The European Congress of Ethnic Religions President Dr. Uģis Nastevičs dievturi@gmail.com



Latvijas Dievturu sadraudze Head of the Board Tēriņu 13, Rīga, LV-1004, Latvia

To the Barne- og familiedepartementet

Regarding the Religious Communities Act

We, the European Congress of Ethnic Religions (ECER), according to the Rīga Declaration of the ECER adopted and signed by its representatives, both member organizations¹ and observers, from 17 countries on June 30, 2023,² are honored to inform you about our concerns regarding the proposed amendment of the *Lov om tros- og livssynssamfunn* (Vår ref.: 23/2465),³ increasing the minimum membership to 100, 300, or 500, and that the board should constitute of at least 40% women, to become eligible for obtaining financial support.

It seems inappropriate to artificially push people, just to meet a certain preset percentage, of either gender into a position that they may not be ready to take the responsibility of. There are religious organizations that have been registered and recognized according to the regulations intact so far. A recognized smaller group, due to the change of law, might become discriminated,⁴ just because having less members than demanded.

The ECER condemns such an amendment, as it poses threat to, and undermines religious freedom and cultural diversity also of our member, the *Sjamanistisk Forbund*, a vital ethnic religious organization in Norway. We call for a reconsideration of this discriminatory amendment. If the proposed regulation is to come into force, then it should be applied only to new applicants, and not the former organizations registered and recognized so far.

Rīga, October 15, 2023

Members of the Board

Ιωάννης Μπαντέκας, Giuseppe Barbera, Kyrre Franck, Brenda Lioris, Giuseppe Maiello, Inija Trinkūnienė, and President of the European Congress of Ethnic Religions Uģis Nastevičs

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¹ Namely, member organizations of the ECER are *Latvijas Dievturu sadraudze*, Latvia; *Associazione Tradizionale Pietas — Pietas Comunità Gentile*, Italy; *Groupe Druidique des Gaules*, France; *Ob'єднання рідновірів України*, Ukraine; *Związek Wyznaniowy Rodzima Wiara*, Poland; *Senovės baltų religinė bendrija Romuva*, Lithuania; *Sjamanistisk Forbund*, Norway; *Slovanský krub*, Czech Republic; *Societas Hesperiana Pro Cultu Deorum*, Italy; *Werkgroep Traditie Vzw*, Flanders (Belgium) and The Netherlands; *Tπατο Συμβούλιο των Ελλήνων Εθνικών*, Greece. ² Point 17 "When there is evidence of discrimination, or institutional silence towards requests of recognition of ethnic religions, we as the ECER, will encourage the local government in writing from the Presidency of the Congress, calling upon their willingness to protect and respect the rights of everyone by responding to the request." ³ https://www.regjeringen.no/no/dokumenter/horing-endringer-i-trossamfunnsloven/id2989476/

⁴ Please refer to the *Universal Declaration of Human Rights* (adopted also by Norway in 1948): Article 7 "All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination," and Article 18 "Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance."