

Chapter XI

Regional Comparison of Donation Strategies in Europe, the Byzantine Empire, Islamic Regions, China and Japan: Collaboration of the Japanese Research Group

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In order to make a regional comparison of donation strategies, we conducted a questionnaire survey of the Japanese research group members (the members at the end of the paper) on donation/endowment in each region in pre-modern times (Japan, China, Islamic regions (Arab, Turkey, Iran and Central Asia), Byzantine Empire and Western Europe). Twenty-one questions were asked about five aspects of the donation system: donation as an institution, its actual situation, its purpose, its management and other features. Based on the answers to this questionnaire, as well as previous research, this paper discusses the features of each region regarding donors, beneficiaries, donated properties, purposes and benefits, and management. By asking the fundamental question what did the donor expect of the donation and what kind of social benefit emerged from the donation, I would like to draw a picture of human societies seen through the act of donation.

In 2015 Tokyo symposium, Miura proposed a common definition of the waqf and similar types of donation: (a) irrevocable property donation, (b) distributing the profits to the donor's family and for charitable/religious purposes and (c) by creating a management body independent from the donor and the state. This definition is similar to Borgolte's ideal type of foundation, that "a sum of capital is allocated, with whose revenues a certain goal can be followed over the long term"[Borgolte 2017, 10 (2020, 2)]. In the questionnaire and paper, we include all types of donation that correspond to any of the three requirements.

1. Donation as an Institution

1.1. Terms for Donation and Their Definition in the Region in Question

In both Europe and China, the terms for donation relate to charity and compassion. Waqf means to stop the transfer of ownership, and the term itself does not include the meaning of donation or charity. The Japanese term for donation *kishin* means donation to superiors. The property donated to the buddhas and the *kami* (deities) was regarded as irretrievable by secular people. This is also the case in Christianity and Islam, where donated property was thought to belong to God. However, in Chinese donation, especially the lineage common fields, there was no such idea that ownership was beyond the human realm. This is explained in detail in Kishimoto's paper in this book. Apart from the waqf, there is also *nadhr*, which is a temporary donation, and this is discussed in Kondo's paper.

1.2. Properties to Be Donated

Most of the property donated was real estate (land, buildings, etc.) or profits from it, but movable property was also donated, including cash. In the waqf (by the Sunni/Hanafi law), cash could be lent at interest, and the interest became the beneficiary's income (the same as in Japan). In China, cash was used to buy real estate, but interest-bearing loans were refrained.

In medieval Europe, there were examples of hospitals managing funds with interest. At the Sint-Janshospitaal (Saint John's Hospital) in Bruges in the fourteenth and fifteenth centuries, wealthy elderly citizens donated cash to the hospital and received a *prebende* (stipend) and lifelong care from the hospital [Kawahara 2004, 175–177; Maréchal 1978]. The Hospital of Saint Maria Nuova in Florence in the fifteenth century received funds entrusted to them by citizens, which were invested and redeemed at an annual interest rate of 5% [Kawahara 2004, 188–189].

1.3. Beneficiaries of Donation

Not only religious and charitable institutions, but also donors and their families, could be designated as beneficiaries, as in the waqf. In Europe as well, both religious and civil (familial) donations called mortmain existed from medieval to early modern times [Dedieu 2022]. Differentiated from the charitable waqf that puts the charitable purpose first, the family waqf prioritises benefits to the donor's family. In Japan and China as well, securing profit for the donors themselves, their families and descendants was the main purpose of making donations. In Western Europe, the donor's family and friends could be beneficiaries, but they were secondary. In the Byzantine Empire, there was a way for people to earn an income by building and donating new religious institutions and becoming their managers. In Iran and Central Asia, the mainstream was for donors and their families to become superin-

tendents and to gain a portion of the profits (lesser than 1/10 of the total in Central Asia).

1.4. Laws and Regulations

Canon law in Western Europe, the imperial edicts (collected in the Justinian Code) in the Byzantine Empire, and Islamic law in Islamic regions have regulations regarding donations, but China and Japan did not have any public law regarding donations.

1.5. Donation Procedure

In Europe, the same procedures as for making a will were followed. In the waqf, a donation deed was created, certified in an Islamic court under a qadi (judge), and sometimes registered in the court register. In China, donations would reduce the property of the lineage, so the consent of the lineage was required and was sometimes noted on the estate division certificate. In Japan, beneficiaries such as temples and shrines received and stored donation documents, and hundreds of thousands of donation documents were transmitted to large temples and shrines. They have become the basic source for the study of donation in Japan.

2. Actual Conditions of Donation

2.1. Origin of Donation

The origin of the donation can be found in the fourth century in the Byzantine Empire, the eighth to the ninth centuries in Western Europe, the seventh century in Islamic regions (actually after the ninth century), the tenth century in China, and the eighth century in Japan.

2.2. When and Why Did Donation Spread?

Western Europe: In the eighth to the tenth centuries: An increase in donations to Benedictine, and then Cluniac monasteries. Increasing instances of land being donated in perpetuity in commemoration of the dead (*memoria*). In the twelfth to the thirteenth centuries, with the growth of cities and the revival of Roman law, Italian citizens, especially merchants, made wills “for the salvation of their souls” (*pro*

anima mei). In the thirteenth to the fifteenth centuries, bequests to monasteries and churches, not just to family members, were increasingly common in the Netherlands and Northern France.

Byzantine Empire: Donations began to increase after the fifth century.

Waqf spread after the eleventh century and accelerated during the thirteenth to the fifteenth centuries, parallel to urban development, waqf donation providing the cities with both economic and religious institutions.

In Iran, donations to the Shiite Imams spread after the sixteenth century and to madrasas after the seventeenth century.

In Central Asia, in the latter half of the fifteenth century and beyond during the Timurid dynasty, influential people in political and religious circles were actively setting up waqfs, due to urban economic and cultural development.

In China, lineage donation spread after the end of the Ming period in the mid sixteenth century. The purpose was to maintain and raise social status through mutual aid within the lineage, in response to the penetration of a commodity economy and increasing social mobility through competition.

In Japan, the donation of land became more common in the central city of Kyoto from the twelfth century, and as well to local temples and shrines from the latter half of the thirteenth century. Reasons for the popularity of donation include: (1) securing the basic ownership of land; (2) to evade taxation by the government and its local offices; (3) as faith in the buddhas and the *kami* spread among the common people donated as proof of their faith and for their own salvation; and (4) to avoid the cancellation of sales contracts (*tokusei*).

In each region, the development of the urban economy was behind the spread of donations, and as religious and charitable institutions were provided in the cities, donated properties became the foundation of the urban economy. As the commodity economy expanded and the gap between rich and poor widened, they must have been a financial resource for mutual aid and philanthropic support.

2.3. Basic Pattern of Donation

Europe: Wealthy citizens personally donated their private property (both immovable and movable) to churches, monasteries and charitable institutions for the salvation of their souls.

In Islamic waqf, two basic patterns existed. Ruling elites (ruler, military and civil officials) donated their private property (mostly immovable) for the benefit of religious institutions and for charity (“charitable waqf”). Owners of immovable property (land, shops, houses, etc.) donated it to be transferred to their descendants. While in Egypt and Syria the family waqf spread to small land owners, charitable waqfs were dominant in Iran and Central Asia. In Ottoman Turkey, the imperial

waqf was dominant. The Ottoman royal family and those with privileges from the Sultan donated rights to collect taxes from rural villages and other taxation units for religious and charitable institutions. In the Balkans and Anatolia, ordinary subjects could neither own agricultural land nor donate it. Apart from that, owners of urban real estate and cash donated them for religious institutions such as mosques in the donor's quarter as well as for the donor's family. The donor and his/her descendants could be the superintendent of the donated properties.

In China, the land owner made the donation for the mutual support of the lineage.

In Japan, there were various patterns, but the donation similar to the family waqf in Islamic law, seems to have been the basic form in medieval Japanese society, irrelevant of status, region and period.

Donation in Japan and the family waqf in the Arab region are very similar in that by making a donation, the property was protected from the political power-holders and passed on to the family. In Islamic law, private property rights of individuals are clearly regulated, and inheritance is based on the equal division of inheritance. Donation and inheritance deeds were produced and observed. On the other hand, in Japan, the family (patriarch) held property rights, and inheritance was by primogeniture in principle.

Why did such a similar phenomenon in terms of donation occur in medieval times between the two, with their different principles of property and inheritance law? One answer is that according to the principle of divided inheritance (all spouses and children have inheritance rights, but women have half the rights of men) in Islamic law, real estate is subdivided by inheritance. The waqf can be used as a way to prevent this. In other words, waqf donation treats the estate of family members as undivided property like "household property" in Japan.

2.4. Historical Data to Show the Spread of Donation

A fifteenth-century Italian example: The Hospital of Santa Maria Nuova, the largest charitable institution in Florence, had assets donated or bequeathed to it by citizens; its total assets of 178,571 florins were five times greater than those of the Archbishop of Florence and the Cathedral Council [Park and Henderson 1991; Kawahara 2004, 181–189].

The French scholar Paul Lemerle estimated that two-thirds of all cultivated land in the Byzantine Empire was in the hands of religious institutions in the eleventh century [Lemerle 1979, 215–216; Charanis 1948, 53–54; Beck 1994, 229–230].

The percentage of the villages having waqf land was 41% in fifteenth-century Egypt according to the report of Ibn al-Jī'ān [Miura 2023, 8].

Ö. L. Barkan has estimated; in the year 1521 the province of Bursa yielded a total revenue of 13,849,454 akçes. Out of this, 4,267,862 akçes were allocated to waqfs (31%). Moreover, out of the total 1,882 villages, 450 were situated on waqf lands (24%) [Barkan 1988, 121].

In Tehran in 1853, out of 1,204 shops in the grand bazaar, 176 (15%) were waqf properties [Kondo 2017, 105].

The waqf lands might have been 10–20% of the total agricultural land in pre-revolutionary Central Asia [Pianciola and Sartori 2007, 477].

On Islamic waqf, about 24 to 41% of all the agricultural land might be waqf.

According to the study on land distribution during the Republican period by Amano Motonosuke, lineage fields occupied less than 1% of land nationwide, while in Southern China (Fujian and Guangdong) where there were many villages of the same lineage, about one third of all land was lineage fields [Amano 1978, 1:38–44].

No statistical data or estimation relating to donated land in medieval Japan, but there is a vast amount of donation deeds and related material created and preserved by the recipients, such as temples and shrines.

The highest ratio of donated lands is two-thirds in the eleventh century Byzantine Empire, 41% in Mamluk Egypt, and one-third in republican China, though these figures do not represent precise survey data.

2.5. *What Social Relations Did the Donation Affect or Create?*

Byzantine Empire: A gradual increase in the amount of land that did not contribute to imperial finances (due to tax exemption privileges), which would have been a major problem for state finances. There were many cases where the management of churches that had been donated did not go well and such institutions were incorporated into large existing monasteries. As a result, the donation deeds of such small churches were preserved in the monastic archives. On the other hand, the rebuilding of institutions that had fallen into disrepair became an issue. From here arose the custom known as *charistikia* (benefices). This is the practice of entrusting the redevelopment of abandoned or ruined institutions to laymen for one generation.

A material or spiritual patronage relationship arose between donors and beneficiaries (Western Europe, Islamic regions and Japan), and a horizontal mutual aid relationship was also strengthened (China and Japan). Socio-economically, tax exemptions reduced tax revenue sources (Byzantine Empire, Ottoman Empire and Japan), and rural resources were brought to provide for urban institutions (Arab region, Central Asia). Donors and certain officials became trustees and gained power (Egypt, Ottoman Turkey and Central Asia). In Istanbul, female donors accounted for 37% and the waqf played a role in protecting women's property.

3. Purposes and Social Benefit of Donation

The purposes of donation can be classified into two:

A. Personal motives: (1) to do good deeds for salvation in the next world; (2) to gain fame and honour; (3) to preserve one's tomb; (4) to transfer properties to one's descendants.

B. Social benefits/effects: (1) religious/social institutions; (2) charity/philanthropy; (3) economic infrastructure.

3.1. The Respondent Answers on How Strong Each Factor Was in the Region

All the above-mentioned four personal motives and three social benefits existed in each region. In particular, in the Byzantine Empire, the Islamic Arab region and Japan, all four personal motives were strong: good deeds, salvation, fame, tombs and transfer of properties. In Western Europe, the Arab region, Ottoman Turkey and Central Asia philanthropic factors were strong, while philanthropic factors were moderate in the Byzantine Empire, Iran, China and Japan. Even if there are differences in the purpose of donation as described above, the purpose and motivation of donation are not limited to a single motive, but are rather a mixture of personal motives and social benefits. Being both egoistic (thinking of the self) and altruistic (thinking of others) would be the appeal of donation.

Table 1. Purpose of Donation: Personal Motives and Social Benefits in Eight Regions

Personal motives	Good deeds/ salvation	Fame and honour	Tomb-building	Transferring properties
Western Europe	A	B	A	A
Byzantine Empire	A	A	A	A
Arab region	A	A	A	A
Ottoman Turkey	A	A	B	A
Iran	B	B	B	B
Central Asia	B	B	B	B
China	B	B	B	B
Japan	A	A	A	A

Social benefits	Religious institutions	Charity/ Philanthropy	Social infrastructure
Western Europe	A	A	B
Byzantine Empire	A	B	B
Arab region	A	A	A
Ottoman Turkey	A	A	A
Iran	B	B	B
Central Asia	A	A	A
China	C	B	C
Japan	A	B	B

A: Strong, B: Existing, C: Weak

3.2. Donor and Family as Beneficiary

The author considered that the family waqf system was unique, with donors and their families being beneficiaries. However, this was also possible in Western Europe and the Byzantine Empire (even if the portion of the donor received was small). Chinese lineage properties were aimed at mutual aid and a safety net for the lineage, including the donor's family, and in Japan the main purpose was to protect the donor's estates by donating them to a superior or the deities. On the other hand, in Anatolia and the Balkans during the Ottoman period, private ownership and donation of agricultural land were not possible, and for military men of the Ottoman court (the "sultan's slaves"), the waqf was used as a measure to avoid confiscation of property after death. Family waqfs were few in Iran and Central Asia, where the donor or his family become the superintendent of donated properties and distributed the profits to their family.

In many cases in Japan, especially with regard to land donated to the buddhas and the *kami*, temples and shrines, there were advantages over ordinary inheritance, such as tax privileges and the protection of the temples and shrines in cases of disputes with third parties. The merit was great.

3.3. What Justifies the Donation

In Europe, the concept of Christianity, its charity and salvation (especially from purgatory after the thirteenth century) was influential. In Byzantine society Christianity advocated religious donation as an act based on charity (*caritas*) and compassion (*miser cordia*). Furthermore, donation to poor and charitable institutions was recommended as conduct conducive to one's own salvation (influenced in particular by the penetration of the idea of purgatory, which was introduced at the end of

the twelfth century), and as an act of repentance. However, this was simply a cliché, and more practical and rational calculations were at work in Byzantine society. In the Islamic regions, alms is one of the five obligations of believers, and the waqf is formulated by Islamic law. In addition to such religious justification, in China, donations to the community, such as to the lineage and charitable halls, raised the social status of donors. In Japan, donation was based on religion and custom, so there were no clear legal provisions.

4. Management of Donated Properties

4.1. *Who (or What Organisation) Managed Donated Properties?*

Management and operation of donated properties was entrusted to management organisations and trustees (Western Europe, Byzantine Empire, Islamic regions, China and Japan). Donors were able to retain their influence, such as by appointing a trustee. It was the executor who carried out the testator's bequest, but it is not clear to what extent he was involved in the management. In the case of the Byzantine Empire, it has been noted that the management organisation was a legal entity and had high independence, and that a system (*charistikia*) was created to integrate religious organisations that had fallen into a business crisis and to outsource their management to specific civilians (see 2.5 above).

A superintendent of the waqf (called *nāzir*, *mutawallī*) was appointed to manage the income of the properties and expenditure for the beneficiaries. Accounting reports must have been made, but only existed from the Ottoman period.

In China, from the time of the founding of the Fan Family Charitable Estate (Fانشi yizhuang 范氏義莊) in the eleventh century, the lineage had to choose a trustee from within its ranks to manage it (one person at first, later multiple). The same was probably true for other lineage fields. In some cases, a detailed account of income and expenditure was recorded in the clan register (*cichan bu* 祠產簿 etc.).

In Japan, the group or organisation, whether religious or secular, to which the land or other property had been donated, was responsible for its management, while in other cases, the donor retained certain interests and was responsible for its practical management and administration, and provided the beneficiaries with the profits.

4.2. *State/Government Intervention in the Management*

In all regions, the state did not directly intervene in the operation. Before the fif-

teenth century in Western Europe, the state was not involved with individual donations or charitable acts. The Byzantine state exempts its income from taxation. This would have been a favourable means to preserve family property, even if charitable expenses needed to be covered. It also served to prevent confiscation by a new emperor and as a defense against invasion by different ethnic groups.

In the Ottoman era, tax revenue itself became the waqf and it was administered as part of state finance management. In the waqf, the condition of donation is that it is the private property of an individual, registered in the Islamic court etc. In Iran waqfs closely connected to the state were managed by the state and integrated into the tax system. The state could dismiss superintendents in cases of fraud. In Central Asia under the Timurids and Shaybanids in the sixteenth century, there was a post called *şadr*, responsible for the religious affairs of the state. In addition, the title of *mutawallī-yi ʿāmm* (general superintendent) was mentioned in the waqf documents. The waqfs might have been under the jurisdiction of both, while the waqf documents of influential persons prohibited both officials from intervening in the waqf. Waqf was taxable unless it was granted tax exemption privileges. In fact, the documents recording the expenses of waqf income included repair costs for the waqf, and the salaries of staff to collect and manage the waqf income, as well as tax payments to the state.

In the case of the Fan Family Charitable Estate in China, the rules for managing the fields may have been endorsed by imperial decree. In addition, there seem to have been other occasions when local officials wrote commendations to give them authority. The illegal sale of lineage fields by descendants was prohibited by law, but logically this is no different to selling stolen goods.

In Japan, proceedings were sometimes brought to the imperial court and the samurai government when disputes over the rights of donated properties occurred. Similarly, disputes about the waqf were sometimes brought to Islamic courts. In general, normal management operations were left to the trustees and management organisations, which was an advantage of donation.

4.3. Gain of Political and Social Power

In Europe and China, there are no examples of donations leading to a gain of political influence. In Islamic regions, certain religious institutions and organisations may have accumulated economic wealth and had political and social influence such as the Bektashi and Mevlevi Order during the Ottoman period, and Imam Reza Mausoleum in Mashhad in the Safavid dynasty. More prominent were the manors of large temples and shrines in medieval Japan (after the eleventh century), some of which had ties with the imperial family, while in local communities they could use their ties with the central government to reject intervention by local authorities.

That meant residents could secure a stable livelihood.

In medieval India (eighth to thirteenth centuries) as well, imperial and subordinate rulers donated land (or land tax income) to religious clergy (such as Brahmins) and institutions to secure their authority to show their devotion to gods in donation inscriptions. In the Rastrakuta dynasty (till the tenth century), about three quarters of the copper plate charters issued by the royal families were in favour of Brahmins, and one quarter were granted in favour of Jain and Buddhist monasteries. From the eleventh century, the particular relationship between the local elites and regional deities became stronger [Schmiedchen 2011, 2018].

4.4. Privatisation and Embezzlement of Donated Properties

Cases of privatisation and embezzlement of donations by trustees and superintendents have been reported in all regions, such as financial crises in hospitals caused by the chaotic management of city-appointed directors in Florence and Northern France from the late Middle Ages to the sixteenth century. The question is whether they were accidental or attributable to the management system for donation. In Central Asia, usufruct of donated real estate was rented or sold. In the waqf, since the ownership of the real estate itself is fixed, it is easy to monetise usufruct, and it is possible to accumulate and privatise it, which is the structural cause of privatisation. Since the state was basically non-interventionist, as indicated in 4.2 above, there was ground for large-scale privatisation, as seen in the Arab region (madrasas in Damascus [Miura 2016]).

5. Other Features

5.1. Regional Feature of Donation

The act of donating is basically an individual act in any region. On the other hand, in the Byzantine Empire, it is defined as turning family wealth into a legal entity managed as a foundation, and in Islamic regions, the administration of the property is also entrusted to the individual. In China, rather than helping others, others are perceived of as an extension of oneself, just like a lineage. In Japan, by donation (similar to the family waqf), the authority of the deities and buddhas and superiors prevented the intervention of secular powers so that donors could retain and inherit their assets. In the Ottoman state and Central Asia, cash waqfs were donated and managed by interest-bearing loans. In Central Asia, repurchase selling (an immovable property is sold and repurchased within a fixed term) was frequent; this is pawning the property so that the pawnee gains the rent of the property.

5.2. *Attractive Cases*

Donors get prebends (stipend) from the hospitals they donate to (in Bruges, Western Europe). Chitwood's paper in this book reports annuity endowments by major sovereigns for monasteries in the Byzantine Empire, but even the waqf can be considered a pension for donors and their families, receiving as they do regular portions of the profit from donated properties.

Comparing urban and rural areas, in the Byzantine Empire most of the donated properties were in rural areas, while many of the beneficiaries—religious and charitable institutions—were located in cities, and members of the trustee organisation (including the donor's family) were city dwellers. This is in common with the waqf system, bringing rural resources to cities.

In Japan, there are “loan donations” that donate loans (debts), and “sales donations” that avoid recovery by taking the form of donations while actually being a sale: the donor made a donation deed and a sales deed at the same time. As in the waqf, these were expected to have the effect of perpetuity (irretrievability) of the donated property.

The mechanism reconciling the regulations of Islamic law and regional customs regarding how donated property was actually managed is suggestive of what Islam is as a culture.

5.3. *Comparative Finding*

In China, a transcendental idea of God does not play a central role in donation. Of course, buddhas and deities are mentioned in donations made to Buddhist and Daoist temples, but there seems to have been a more worldly focus, that is, if you do good deeds, you will have rewards in this life.

In contrast to the waqf, donations in Japanese medieval society, while mixed with acts of charitable and religious purposes, were mainly made to avoid the government's legal restrictions. The main purpose was to separate a specific secular person from the ownership of land or other property (or be perceived as so doing) in order to avoid taxation, unwanted control, oppression or intervention by the government and to increase the certainty that the core of the rights held by the donor would be inherited by a specific person on the basis of his or her own will.

A comparative study of waqf is necessary because of the variety in waqf donation in different regions and periods. When comparing waqf to donation in other regions, rather than simply comparing parallel cases from different regions, we should focus on cultural proximity and similarities (for example, donation in

monotheistic religions, donation in the Mediterranean sphere).

Concluding Remarks: An Assumption Model

Table 2 summarises the differences between the thirteen items of donation in eight regions, based on the waqf in the Arab region. Here, the system and situation in the Arab region are used as the standard (2 points), and if items are the same, they are given 2 points, and if there is a difference, the difference is expressed as a numerical value (1 or 0). The criteria for each item is written after the item name, indicating whether the donor is an individual, whether or not cash is allowed for the donated property, and whether or not the donor can be designated as a beneficiary. Diagram 1 shows this as a radar graph. The following is a hypothetical tentative model.

The total score for the Arab region is 26 points, 2 points \times 13 items. Japan (22 points), Central Asia and the Byzantine Empire (21 points) have a total score close to this, and Western Europe (18 points) exhibits the largest difference. Of course, this is only my evaluation based on the contents of each respondent's answer, and there may be different evaluations for each item. It can be seen that there are differences in the application and actual conditions of the waqf between the Arab region, Ottoman Turkey, Iran, and Central Asia in the early modern period.

Table 2. Comparison of Donations in Eight Regions Based on the Arab Region as Standard

Item/standard criteria	WE	BY	AR	TU	IR	CA	CH	JP
Donor/individual	2	2	2	2	2	2	2	2
Properties/cash	1	1	2	2	0	2	1	2
Beneficiary/donor	1	1	2	1	1	1	2	2
Law/existing	1	2	2	2	2	2	1	1
Procedure/deed	2	2	2	2	2	2	1	2
Reason of spread/urban	2	2	2	2	2	2	2	2
Wide spread	1	2	2	1	1	1	2	2
Social relation/patronage	1	2	2	1	1	1	1	2
Justification/religious	2	2	2	2	2	2	1	1
Management/donor	1	2	2	1	2	2	2	2
State intervention/weak	2	1	2	1	2	2	2	1
Political power/weak	1	2	2	1	1	1	2	1
Privatisation/eminant	1	0	2	1	1	1	1	2
Total points	18	21	26	19	19	21	20	22

WE: Western Europe, BY: Byzantine Empire, AR: Arab region, TU: Ottoman Turkey, IR: Iran, CA: Central Asia, CH: China, JP: Japan

Regional Differences

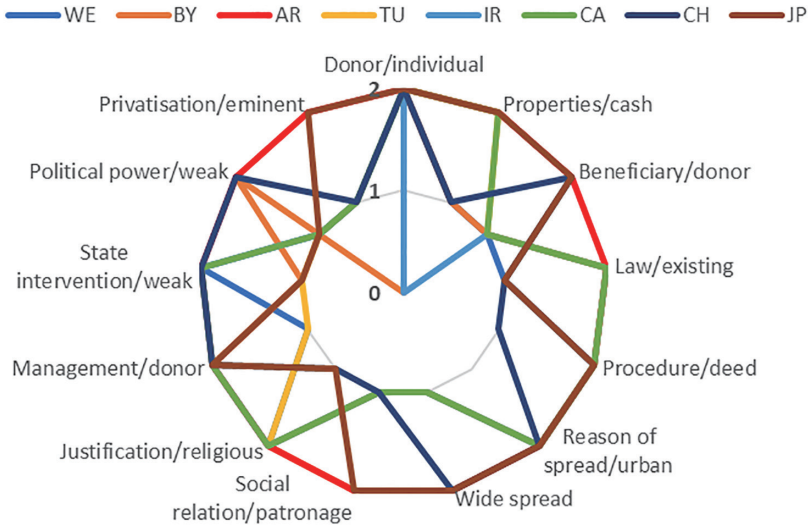
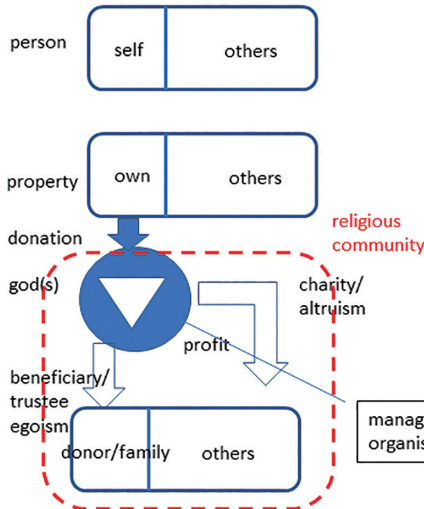


Diagram 1. Regional Comparison

WE: Western Europe, BY: Byzantine Empire, AR: Arab region, TU: Ottoman Turkey, IR: Iran, CA: Central Asia, CH: China, JP: Japan

transcendental (Christianity, Islam, Japan)



concentric (China)

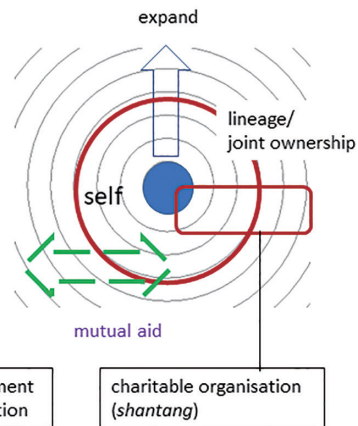


Diagram 2. Two Models of Donation Strategy

Although this is tentative, the closeness between the waqf in the Arab region and donation in Japan and the Byzantine Empire—compared to the Ottoman Empire (Turkey) and Iran—is noteworthy. The main purpose of the three was inheritance of the property of the donor family. Of course, despite being so designed, donations and donated property contributed to religious institutions and philanthropic projects as well.

In China, the self and others were consciously connected in a concentric circle, and property rights were also conceived as a concentric circle. In contrast to this, in the monotheistic world, or in medieval Japan, the property rights of donors were strong in principle, so in order to use the property for other purposes, it would have been necessary to separate it from its original owner, by the form of donating it to a deity [Diagram 2].

In modern Islamic regions, the waqf system was reformed. The family waqf was abolished and the charitable waqf survived under state control, as the Ministry of the Waqf was established in the Ottoman Empire (In the case of Egypt, see Takaiwa's paper in this book). In Southeast Asia and India, under British rule, a charitable waqf system for religious institutions was created [Jafri 2018; Alias 2018; and Ninomiya's paper in this book]. The reasons for the reform were that the waqf, which stopped the transfer of ownership, was criticised for its incompatibility with the capitalist economy and its inefficient management by donors and trustees. This reform abolished the egoistic and altruistic waqf and restricted the waqf to altruistic (charitable) purposes. According to annual statistical data of the Ministry of Waqf in Egypt during sixty years (1897–1958) after the reform of the waqf, the revenue of the Ministry was spent on the management of mosques and public education. The revenue amount was usually influenced by markets trends, for it came from the rents of land and buildings, similar to the waqf in premodern times. It means the waqf still had a role connecting social welfare and personal interest even after abolition of family waqf [Katō 2023].

Looking back on history in this way, the difference in donation systems in each region can be said to be the difference in strategy of how to balance egoism and altruism. For example, does it allow the donor's own interests to be maximised, or does it allow cash interest-bearing operations? However, all donation schemes were both egoistic and altruistic. They revitalised the market economy centred on the city and played the role of a safety net. If the modern capitalist economy is based on the idea of separating egoism and altruism, all the donation systems mentioned here would have been forced to close as this idea permeated society.

Kanazawa Shusaku, a Japanese scholar who studies charity in modern Britain, describes charity in terms of the following three feelings. (1) I want to do

something for people in need. (2) When in difficulty, I would be happy if someone could help me. (3) It gives me comfort to see others in need being helped [Kanazawa 2021]. In Europe, as the way of charity changed over time, these feelings were mediated by the urban community in ancient times, were in a religious community mediated by God in the Middle Ages, but in the modern period, they were furthermore mediated by the society or community to which one belongs. He notes that the “charitable use” in England (a system in which the donor decides the purpose of use and entrusts the real estate to the trustee) during the transition from the Middle Ages to the early modern period is similar to the charitable waqf in Islam. In the Islamic regions, was there any change of feelings on the subjects and process of charity from the medieval to the modern era? How was it in China and Japan? As already discussed, the NPO organisations collect donations for charity and mutual aid, calling it waqf in Islamic regions. Further studies on donation and endowment in the modern and contemporary times should be conducted from comparative perspectives.

The Respondents of the Japanese Research Group

KAWAHARA Atsushi (The Open University of Japan): Medieval Europe (The Netherlands and Northern France, thirteenth to sixteenth centuries)

OTSUKI Yasuhiro (Hitotsubashi University): Byzantine Empire

IGARASHI Daisuke (Waseda University): Medieval Egypt (Mamluk period)

MIURA Toru (Toyo Bunko): Syria, twelfth to twentieth centuries

OKAWARA Tomoki (Tohoku University): Syria, sixteenth to twentieth centuries

HAYASHI Kayoko (Tokyo University of Foreign Studies): Ottoman Turkey

KONDO Nobuaki (Tokyo University of Foreign Studies): Iran, sixteenth to nineteenth centuries

ISOGAI Ken'ichi (Kyoto University): Central Asia, sixteenth to early twentieth centuries

KISHIMOTO Mio (Toyo Bunko): Premodern China, Ming-Qing periods, fifteenth to nineteenth centuries

TAKAHASHI Kazuki (Meiji University): Japan, twelfth to sixteenth centuries

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* The bibliography is made by the collaboration of Japanese respondents and Sanjukta Datta (Ashoka University in India).

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