of language spread", in T. Huebner (ed.) *Sociolinguistic Perspectives: Papers on Language in Society, 1959–1994,* Oxford University Press, Oxford, 189–199.

Gal S. (1989) *Language and Political Economy*, "Annual Review of Anthropology", 18(1): 345–367.

García O. and L. Wei (2014) *Translanguaging. Language, Bilingualism and Education*, Palgrave Pivot, London.

Gorter D., J. Aiestaran and J. Cenoz (2012) "The Revitalization of Basque and the Linguistic Landscape of Donostia–San Sebastián", in D. Gorter, H.F. Marten and L. Van Mensel (eds.), *Minority Languages in the Linguistic Landscape*, Palgrave Studies in Minority Languages and Communities, Palgrave Macmillan, London, 148–163.

Grin F. (1995) "Combining immigrant and autochthonous language rights: a territorial approach to multilingualism", in T. Skutnabb–Kangas and R. Phillipson (eds.), *Linguistic Human Rights: Overcoming Linguistic Discrimination*, De Gruyter Mouton, Berlin, 33–34.

——. (2001) "Using territoriality to support genuine linguistic diversity, not to get rid of it", in P. Van Parjis (ed.), *The linguistic territoriality principle: right violation or parity of esteem?*, Rethinking Belgium, Brussels, 28–33.

——. (2017) "The Economics of Language Education", in T. McCarthy and S. May (eds.), *Language Policy and Political Issues in Education [Third Edition]*, Springer, Cham, 111–122.

Grosjean F. (1989) *Neurolinguists, beware! The bilingual is not two monolinguals in one person*, "Brain and Language", 36(1): 3–15.

Hallen H.B. and M.D. Linn (eds.) (1984) *Dialect and Language Variation,* Academic Press, Orlando.

Haugen E. (1966) *Dialect, Language, Nation*, "American Anthropologist", 68(4): 922–935.

Heim D. (2016) *"Old" natives and "new" immigrants: beyond territory and history in Kymlicka's account of group–rights*, "Migration Letters", 13(2): 214–227.

Holtug N. (2017) *Luck Egalitarianism and the Rights of Immigrants*, "Ratio Juris", 30(2): 127–143.

Hudson R.A. (1980) *Sociolinguistics.* Cambridge University Press, Cambridge.

Jones A.W. (2022) *Hybridity and Christian identity*, "Missiology: An International Review", 50(1): 7–16.

Jones M.C. (1995) *At What Price Language Maintenance? Standardization in Modern Breton*, "French Studies", 49(4): 424–438.

Kloss H. (1967) *Abstand languages and Ausbau languages*, "Anthropological linguistics", 9: 90–101.

Kössler K. (2015) "Conclusion", in T. Malloy and F. Palermo (eds.), *Minority Accommodation Through Territorial and Non–Territorial Autonomy*, Oxford University Press, Oxford, 245–272.

Kymlicka W. (1995) *Multicultural Citizenship: A Liberal Theory of Minority Rights,* Clarendon Press, Oxford, 107–108.

——. (2001) *Politics in the Vernacular. Nationalism, Multiculturalism, and Citizenship*, Oxford University Press, Oxford.

Laborde C. (2013) *Political Liberalism and Religion: On Separation and Establishment*, "Journal of Political Philosophy", 21(1): 67–86.

Laitin D. (2013) *The Uniting of Europe: A Memoir of Ernst B. Haas*, "Baltic Journal of European Studies", 3(1): 155–171.

Lantto H. (2018) "New Basques and Code–Switching: Purist Tendencies, Social Pressures", in C. Smith–Christmas, N.P.Ó Murchandha, M. Hornsby and M. Moriarty (eds.), *New Speakers of Minority Languages. Linguistic Ideologies and Practices*, Palgrave Macmillan, London, 165–188.

Leal A. (2022) *The European Union's translation policies, practices and ideologies: time for a translation turn*, "Perspectives", 30(2): 195–208.

Leonardi M.M.V. (2016) *Bilingualism or Trilingualism? Social versus linguistic views: Evidence from the Germanic–speaking language group in South Tyrol (Italy)* [Doctoral Thesis], Bangor University.

Malik M.M. (2011) *Religion and Global Peace: The Instrumentality of Religion*, "Individual and Society", 1(2): 149–167.

Malloy T. and F. Palermo (eds.) (2015) *Minority Accommodation Through Territorial and Non–Territorial Autonomy*, Oxford University Press, Oxford.

Maxwell A. (2018) *When Theory is a Joke: The Weinreich Witticism in Linguistics*, "Beiträge zur Geschichte der Sprachwissenschaft", 28(2): 263–292.

May S. (2017) "Language Education, Pluralism, and Citizenship", in T. McCarthy and S. May (eds.), *Language Policy and Political Issues in Education [Third Edition]*, Springer, Cham, 31–45.

Medda–Windischer R. (2015) *Integration of New and Old Minorities in Europe: Different or Similar Policies and Indicators?*, "Integrim Online Papers", 2/2015.

——. (2017) *Old and New Minorities: Diversity Governance and Social Cohesion from the Perspective of Minority Rights*, "Acta Universitatis Sapientiae, European and Regional Studies", 11(1): 25–42.

Mesthrie R. (1999) "Language loyalty", in B. Spolsky (ed.), *Concise Encyclopedia of Educational Linguistics,* Elsevier, Amsterdam, 42–47.

Milroy J. (2006) "The Ideology of the Standard Language", in C. Llamas, L. Mullany and P. Stockwell (eds.) *The Routledge Companion in Sociolinguistics*, Routledge, London, 133–139.

——. and L. Milroy (1985) *Authority in Language: Investigating Language Prescription and Standardisation,* Routledge, London.

Modood T. (2010) *Moderate Secularism, Religion as Identity and Respect for Religion*, "The Political Quarterly", 81(1): 4–14.

Musschenga A. (1998) *Intrinsic value as a reason for the preservation of minority cultures*, "Ethical theory and moral practice", 1: 201–225.

Nanz P. (2007) "Multiple Voices. An Interdiscursive Concept of the European Public Sphere", in J.E. Fossum, P. Schlesinger and G.O. Kværk (eds.), *Public Sphere and Civil Society? Transformations of the European Union,* Arena, Oslo, 11–28.

Nootens G. (2015) "Can Non–Territorial Autonomy Bring an Added Value to Theoretic and Policy–Oriented Analysis of Ethnic Politics?", in T. Malloy and F. Palermo (eds.), *Minority Accommodation Through Territorial and Non–Territorial Autonomy*, Oxford University Press, Oxford, 33–56.

OSCE HCNM — High Commissioner on National Minorities (2012) *The Ljubljana Guidelines on Integration of Diverse Societies & Explanatory Note*.

Osipov A. (2018) *Can 'Non–territorial Autonomy' Serve as an Analytical Term? Between 'Thick' and 'Thin' Approaches*, "International Journal on Minority and Group Rights", 25: 621–646.

Packer J. (1996) "On the Content of Minority Rights", in J. Raïkka (ed.), *Do We Need Minority Rights? Conceptual Issues*, Martinus Nijhoff Publishers, The Hague, 121–178.

Palermo F. (2009) *When the Lund Recommendations are Ignored. Effective Participation of National Minorities through Territorial Autonomy*, "International Journal on Minority and Group Rights", 16: 653–663.

Papapavlou A. and P. Pavlou (eds.) (2007) *Sociolinguistic and Pedagogical Dimensions of Dialects in Education,* Cambridge Scholars Publishing, Newcastle.

Patten A. (2006) *Who Should Have Official Language Rights?*, "Supreme Court Law Review", 31: 101–115.

Pauwels A. (2016) *Language Maintenance and Shift*, Cambridge University Press, Cambridge.

Phillipson R. (1992) *Linguistic Imperialism*. Oxford University Press, Oxford.

Pillière L. and D. Lewis (2018) *Revisiting standardisation and variation*, "E–rea — Revue électronique d'études sur le monde anglophone", 15(2).

Pogge T. (2003) "Accommodation Rights for Hispanics in the U.S", in W. Kymlicka and A. Patten (eds.), *Language Rights and Political Theory*, Oxford University Press, Oxford, 105–122.

Reáume D. and M. Pinto (2012) "Philosophy of language policy", in B. Spolsky (ed.), *The Cambridge Handbook of Language Policy,* Cambridge University Press, Cambridge, 37–58.

Riera Gil E. (2016) *Why Languages Matter to People. Communication, Identity and Justice in Western Democracies. The Case of Mixed Societies*, Collecció Institut d'Estudis de l'Autogovern, 2, Institut d'Estudis de l'Autogovern, Generalitat de Catalunya, Barcelona.

Ruiz Vieytez E.J. (2021) *Protecting Linguistic and Religious Minorities: Looking for Synergies among Legal Instruments*, "Religions", 12(706).

Sapir G. (1999) *Religion and State—A Fresh Theoretical Start*, "Notre Dame Law Review", 75: 579–652.

Schmid M. (2011) *Language attrition*, Cambridge University Press, Cambridge.

Seglow J. (2017) *What's Wrong with Establishment?*, "Ethnicities", 17(2): 189–204.

Semb A. J. (2005) *Sami self–determination in the making?*, "Nations and Nationalism", 11(4): 531–549.

Siegel J. (1999) *Stigmatized and Standardized Varieties in the Classroom: Interference or Separation?*, "TESOL Quarterly", 33(4): 701–728.

Skutnabb–Kangas T. (2007) "Language planning and language rights", in M. Hellinger and A. Pauwels (eds.), *Handbook of Language and Communication: Diversity and Change*, Mouton de Gruyter, Berlin, 365–397.

——. and R. Phillipson (1996) "Linguicide and Linguicism", in H. Goebl, P.H. Nelde, Z. Starý and W. Wölck (eds.), *Kontaktlinguistik. Contact Linguistics. Linguistique de contact. Ein Internationales Handbuch zeitgenössiger Forschung. An International Handbook of Contemporary Research. Manuel international des recherches contemporaines. Volume 1*, de Gruyter, Berlin, 667–675.

Slaughter M.M. (1982) *Universal Languages and Scientific Taxonomy in the Seventeenth Century*, Cambridge University Press, Cambridge.

Sloboda M. (2016) *Historicity and citizenship as conditions for national minority rights in Central Europe: old principles in a new migration context*, "Journal of Ethnic and Migration Studies", 42(11): 1808–1824.

Stępień A., A. Petrétei and T. Koivurova (2015) "Sámi Parliaments in Finland, Norway, and Sweden", in T. Malloy, A. Osipov and B. Vizi (eds.), *Managing Diversity through Non–Territorial Autonomy: Assessing Advantages, Deficiencies, and Risks,* Oxford University Press, Oxford, 117–138.

Strani K. (2020) "Multilingualism and Politics Revisited: The State of the Art", in K. Strani (ed.), *Multilingualism and Politics. Revisiting Multilingual Citizenship*, Palgrave Macmillan, Cham, 17–46.

Tegegne W. (2015) *The Use of Dialects in Education and Its Impacts on Students' Learning and Achievements*, "Education Journal", 4(5): 263–269.

Toniatti R. (1994) "Minoranze e minoranze protette: modelli costituzionali comparati", in T. Bonazzi and M. Dunne (eds.), *Cittadinanza e diritti nelle società multiculturali*, il Mulino, Bologna, 273–308.

UNHRC — United Nations Human Rights Council (2020) *Report of the Special Rapporteur on Minority Issues, Dr. Fernand de Varennes — Education, language and the human rights of minorities*, A/HRC/43/47.

Van Parijs P. (2011) *Linguistic Justice for Europe and the World*, Oxford University Press, Oxford.

Van Wyk E.B. (1992) *The Concept of "Standard Language"*, "South African Journal of African Languages", 12(1): 23–34.

Venice Commission — European Commission for Democracy through Law (2007) *Report on Non–Citizens and Minority Rights,* CDL–AD(2007)001.

Venice Commission — European Commission for Democracy through Law (2022) *Compilation of Venice Commission Opinions and Reports concerning the Protection of National Minorities (Updated)*, CDL–PI(2022)049.

Waldron J. (1992) *Minority Cultures and the Cosmopolitan Alternative,* "University of Michigan Journal of Law Reform", 25(3–4): 751–793.

Wardhaugh R. (2006) *An Introduction to Sociolinguistics. Fifth Edition*, Blackwell, Oxford, 34–35.

Wei L. and C. Wu (2009) *Polite Chinese Children Revisited: Creativity and the Use of Code–Switching in the Chinese Complementary School Classroom,* "International Journal of Bilingual Education and Bilingualism", 12(2): 193–211.

Weinreich M. (1945) *Der yivo un di problemen fun undzer tsayt*, "Yivo–bleter", 25: 3–18.

Weinstock D. (2003) "The Antinomy of Language Policy", in W. Kymlicka and A. Patten (eds.), *Language Rights and Political Theory*, Oxford University Press, Oxford, 250–270.

Wimmer A. (2013) *Ethnic Boundary Making: Institutions, Power, Networks.* Oxford University Press, New York.

Winsler A., M.R. Burchinal, H.C. Tien, E. Peisner–Feinberg, L. Espinosa, D.C. Castro, D.D.R. LaForett, Y.K. Kim and J. De Feyter (2014) *Early development among dual language learners: The roles of language use at home, maternal immigration, country of origin, and socio–demographic variables*, "Early Childhood Research Quarterly", 29: 750–764.

Wright S. (2015) *What is language? A response to Philippe van Parijs*, "Critical Review of International Social and Political Philosophy", 18(2): 113–130.

——. (2018) "Planning Minority Language Maintenance: Challenges and Limitations", in L. Benneth, B.L. Rehg and L. Campbell (eds.), *The Oxford Handbook of Endangered Languages*, Oxford University Press, Oxford, 637–658.

Zeba M. (2022) *Language Rights for 'New Minorities': An Inclusive Perspective on Linguistic Diversity in Europe* [Doctoral Thesis], University of Trento.

Zou L., A. Saeedi and M. Carl (2022) "Investigating the Impact of Different Pivot Languages on Translation Quality", in *Proceedings of the 15th biennial conference of the Association for Machine Translation in the Americas (Workshop 1: Empirical Translation Process Research)*, Association for Machine Translation in the Americas, 15–28.