

# Primacy and Unity in Orthodox Ecclesiology

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The question of universal primacy is a central ecclesiological issue of our time. According to Metropolitan John (Zizioulas) of Pergamon, "The issue of primacy is perhaps the most important ecumenical problem."<sup>1</sup> A recent agreed statement of the World Councils of Churches shows that, while some degree of ecumenical consensus exists on the issue, much work remains to be done:

Whenever people, local communities or regional churches come together to take counsel and make important decisions, there is need for someone to summon and preside over the gathering for the sake of good order and to help the process of promoting, discerning and articulating consensus. Synods and councils of all times and in all churches demonstrate this clearly. The one who presides is always to be at the service of those among whom he presides for the edification of the Church of God, in love and truth. It is the duty of the president to respect the integrity of local churches, to give voice to the voiceless and to uphold unity in diversity.<sup>2</sup>

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## Primacy in Orthodox-Roman Catholic Dialogue

A joint commission of Orthodox and Catholic theologians recognized the prerogative, within the context of conciliarity, of "the bishop of Rome as protos among the patriarchs". Reference (<http://www.zenit.org/article-21012?l=english>) .The Joint Commission for Theological Dialogue reached the agreement in a meeting in Ravenna, Italy in October 2007. This is not the same as saying, as some press reports of the document have suggested, that "the Pope has primacy over all bishops, though disagreements about the extent of his authority still continue". Reference (<http://www.speroforum.com/site/article.asp?id=12208>) The commission went on to state that: "It remains for the question of the role of the bishop of Rome in the communion of all the Churches to be studied in greater depth. What is the specific function of the bishop of the "first see" in an ecclesiology of koinonia and in view of what we have said on conciliarity and authority in the present text? How should the teaching of the first and second Vatican councils on the universal primacy be understood and lived in the light of the ecclesial practice of the first millennium?" (para 43). What is interesting here however is the apparent readiness of the Roman Catholic participants to consider the possibility of interpreting the decisions of the two Vatican councils (including presumably the statements of Vatican 1 on papal primacy) in the light of ecclesial practice of the first millennium.

Papal primacy is often recognized as the greatest single issue dividing the Eastern and Western churches. Fr. John Meyendorff wrote that "The whole ecclesiological debate between East and West is thus reducible to the issue of whether the faith depends on Peter, or Peter on the faith."<sup>3</sup> Pope Paul VI said that "the pope...is undoubtedly the most serious obstacle on the path of ecumenism."<sup>4</sup>

Primacy is an especially pertinent issue in Orthodox-Roman Catholic dialogue. This is not only the case because discussions of primacy naturally begin with the Roman Catholic concept as a point of departure, but also because of some important recent developments. In the 1995 encyclical *Ut Unum Sint*, Pope John Paul II wrote:

Whatever relates to the unity of all Christian communities clearly forms part of the concerns of the primacy....I am convinced that I have a particular responsibility in this regard, above all in acknowledging the ecumenical aspirations of the majority of the Christian Communities and in heeding the request made of me to find a way of exercising the primacy which, while in no way renouncing what is essential to its mission, is nonetheless open to a new situation (§95).

However skeptical one may be about the actual application of the Pope's words, nevertheless such openness to dialogue is unprecedented. Many Orthodox theologians have felt a need to respond thoughtfully, for, as Fr. John Meyendorff writes, "the issue placed by the papacy before the consciousness of all Christians is that of a world Christian witness."<sup>5</sup>

## **Primacy and Communion Ecclesiology**

In order to provide some context, it is worth noting that an important concept underlying much of the ecumenical discussion on the subject of primacy is "communion ecclesiology." Popular in ecumenical circles, it has been enthusiastically accepted by Catholics and Orthodox, who are also responsible for laying some of its basic

foundations. Zizioulas, for example, in his book *Being as Communion* draws on the Eastern Church Fathers to define Christian life within the framework of "communion."

The Orthodox-Roman Catholic Bilateral Consultation in the U.S.A. issued "An Agreed Statement On The Church" in 1974 which describes the basic premise of "communion ecclesiology": "The Church is the communion of believers living in Jesus Christ and the Spirit with the Father. It has its origin and prototype in the Trinity in which there is both distinction of persons and unity based on love, not subordination."<sup>6</sup> This is further illustrated in a document published in 1982 by the Joint International Commission entitled "The Mystery of the Church and of the Eucharist in light of the Mystery of the Holy Trinity."<sup>7</sup>

The influence of this kind of ecclesiological outlook is fundamental to many modern discussions of primacy. For example, Zizioulas writes:

For such a primacy to be accepted and applied an ecclesiology of communion rooted deeply in a theology, and even an ontology of communion, would be necessary. I believe that the 2nd Vatican Council has made an historic advance in this direction, and we can proceed in the deepening of such a theology of communion and apply it to all matters still dividing us, including that of the Roman primacy.<sup>8</sup>

## **Many feel a need for Primacy**

When John Paul II proposed the question, "Do not many of those involved in ecumenism today feel a need for such a ministry?"<sup>9</sup> in 1995, many Orthodox answered strongly in the affirmative. The question of primacy is not only an important ecumenical topic, but a need to examine the issue is keenly felt within Orthodoxy. Fr. Meyendorff states:

A united witness of the universal episcopate of the Church is not simply a pragmatic necessity, but a sign that the Holy Spirit did not abandon the Church... the unity and coherence of [the Church's] witness, the service to the world which it implies, the common action which it requires, can be assured only if the episcopate remains one. The function of the "first bishop" is to serve that unity on the world scale, just as the function of a regional primate is to be the agent of unity on a regional scale.<sup>10</sup>

The need for a united witness of the Church is a primary consideration. Many have called for renewed thinking about the very concept of primacy itself.

## **An Orthodox Vision of Primacy**

In what ways does the Orthodox understanding of primacy differ from the Roman Catholic view? The Orthodox perspective is rooted in principles drawn from the early canonical tradition. It is worth mentioning that even within Orthodoxy the question deals first and foremost, because of historical considerations, with the legitimate primacy exercised by Rome before the schism.

## **The Theological Necessity of Primacy**

Orthodoxy has never accepted Rome's self-supported claims of universal jurisdiction, but has always rebuffed them. A closer examination, however, reveals the many subtleties of the issue. As Thomas FitzGerald wrote, "Orthodox theologians have not rejected the concept of primacy, but only its development by the Church of Rome."<sup>11</sup>

An understanding of corporate personality is important for any study of primacy. Zizioulas writes: "The idea of the incorporation of the 'many' into the 'one,' or of the 'one' as a representative of the 'many' goes back to a time earlier than Paul."<sup>12</sup> More directly, he says, "Bishops are not to be understood as individuals, but as heads of communities."<sup>13</sup> This would necessitate a single representative showing forth the unity of the episcopate. There is another important point here: that primacy belongs to a see, not to an individual. As Zizioulas states: "In an ecclesiology of communion, we have not a communion of individuals, but of churches."<sup>14</sup>

The Orthodox understanding of primacy is rooted in the need for taxis. Meyendorff explains:

It is a fact, however, that there has never been a time when the Church did not recognize a certain "order" among first the apostles, then the bishops, and that, in this order, one apostle, St. Peter, and later, one bishop, heading a particular church, occupied the place of a "primate."<sup>15</sup>

Zizioulas says that the question of Roman primacy must be approached theologically rather than historically; if primacy was only contingent on historical developments, then it could not be viewed as a necessity for the Church.<sup>16</sup> His question is, does Roman Primacy belong to the esse of the Church or is it only for her bene esse?

## **Hierarchy and Conciliarity**

Fr. Schmemmann wrote: "hierarchy is the very form of conciliarity."<sup>17</sup> He sees this as mirroring the divine life of the Trinity. Hierarchy and conciliarity should not be opposed, but go together: "the hierarchical principle belongs to the very essence of the council..."<sup>18</sup>, and Orthodox church government must be rooted in a "conciliar ontology."<sup>19</sup> Zizioulas maintains that "The synodal system is a 'sine qua non conditio' for the catholicity of the Church."<sup>20</sup>

Schmemmann explains this well: "hierarchy is, above everything else, the mutual recognition of persons in their unique, personal qualifications, of their unique place and function in relation to other persons, of their objective and unique vocation within conciliar life. The principle of hierarchy implies the idea of obedience but not that of subordination..."<sup>21</sup> He concludes: "To oppose these two principles is to deviate from the Orthodox understanding of both hierarchy and council."<sup>22</sup>

## **Multiple levels of Primacy**

This synodal structure is essential for the whole Church, going much deeper than the universal level. "At the local, regional, and global levels of the Church's life, primatial leadership exists to build up the unity of the Church and the communion of sister Churches."<sup>23</sup> Our main concern here will be with universal, rather than regional primacy, or primacy as exercised within an autocephalous church. The system of Patriarchates comes closer, but is still not quite what we are looking at. Zizioulas demonstrates that this system, no matter how venerable and ancient, was never theological in a strict sense.<sup>24</sup>

## **The fundamental identity of the episcopate**

Professor John Erickson points out that the Orthodox understand all bishops, not just the bishop of Rome, to be the successors of Peter, and mentions that Patriarch Bartholomew has recently reiterated his explicit rejection of the Catholic interpretation of the "keys of Peter."<sup>25</sup> In Orthodox ecclesiology, all bishops possess a fundamental equality, even if, because of practical reasons, some are given a higher position than others. This is an example of where Orthodox ecclesiology differs from Roman Catholic teaching in an important way.

## **Primacy of honor not without authority**

Metropolitan John Zizioulas says that the phrase "primacy of honor" often used by Orthodox may be misleading, because the exercise of primacy necessarily involves actual duties and responsibilities.<sup>26</sup> The primacy exercised by the Patriarch of Constantinople, for example, has included such things as the right to convoke councils in cooperation with the other Patriarchs, and an emergency right of intervention when help is requested by another Patriarchate:<sup>27</sup>

"In response to the present Roman Catholic understanding of the Petrine Office, Orthodox theologians have not rejected the concept of primacy but only its development by the Church of Rome. Among the Orthodox, there has been an attempt to recognize the various expressions of primatial leadership in the life of the Church, and to place primacy within the framework of conciliarity."<sup>28</sup>

Professor Erickson points out that for the Orthodox, Roman primacy has been understood as a pragmatic, rather than theological, issue, growing out of a principle of accommodation.<sup>29</sup> Honor and primacy must be linked to ministry and service, and the Pope must function as head of his see, as one who is among, rather than over, the other bishops. Again, primacy involves more than simply "honor," but is linked to a universal pastoral concern, a "presidency in love." This means leadership, not juridical authority.<sup>30</sup>

<sup>31</sup> they nevertheless contain principles applicable to universal primacy as well. Zonaras observes:

"Just as bodies, if the head does not maintain its activity in good health,

function faultily or are completely useless, so also the body of the Church, if its preeminent member, who occupies the position of head, is not maintained in his proper honor, functions in a disorderly and faulty manner."<sup>32</sup>

Zonaras also mentions the prime importance of harmony among all, bound together by the bond of love.<sup>33</sup>

From the time of the first Ecumenical Council on, Byzantine canon law had always assigned primacy of honor to Rome, for example Nicea canon 6.<sup>34</sup> Even when the capital of the Empire was moved to Constantinople, the "new Rome," the priority of the old Rome was safeguarded. Constantinople 3 states: "As for the Bishop of Constantinople, let him have the prerogatives of honor after the bishop of Rome, seeing that this city is the new Rome."<sup>35</sup> Even when Anna Comnena, daughter of Emperor Alexis I, tried to interpret "after" in a purely chronological sense, she was corrected by both Zonaras and Balsamon, who maintained that "after" certainly shows hierarchical inferiority.<sup>36</sup>

Meyendorff summarizes the "privileges" spoken of in Constantinople canon 3:

...this ministry was always understood in moral terms, rather than in terms of formal power, or rights. The actual exercise of this power depended upon political circumstances, as well as the orthodoxy, the wisdom, and the prestige of the "first bishop" himself... it is only when the "Old Rome" decisively and consistently pretended to transform its moral "privilege" into actual jurisdictional and doctrinal power that the Orthodox East refused to allow it.<sup>37</sup>

Chalcedon canon 28 is also notable. It says, in part:

The fathers in fact have correctly attributed the prerogatives to the see of the most ancient Rome because it was the imperial city. And thus moved by the same reasoning, [we] have accorded equal prerogatives to the very holy see of New Rome, justly considering that the city is honored by the imperial power and the senate and enjoying the prerogatives equal to those of old Rome, the most ancient imperial city, ought to be elevated as Old Rome in the affairs of the Church, being in the second place after it.<sup>38</sup>

## **The Principle of Accommodation**

Notice that the phrase "because it was the imperial city" lends no credence to any argument for primacy based on apostolic foundation.<sup>39</sup> Meyendorff also makes the point that there were many cities of apostolic origin in the East, none of which claimed primatial authority. He writes: "Antioch, Corinth, Thessalonica, and many other churches were founded by apostles, but never claimed primacy based on this fact."<sup>40</sup> But he is quick to point out that such accommodation is not the only criterion.<sup>41</sup>

## **What if Roman Primacy were Reinstated?**

There are a variety of approaches to what a resuscitated Roman primacy would look like. Erickson writes that it might be possible for the Orthodox to accept the view of Papal primacy which developed in the West in the second millennium as legitimate within its historical context.<sup>42</sup> He says that "Agreement in principle on some aspects of primacy may be on the horizon."<sup>43</sup> He describes *Ut Unum Sint* as a welcome sign which has reopened discussion of primacy,<sup>44</sup> and calls for a "deeper exploration of the meaning of primacy for the ongoing life of the Church..."<sup>45</sup>

Zizioulas makes that point that "A universal primus exercising his primacy in such a way is not only useful to the Church but an ecclesiological necessity in a unified Church."<sup>46</sup>

He says that ascribing universal primacy to Rome would not be problematic if it was "fundamentally qualified."<sup>47</sup> For him, this means that Rome should not interfere in the autonomous life of the other Churches, and that primacy should be exercised in a synodical context, acting in consensus with the other bishops in matters that concern more than just the local (or regional) church. He discounts the view that a revived Roman primacy would be merely a "Western Patriarchate," and points out some of the problems that arise if Rome is viewed as merely "Western." It would be too confusing a "scheme of division" and could not claim a theological *raison d'être*.<sup>48</sup>

He presents an articulate vision of what a Roman primacy along Orthodox lines would mean:

...the universal primacy of the Church of Rome would mean in the first instance that the Bishop of Rome will be in cooperation on all matters pertaining to the Church as a whole with the existing patriarchs and other heads of autocephalous churches. His primacy would be exercised in communion, not in isolation or directly over the entire Church. He would be the President of all heads of churches and the spokesman of the entire Church once the decisions announced are the result of consensus.

## **In Summary**

Bishop Kallistos Ware points out two short formulae that may be helpful in summing up the eastern attitude towards primacy: "Among the bishops, the pope is the elder brother, in the absence of the father", and, "The pope is the mouth of the Church and of the episcopate."<sup>49</sup> These two pithy sayings capture in many ways the approach many Orthodox would take toward this topic.

## **Primacy within Orthodoxy Today**

Our historical understanding of Roman Primacy is one thing, but how do we understand the role of the Ecumenical Patriarch today? For, as Meyendorff states, "After the schism, Constantinople was left with primacy in Orthodoxy."<sup>50</sup> There remains a need to look at some of these difficulties posed by the question of the role of the Ecumenical Patriarch in the modern Orthodox world.

Surely it is not enough to rest on history. Fr. John Meyendorff states: "...since Byzantium does not exist anymore, it is simply meaningless to attempt a definition of the rights of the ecumenical patriarchate in Byzantine terms."<sup>51</sup>

Michael Fahey describes the contemporary functioning of the Ecumenical Patriarchate. The Patriarch is elected by an endemousa (permanent) synod of twelve members, presided over by the Patriarch. "The synod addresses matters of moment to the patriarchate and, because of the primacy of this patriarchal church, it also discusses many far-reaching matters crucial to the life of Orthodoxy worldwide."<sup>52</sup> Fahey outlines four ways the Ecumenical patriarch, along with his synod, has exercised primacy in recent years: 1) promotion of Orthodox unity and pan-Orthodox cooperation. 2) by agreeing to hear appeals from other local churches. 3) through ecumenical initiatives, and 4) through pastoral care of the diaspora.

## **The ministry of unity**

Among the four functions enumerated by Fahey, two have to do with the ministry of unity. One concern here is the question of who should speak for the Orthodox. Thomas FitzGerald, in a booklet entitled *The Ecumenical Patriarchate and Christian Unity* discusses the role of the Ecumenical Patriarch within Orthodoxy as its visible representative and spokesman. A statement in the front of the book by Patriarch Bartholomew reads: "Our Ecumenical Throne is fully aware of its historic heritage and of its responsibility, by the Grace of God, to do whatever is possible, to serve the unity of the Church"<sup>53</sup>

## **Synodal organization**

The danger in having an endemousa synod is that it would not be truly representative. Meyendorff has stated: "In some churches...the so-called 'permanent synod' ceased to promote conciliarity and has become an organ of bureaucratic administration exercising power over other bishops."<sup>54</sup> He presents what he thinks such a synod today should look like. He says: "The normal functioning of an Orthodox primacy in the modern world would clearly require a permanent representation of all Orthodox churches in a consultative body around the patriarch and, in general, an international staff."<sup>55</sup>

Meyendorff mentions that there are some voices advocating a transfer of primacy to places like New York or Moscow.<sup>56</sup> He states: "It would, of course, be preferable for the patriarchate to remain in the inimitable glorious setting of Constantinople, but its very survival as an institution is more important than those historical considerations, and it is clear that the organization of a real world center would be much easier to realize elsewhere."<sup>57</sup>

## **Hearing appeals**

Chalcedon canons 9 and 17 describe the authority of the see of Constantinople to hear appeals. This has certainly caused some problems in contemporary church life. Lewis Patsavos clarifies the view of the Ecumenical Patriarchate: "In both cases, bishops and



other clergy dissatisfied with their metropolitan are not compelled by the council to appeal to the see of Constantinople, but thereby overturning the decision of the exarch of the diocese. On the contrary, they are given this option only if they so desire."<sup>58</sup>

## Territorial Limits

Too often, the "pastoral care of the diaspora" has seemed more like a ploy for power. The question of territorial limits is a hotly debated today. Based on a certain interpretation of the term "barbarians" I Chalcedon canon 28, the Ecumenical Patriarch has tried to argue in recent years for jurisdiction over the "diaspora." Troitsky and L'Huillier offer extensive treatments about the proper interpretation of this canon.<sup>59</sup> Nevertheless, the question remains: Does Constantinople have a certain jurisdiction over the "diaspora" not otherwise in the "territory" of another mother-church? Many would say yes. While shying away from the full brunt of the Constantinopolitan position, Lewis Patsavos defends this fundamental right to hear appeals, saying: "Constantinople has always maintained that the canonical legacy of the Fourth Ecumenical Council proves without a doubt... areas not claimed by a specific ecclesiastic jurisdiction were under the authority of the bishop of Constantinople."<sup>60</sup>

## Conclusion

Throughout this article we have examined various nuances of an Orthodox approach to the issue of primacy. The subject is frustrating, because our theory seems quite distant from the actual reality of church life. We may hope, however, that by keeping this vision alive our Church will one day grow into its own theology.

## See also

- Timeline of Orthodox Church and Roman Catholic relations

## Footnotes

[1] John Zizioulas, "Primacy in the Church" *Eastern Churches Journal* 5:2 (Summer 1998), p. 116.

[2] Commission on Faith and Order, "Faith and Order Paper No. 181: The Nature and Purpose of the Church: A stage on the way to a common statement" (Geneva: WCC/Faith and Order, 1998), p. 54 (§109).

[3] John Meyendorff, *Byzantine Theology* (New York: Fordham Univ. Press, 1979), p. 98.

[4] John P. Galvin, "Comments on Metropolitan John's 'Primacy in the Church'" *Eastern Churches Journal* 5:2 (Summer 1998), p. 21.

[5] John Meyendorff, "The Ecumenical Patriarchate: Yesterday and Today" in *The Byzantine Legacy of the Orthodox Church* (Crestwood, NY: SVS Press, 1982), p. 254.

- [6] In John Borelli and John H. Erickson, *The Quest for Unity: Orthodox and Catholics in Dialogue* (Crestwood, NY: SVS Press and Washington, D.C.: U.S. Catholic Conference, 1996), pp. 84-85.
- [7] Also in Borelli and Erickson, pp. 53-64.
- [8] Zizioulas, "Primacy," p. 20.
- [9] Pope John Paul II, "Ut Unum Sint" *Origins* 25:4 (8 June 1995), §97.
- [10] Meyendorff, "The Ecumenical Patriarchate," p. 245.
- [11] Thomas FitzGerald, "Orthodox Theology and Ecumenical Witness" *SVTQ* 42:34 (1998), p. 353.
- [12] John Zizioulas, *Being as Communion* (Crestwood, NY: SVS Press, 1985), p. 145.
- [13] Zizioulas, quoted in Michael Fahey, S.J., "Eastern Synodal Traditions: Pertinence for Western Collegial Institutions," in T. Reese, ed. *Episcopal Conferences: Historical, Canonical, and Theological Studies* (Washington, D.C.: n.p., 1989), p. 225.
- [14] Zizioulas, "Primacy," p. 124.
- [15] Meyendorff, "The Ecumenical Patriarchate," p. 244.
- [16] Zizioulas, "Primacy," p. 17.
- [17] Alexander Schmemmann, "Towards a Theology of Councils" in *Church, World, Mission* (Crestwood, NY: SVS Press, 1979), p. 177.
- [18] *Ibid.*, pp. 165.
- [19] *Ibid.*, p. 164.
- [20] Zizioulas, "Primacy," p. 120.
- [21] Schmemmann, "Towards a Theology of Councils," p. 165.
- [22] *Ibid.*
- [23] FitzGerald, "Orthodox Theology," pp. 353-354.
- [24] Zizioulas, "Primacy," 122.
- [25] John H. Erickson, "First Among Equals: Papal Primacy in an Orthodox Perspective" *Ecumenical Trends* 2:2 (Feb. 1998), p. 1.
- [26] Zizioulas, "Primacy," pp. 17-18.
- [27] *Ibid.*, p. 16.
- [28] FitzGerald, "Orthodox Theology," p. 353.

[29] Erickson, "First Among Equals," p. 5.

[30] Ibid.

[31] Panteleimon Rodopoulos, "Ecclesiological Review of the Thirty-Fourth Apostolic Canon" *Kanon IV:1* (1980), p. 92.

[32] Quoted in Rodopoulos, p. 93.

[33] Rodopoulos, p. 99.

[34] See, for example, Nicea canon 6 with commentary, in Archbishop Peter L'Huillier, *The Church of the Ancient Councils* (Crestwood, NY: SVS Press, 1996), pp. 45ff.

[35] Quoted from L'Huillier, p. 199. See also his comments on the whether there was any negative response concerning this in the West.

[36] John Meyendorff, "The Council of 381 and the Primacy of Constantinople" in *Catholicity and the Church* (Crestwood, NY: SVS Press, 1983), pp. 132-133. Also see L'Huillier, p. 373.

[37] Meyendorff, "Council of 381," p. 138.

[38] From L'Huillier, p. 267f.

[39] See, for example, Meyendorff's discussion of this topic in "The Ecumenical Patriarchate," p. 239f. and "Council of 381," p. 131f.

[40] Meyendorff, "Council of 381," p. 131.

[41] Meyendorff, "The Ecumenical Patriarchate," p. 240.

[42] Erickson, "First Among Equals," 9.

[43] Ibid., p. 7.

[44] Ibid., p. 9.

[45] Ibid.

[46] Zizioulas, "Primacy," p. 120.

[47] Ibid., p. 118.

[48] Ibid., p. 123.

[49] Kallistos Ware, "Primacy, Collegiality, and the People of God" in A.J. Philippou, ed. *Orthodoxy: Life and Freedom, Essays in honour of Archbishop Iakovos* (Oxford: Studion Publications, 1973), p. 199.

[50] Meyendorff, "The Ecumenical Patriarchate," p. 244.

[51] Ibid., p. 254.

[52] Fahey, p. 258.

[53] Ecumenical Patriarch Bartholomew, quoted in Thomas FitzGerald, *The Ecumenical Patriarchate and Christian Unity* (Brookline, MA: Holy Cross, 1997), preface.

[54] Meyendorff, "The Ecumenical Patriarchate," p. 242 (emphasis original).

[55] *Ibid.*, pp. 254-255.

[56] *Ibid.*, p. 253.

[57] *Ibid.*, p. 255.

[58] Lewis Patsavos, "The Primacy of the See of Constantinople in Theory and Practice" *GOTR* 37:3-4 (1992), p. 240.

[59] See Sergei V. Troitsky's "The Limits of the Authority of the Patriarch of Constantinople over the Diaspora" in Sourozh, and L'Huillier, pp. 267-296.

[60] Patsavos, 244.

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