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The Regulation of Religious Communities in the Late Middle Ages: A Comparative Approach to Ming China and Pre-Reformation England

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Received: 19 October 2020; Accepted: 12 November 2020; Published: 14 November 2020



Abstract: This article examines the regulation of religious life in the late Middle Ages (14th and 15th centuries), focusing comparatively on Catholic monastic communities in pre-Reformation England and Buddhist monasticism in early Ming China. This comparative approach to two of the most important monastic traditions across Eurasia allows us to problematize the paradigm of ideas and praxes surrounding monastic self-governance in Latin Christendom and to integrate the current scholarship on Ming regulation of religious communities by investigating the pivotal changes in imperial religious policies taking place in the early period of this dynasty. We find that monks and secular authorities at the two ends of Eurasia often shared the same concerns about the discipline of religious men and women, the administration of their properties, and the impact of these communities on society at large. Yet, the article identifies significant differences in the responses given to these concerns. Through the analysis of primary sources that have thus far been overlooked, we show how in early Ming China the imperial government imposed a strict control over the education, ordination and disciplining of Buddhist monks. This bureaucratic system was especially strengthened during the reign of Zhu Yuanzhang (r. 1368–1398), when the figure of the Monk-Official and other tools of secular regulation were introduced, and limits to property claims and economic activities of monasteries were imposed. Instead, during the same period, English monasteries benefited from the previous disentangling of the Church from secular political authorities across Europe. In fact, in late medieval England, the Benedictine tradition of self-governance and independence from the secular sphere was arguably even more marked than in the rest of the continent.

Keywords: China; England; late Middle Ages; monasticism; Eurasian religions; regulation of religious life; Christianity; Buddhism

1. Introduction

Since at least the 1990s, one of the most interesting and important trends in the field of medieval studies has been the development of a global approach to the Middle Ages, and in particular the production of comparative histories on a Eurasian scale.¹

In this paper, we aim to sketch similarities and differences in the regulation of monastic communities in Ming China (1368–1644) and pre-reformation England.² Focusing on the 14th and

¹ This trend is observable since the work of (Silber 1985, 1995). See also a splendid essay by (Lieu 1984, pp. 113–47). More recently, important contributions include (Liu 2012; Keene 2019; Hermans 2012).

² This paper concentrates on Chinese Buddhism, the Tibetan Buddhism and other sects are excluded from the current discussion.

15th centuries, we want to present a transcultural analysis of different and yet historically comparable processes that embody change and continuity in the relations between states and monasteries. “Community” is a particularly useful transcultural concept to compare interrelated social and symbolic categories of identification and belonging that are at work on diverse social levels.³ It is true that the term monastery/monastic carries with it a significant cultural baggage in the context of European religious practices. Admittedly, the Buddhist monasteries of the Ming Empire were not “monasteries” in the European sense, but the relationship between religious communities and secular governments were arguably of the same relevance for the respective religious groups. Therefore, this paper avoids a full discussion of the theological or philosophical underpinnings of Benedictine and Buddhist monasticism, instead preferring to offer reflections at the institutional level. The regulation of religious communities might vary across space and time, and yet the relationship between the secular authority and monastic communities is consistently significant from the very beginning of the medieval period.

There is already important literature on late medieval monasticism in England,⁴ and several excellent studies on Ming policy towards Buddhism are also available.⁵ Timothy Brook has studied the social and cultural context as well as the function of gentry patronages of Buddhism in the 16th and 17th century, and he suggests that the Ming Dynasty’s policy brought rupture between Sangha and secular society.⁶ This paper aims to integrate this research, by expanding our understanding of an earlier phase in Ming governance, in order to trace the establishment, success, and final collapse of the Ming Buddhist policy from the 1350s to the 1450s. With regard to this subject, some Chinese scholars, especially He Xiaorong and Zhao Yifeng, have contributed systematic summaries, which offer a solid preparation for further exploration of the Buddhism policy in the Ming Dynasty.⁷

However, most studies on Ming Buddhism have focused on the later period, because it is widely accepted that the middle of the 16th century witnessed a revival of Buddhism in late Ming period. Other important works have studied famous individual monks.⁸ Contrary to the existing studies on the later period of Ming rule and on famous individual monks, our contribution wants to highlight the historical roots of imperial regulation of religious communities—roots that we trace back to the early Ming Dynasty. There were three main policy developments in the early Ming period. These were Emperor Zhu Yuanzhang’s works on *The Three Teachings, Interpretation of Buddhism* (late 14th century), and the following statements on the relationship between the religious communities and the royal authority. As we shall see more in detail in the following sections of this article, these statements made by the Emperor, recorded by the royal officers in the palace, played an important role as written law. Therefore, our contribution aims to offer an alternative point of view to comprehend the uniqueness of Chinese religious policies, which has been lasting for centuries and is even clearly observable today. Furthermore, this work aims to review the regulation of religious communities in the late medieval period from a comparative angle between Ming China and pre-Reformation England (focusing specifically on the Benedictines). We hope that this will stimulate further comparative research concentrating on institutions, policies, regulation, and/or suppression of religious communities in Eurasia.

2. State-Oriented Regulation of Religious Communities

Traditionally, membership in Buddhist and Christian monasteries implied renunciation of the world, but that did not impede various contacts with the outside world. Few would disagree that

³ (Lutter 2016, p. 373).

⁴ (Baskerville 1937; Clark 2002, pp. 3–13; Thompson 1937, pp. 165–95).

⁵ For a comprehensive treatment of Buddhism in whole Ming Dynasty, see (Yü 1998, pp. 893–952).

⁶ (Brook 1993, 2005, pp. 133–34, 137–38; Brook 1997, pp. 161–81).

⁷ (He 2004a; Ren 2008; Zhao 2008a).

⁸ For early representative works, see (Hsu 1979; Yü 1981). See also the works cited in (Eichman 2013). New works concentrate on the Jiaying-Wanli (1522–1620) period, see (Eichman 2016; Zhang 2020).

monasticism was at the heart of medieval culture, society, and even economy in the early and high middle ages, and this was possible precisely because monastic communities engaged with and contributed to shape the world around them.⁹ In Western Europe, the Investiture Controversy, in the 11th to 13th centuries, marks one of the most dramatic periods. From the late 12th century, the “golden age” of monasticism was over, given the fact that the later Middle Ages saw few novel monastic foundations and no major reform movement, at least in England. This was partly due to increasing impediment from the Crown and local aristocracy.

Pope John XXII (r. 1316–1334) once remarked that no other country displayed so many intrusions of secular authority into ecclesiastical affairs as England.¹⁰ However, as we shall see, the religious communities in England still enjoyed impressive freedoms in religious education, economic activities, and of course in their own liturgy. Therefore, James Clark suggested that the late medieval modifications of monastic life criticized by David Knowles might be better understood as a “bold attempt at modernization” rather than evidence of decline.¹¹ Contemporaries complained that the religious life practiced in monasteries was not characterized by particular austerity or zeal. This phenomenon was also witnessed in China and could be well illustrated by a pamphlet titled “*Lament over Ancient Time*” (*Kai Gu Lu*) composed by Zhanran Yuancheng (1561–1626):

“We are too far from the ancient time [the imagined golden period of Buddhism], all monastic rules and observances are completely brushed aside. The sun of Buddha is going down, sangha (monks) is almost vanished. I am worried *Sanwu Miefu* (Three emperors ruining Buddhism) will occur today. How could I not lament?”¹²

Interestingly, Yuancheng was not only lamenting the wrongdoings of the monks, but also complaining that the situation was mainly due to the inaction of the government, which did not regulate the religious communities effectively. In the pamphlet, he argues that the chaotic situation within the monastic communities should partly be blamed on the communities’ internal conflicts, but the government should take the major responsibility. The key issue here is that Yuancheng believes that the secular rulers have the right and duty to select heads of Buddhist monastic communities and the secular governors share the duty of supervising the operation of sangha. It is understandable that Yuancheng’s final solution to the decline of monastic discipline is to expect the secular government’s direct and stricter surveillance. Among the crucial government actions that needed to be revived or intensified, he listed confirming the official regulation, choosing the heads properly, systematizing the examinations, and regulating the wandering monks.¹³ It is quite clear that the monk takes the regulation of Buddhism by the government for granted and anchors his hope on that for the revival of the monastic life. Therefore, we can see that the most evident feature of Ming Buddhism is an extremely close connection between religious communities and the government.

The system of The Monk Official is the most unique institution in China. This had existed since the Later Chen Dynasty (384–417), before the final collapse of the Western Roman Empire. The Tang and Song Dynasties (early 7th century–late 13th century) witnessed great development and transformation of Buddhism, and indeed during this “golden age” the Sangha was under the direction of the *Central Buddhist Registry* (*Seng Lu Si*). In the Yuan Dynasty (1271–1368), the office became known as the *Commission for Buddhist and Tibetan Affairs* (*Xuan Zheng Yuan*). The Monk Official, often a monk but at times a secular person (and even somebody who did not practice Buddhism), was traditionally chosen by the emperor to oversee and regulate the Buddhist communities all over the country according to the general instructions and policies issued by the central government.¹⁴

⁹ See for instance, (Adolphson and Ramseyer 2009; Crabtree 2010).

¹⁰ (Layfield 2012, pp. 157–71).

¹¹ (Knowles 1961). This idea is fully demonstrated in (Clark 2004).

¹² (Yuancheng 1983, p. 724).

¹³ (Yuancheng 1983, p. 726).

¹⁴ For the detailed explanation of the function of the monk officials in the Ming dynasty, see (Ma 2014).

Similarly, secular control over religious matters and practices is not alien to the history of the Catholic Church. At the time of the Roman Empire, the emperor called and acted as a judge at the ecumenical councils. Moreover, we know that Constantine and his son tried to regulate the Church, and some of their legislation to this effect had implications even for the liturgical life of the Christian community.¹⁵ From Charlemagne onwards, the Emperors behaved as the protectors, guardians, and leaders of Christendom as a whole. The secular rulers led reformations among religious communities and even grasped the practical power to make and unmake the bishops and even the popes, especially as a consequence of the Ottonian system of governance and of the 10th-century crisis of the papacy.¹⁶

However, the Ming Dynasty had a systematic structure of directing, guiding, and supervising Buddhism, inherited from previous dynasties. The government policy concerning the Buddhist communities was primarily civil and administrative in nature. This is something fundamentally different from the nature of ecclesiastical governance and monastic regulation in Europe before the Reformation.

Firstly, the main task of the Monk Official system in China was to ensure the absolute obedience of monks to the imperial government. Compared with other regions of the world, China's imperial government had successfully monopolized the power to manage religious communities. This not only included the management of monks as subjects, but also the management of the internal discipline and formation, as well as codes of conduct for the entire community both within and without the walls of the monastery.

Since its reorganization in the early Ming Dynasty, Buddhism further lost its institutional independence due to state intervention. By incorporating the management of Sangha into the daily operation of the bureaucratic system, the state was able to embed Sangha deeper into the existing political system. The Ming Dynasty set up a Buddhist Registry under the Ministry of Rites (1382), but they also demoted the officials dealing with this registry in the scale of grades representing the powers of different imperial bureaucrats.¹⁷ Still, the powers enjoyed by these officials are multifaceted and far-reaching, including recommendation, examination, and appointment of monks and abbots in large temples, issuance of the official certificates for monks and nuns, inspection of monks' observance of discipline and monastic rules, registration and collection of the registries of religious people, and publication of Buddhist books.¹⁸ Therefore, the Monk Official system became a hierarchical and bureaucratic construct. The majority of officials were monks, but their identity of state officials was more important to them than being a monk. This means that their responsibility to the imperial government was greater than that to the religious communities.

Under such bureaucratic system, we can see the distress of monks caused by redundant officials. For example, in the late years of the Yuan dynasty, a monk in Beijing complained that the main suffering of the monks is that "there are too many officials who regulate us, as there are only ten sheep but nine shepherds".¹⁹ This was expressed in the 1360s. In imperial China, state power was absolutely pervasive across the society, its economy, institutions, and religious life. Although the emperors in the early Ming Dynasty often supported Buddhism as individuals, they were determined to control Buddhist communities and practices as rulers. All the policies were formulated based on the interests of imperial authority rather than on the personal religious commitments of individual emperors. As *The History of Yuan Dynasty*, the official history of the Yuan Dynasty compiled in the early Ming

¹⁵ (Eusebius 1955, pp. 380–84). For an introduction on the very consequential tensions characterizing the relationship between Constantine and the early Church, see (Drake 2007, pp. 111–136).

¹⁶ (de Jong 2005, pp. 103–35; Young 2019).

¹⁷ (Ma 2014, pp. 56–61).

¹⁸ (Ma 2014, pp. 22–26).

¹⁹ (Xing 2018, vol. 1, p. 1).

Dynasty, records: “The religions of Buddhism and Taoism have been present across China for thousands and hundreds of years, but their fortunes have always been tied to the likes and dislikes of emperors.”²⁰

Moreover, while the observance of religious requirements in Chinese Buddhism was originally shaped and stimulated by the faith and conscience of the believers, it became the passive implementation of guidance from the imperial government from the Tang Dynasty (618–907). As suggested by Tang Yongtong, as Buddhists viewed emperors as their ultimate lords in spiritual and material issues, they would naturally be subject to the jurisdiction of the state.²¹ The emperors founded temples, donated lands, and bestowed money to the sangha. In return, the monks had to pray for the rulers and for the empire. Though this seems to parallel, in many ways, the functions of Frankish imperial monasteries in the 9th to 10th centuries, the core difference is that the Buddhist communities in China did not have an additional and translocal support—such as the one offered by the Pope—but relied exclusively on the secular rulers. As a consequence, in Ming China, the secular authority had the power to deprive monks of their religious identity, and the task of restraining monks’ behavior shifted from inside to outside of religion. Therefore, Buddhist religious life in Yuan and early Ming China was essentially organized not by religious rules and leaders but by the law issued by the secular authority and by the officers representing and enforcing it.

The situation in England is at the same time similar and different. On the one hand, the monasteries took advantage of the power of the Crown when their rights were under threat in disputes with local nobles or towns. On the other hand, the very existence of a translocal and independent authority such as the Papacy in Rome meant that the liturgical life of monastic communities was mostly beyond the boundaries of royal jurisdiction, and even matters that were more administrative or political in nature could not be arbitrarily settled by the Crown without considering the authority of the Church. This reveals the most significant difference between China and England. After the emergence of a Cluniac model of institutional hierarchy independent of local political powers, and even more so after the Gregorian Reform and Investiture Controversy, Latin Christendom had a Church that was a highly organized, transnational, and jurisdictionally independent religious community unlike other Christian churches and other religious communities in other parts of Eurasia. Crucially, the two main organizational features of this reformed Church were the papacy and religious orders approved and protected by it.²² The difference here also reflects the fundamental divergence of the pedestal of ruling. In imperial China, the legitimacy of the emperor’s orders was based on the idea of the Mandate of Heaven, and the special relations between the emperor as a sort of *pontifex maximus* and Heaven rendered impossible the emergence of a parallel authority in the spiritual sphere.²³

In the case of England in particular, late medieval relations between the Crown and the Papacy were unavoidably influenced by the recent past. It is somewhat paradoxical that a kingdom where the reverberations of the Investiture Controversy had been so significant, where Anselm of Canterbury had faced so much opposition, and where Thomas Becket had been murdered, should see from the reign of John (1199–1216), and more precisely from 1213, a political experiment that could be termed papal feudal overlordship, or papal fiefdom.²⁴ As splendidly reconstructed by Jane E. Sayers, even though the papal protection was due to contingent circumstances and to the political weakness of John, the English monarchy did benefit from it for a while and the payment of the tribute continued (intermittently) for about 120 years.²⁵ While the papal fiefdom over England was not directly related to

²⁰ “Commentary on Buddhism & Taoism”, in *History of Yuan Dynasty*, vol. 202.

²¹ (Tang 1982, p. 56).

²² The “religious order” here means an *ordnung*, such as a universal rites for celebration of religious rites and sacramental system, rather than the religious communities supervised by a head and under the specific rule, such as Dominicans or Franciscans.

²³ (Zürcher 2013, p. 96). Only in contemporary Thailand can we find a pattern of a Buddhist king and a sangha gives him legitimacy through the system, which reminds the Asokan model of kingship.

²⁴ (Turner 2009, p. 133).

²⁵ (Sayers 1984, pp. 162–92).

the governance of monastic houses in the kingdom, and a detailed history of this political arrangement is beyond the scope of this article, it is reasonable to suggest that the prestige of the papacy in England was greatly enhanced by this episode, thereby indirectly strengthening the independence of monastic jurisdictions and confirming the profound difference in the relations between secular and religious spheres in England and China.²⁶

Secondly, the basic outlines of the Ming policy toward Buddhism were established by Zhu Yuanzhang (r. 1368–1398), the founder of the Ming dynasty, who had a very clear plan to preserve the ideological foundations of the emperor's ultimate authority on religious matters. He initiated a series of institutional reforms to reorganize Buddhist establishments, and embodied a new, close relationship between government and Buddhist communities.²⁷ Before his rebellion, Zhu Yuanzhang became a novice at the age of 17 and spent eight years as a monk at Huangjue Temple (1344–1352), where the head had a wife and children. This was quite typical in rural temples at that time, and this first-hand experience of monastic life had much to do with Zhu Yuanzhang's policy of instituting new measures and reintroducing old statutes to regulate Buddhism.²⁸

Zhu Yuanzhang's claim that the state should manage the monks and establish the specific office under the imperial court's direction is elucidated very clearly in one of his letters to the highest Monk Official in the 1380s:

"The Monk stands on the earthly world to enlighten the people, and he should not be bothered by the officials in the beginning. However, they [monks] live together and eat together, there is a cashier to run the money and grain, and they need to register or unregister in the books of the people. If there is no government, how could it be regulated perfectly? Therefore, the establishment of the Monk-Official has lasted for many dynasties."²⁹

Zhu Yuanzhang did not articulate this view as an ad hoc solution for the issue of monastic communities. Rather, the idea that the state should intervene in the life of monasteries fits in harmoniously with a broader ideological framework, which sees the entire Chinese society and people from all walks of life as in need of government regulation. On the other hand, even though secular intervention in Europe could be found throughout the Middle Ages, churchmen in Latin Christendom could boast about their service to the secular rulers, as they autonomously developed principles of good government based on the pursuit of an ideal Christian society. From at least the Carolingian period, they seem to have been successful in their service and there is sufficient evidence to claim that their influence on the policies of various rulers was significant.³⁰ More importantly, the Church progressively spelled out its own liberties and took charge of much of its own daily administration—even more so from the 11th century, after the emergence and refinement of a coherent body of Canon law.³¹ In England, this process continued well after the episode of the papal fiefdom over the kingdom remembered above, as confirmed by the 14th-century reorganization of self-governing Chapters, with the southern and northern Chapters merged into a single national English Chapter following pope Benedict XII's decision in 1336.³²

Arguably, an opposite trajectory is observable in China since Zhu Yuanzhang. He followed precedents in some areas, such as the institution of monk officials, but, crucially, he also instituted

²⁶ Perhaps it is not by chance that Innocent III's 12 decretal *In singulis regnis*—which gathered what up to that point had been completely autonomous monasteries into broader self-governing Chapters gathering different monastic houses—had a much greater impact in England and Wales than in any other area of Christendom. (Clark 2011, pp. 7, 290).

²⁷ (Taylor 1983).

²⁸ (Brook 2005, pp. 159–62).

²⁹ (Zhu 2007, p. 2).

³⁰ (Kramer 2016b, pp. 338–61).

³¹ Not only did Canon Law prohibit secular interference, but it was also used at times to establish the boundaries of secular intervention when the Church needed it to restore order in some monastic communities. (Logan 2002; Forrest 2015, pp. 17–34; Musson 2019, pp. 54–65).

³² (Pantin 1933, vol. 2, pp. 230–32).

new policies in others, such as the classification of monks and monasteries. In the practice of imperial governance through the Monk-Official system, one of the most important tools was the division of Buddhist communities into new groups. During the Song and Yuan dynasties, monasteries were divided into three categories: Meditation (*Zen, Chan*), scriptural study (*Speaking, Jiang*), and discipline (severe observance, *Lü*). In 1370, Emperor Zhu Yuanzhang kept the first two categories and replaced the last category with a new one called “ritual Buddhism” (*Teaching, Jiao*), which during the Ming Dynasty was called yoga (*Yujia*) more frequently.³³

The respective functions of each group were defined in a 1382 regulation issued by the Ministry of Rites. Along with religious rituals and court ceremonial, the Ministry of Rites also oversaw the imperial examination and foreign relations. In this regulation, Zen monks were described as those who “do not establish words” but aim at seeing their own nature. The studying monks concentrated on understanding scripture. The teaching (yoga) monks taught the people by performing Buddhist rituals, which destroy all kinds of present karma created by deeds and thoughts and cleansed away the evil influences accumulated by the past karma of the dead.³⁴ Special attention was paid to yoga monks, due to the fact that those monks were dedicated to various ritual activities, and they were the monks most closely in contact with the secular society outside the monasteries. Therefore, this seems a good example of how Zhu Yuanzhang’s vision as expressed in the abovementioned letter translated in practice into an expansion of government regulations concerning the monastic life.

3. The Regulation of Monks as a Group: Examination, Certificate, and Limitation

The major institutional difference between late medieval English Catholic monks or clergy and Ming China Buddhist monks lays in the formation and ordination processes. In medieval England, monasteries were run independently by the Church, while in Ming China, everything, including ordinations, had to be approved and controlled by the government.

“Ordination” is a word with much European and Christian historical and theological meanings. With regard to the Buddhist monks in China, ordination does not mean that a candidate was accepted, or his formation certified and approved by a Buddhist religious authority or community. Quite the opposite, in the Chinese context, ordination means the moment in which a candidate is officially recognized by the secular government as a religious person. Crucially, in Ming China, the ordination process symbolizes the relationship between the monk and the imperial government through the agency of a Monk-Official and the whole state bureaucracy, while in Europe, it is a sacramental action embodying the connection between the clergy and the Church as a spiritual community and as a corporate body independent of (and disentangled from) the state apparatus.

The first important prerequisite for ordination (tonsure, *Tidu*) in Ming China was to pass the examination, and because since the Tang Dynasty there had been a state-run examination system for monks, it is possible to say that ordination represented a crucial tool for the secular control of monks for centuries.³⁵ The main subjects covered included basic understandings of Buddhism’s essential scriptures and ritual practices carried out in Chinese Buddhism, but it is noteworthy that the curriculum and criterion for the examination were prescribed by the imperial government. In the Ming Dynasty, such examinations became more formal and stricter. On the 16th year of Hongwu (1383), an order from the emperor was sent to the Buddhist Registry:

“With regard to the yoga, tantric or common rituals, all must be tested in a stable manner. A certain standard should be established and promoted for all temples across the country, so that people will always abide by it [. . .] Every yoga monk who comes to the capital to

³³ (Yü 1998, pp. 906–11).

³⁴ “Entry of the 15th Year of Hongwu”, in Ge Yinliang, *Jin Ling Fan Cha Zhi*, vol. 2, p. 53.

³⁵ (Ch’en 1964, pp. 213–26).

take the exam, must be tested according to the rules now established. Only those who pass the exam can become monks."³⁶

This is reconfirmed in the early 15th century, when a contemporary monk testified that:

"To become a monk in the meditation or exposition, one must pass a test on three scriptures [. . .] To become a monk in the teaching [yoga category], one must pass a test on the rules and liturgies concerning the feeding and deliverance of *hungry ghosts with flaming mouths* (饿鬼施食仪). One can become a monk only if one can pass one of these two tests. This is in accordance with the national constitution."³⁷

This shows the pervasive nature of the imperial government in China and the necessity for the local bureaucracy to control the local religious communities. More importantly, for Buddhism in China, the distinction between "officially approved" and "heterodox" religious beliefs and practices was completely in the hands of the imperial officers rather than something determined by authoritative monks or by the sangha as an institutionally independent "congregation". The issuing of a certificate of ordination (dudie, 度牒) was not something done by a religious authority but by a civil one, so much so that the certificate issued by the imperial government constituted the only effective and legal evidence of ordination.³⁸ Therefore, the Dudie system has come to symbolize the government's control of Buddhist groups.

When we look specifically at the process of education and ordination of new monks in late medieval England, we find a very different situation than the one just described above for early Ming China. As discussed by James Clarke, "the making of a Benedictine"—that is, the process of selection, observation, education, and examination of a candidate who wished to join a monastic community—was very strict in medieval Europe.³⁹ Yet, the similarities with the exams and certifications taking place for Buddhist monks in Ming China end there. In Latin Christendom, the monasteries were completely autonomous in their development and enforcement of standards and procedures for the selection and formation of candidates, and secular governments (even those extemporaneously stimulating or favoring certain reform movements) had nothing to do with the education of monks. Candidates were tested with regard to both their character and their knowledge. Abbots used the *Rule* of St. Benedict as a framework to systematically assess the will of postulants and, later, the knowledge of those admitted to the novitiate. This period was dotted by examinations based on the *Rule*, which were taken within the monastery and under the supervision of a senior monk. In late medieval England, this period of supervision was progressively lengthened, so that by the 15th century a Benedictine could have completed the process of formation and even become a priest or earned a university degree but still be under the mentorship of a supervisor, sometimes, as in the case of Westminster Abbey, known as "tutor."⁴⁰ In addition, all the novices were under the authority of a novice master, a figure that had once again been legislated into being by the *Rule*, not by a secular authority.

This basic framework, integrated by the Carolingian model of monastic education, which included grammar and the *artes liberales*, was obviously subject to change, especially with regard to the contents of the novices' education.⁴¹ Recent research by Katie Ann-Marie Bugyis has shown that English Benedictine nuns continued to receive pastoral and liturgical education, as they continued well into the Central Middle Ages to perform ministries and produce liturgical texts.⁴² Moreover, a novice

³⁶ Entry of "the 16th Year of Hongwu", in Ge Yinliang, *Jin Ling Fan Cha Zhi*, vol. 2, p. 54.

³⁷ Quoted from (Hsu 1979, p. 142).

³⁸ Entry of "Summer April of the 15th Year of Hong Wu (1382)", in *Ming Tai Zu Shi Lu (Veritable Records of Taizu)*, vol. 144, Taipei: Institute of History and Philology, Academia Sinica, pp. 2262–63.

³⁹ (Clark 2011, pp. 74–90).

⁴⁰ (Harvey 1937, pp. 51–74, especially pp. 56–57).

⁴¹ Diversity and flexibility in the curriculum were evident from an early period, and at times female monks taught male novices. (Ranft 2002, p. 10).

⁴² (Bugyis 2019).

could become a monk only by “absorb[ing] the culture of the community in which they were to make their profession,”⁴³ and as a consequence each region and even each monastic house developed unique additions to their curriculum, which included local histories, traditions, and hagiographies.⁴⁴ Considering the comparative aims of this article, what seems most relevant is the fact that the entire process, from postulancy to profession and to continuous, post-profession formation was self-regulated by the *patria monachorum* and in no way under the authority of secular rulers or their officials. Furthermore, evidently, something like a state certificate was completely inconceivable in the context of religious communities where the abbot or abbess was “the ultimate administrative and disciplinary authority for the house and its members.”⁴⁵ If we look at other religious institutions like the parish, we find the same institutional culture. In Latin Christendom, each parish had its own territorial jurisdiction for all matters concerning the liturgical and religious life, including the recognition of a preacher and the celebration of sacraments. For ordinary clergy, offering sacraments in different areas required the approval of the parish priest or even the local bishop.⁴⁶ In this context, while secular lords and monarchs often discussed and sometimes led Church reforms in their territories,⁴⁷ the independence and self-government of monastic communities after the Cluniac movement seems clear and was part of a broader institutional culture.⁴⁸

In Ming China, the local bureaucratic offices carried out functions comparable to those of bishopric administration. In the 26th year of Hongwu’s reign (1393), a specific regulation recorded in the *Jurisdiction of the Ministry of Rites* shows that the local government should have taken the responsibility of checking the statutes of monks and reporting their application to the Ministry every three years. On the one hand, *Dudie* embodies the government’s censor power, indicating that the government has the power to appoint or reject individual requests for monastic life; on the other hand, it is also a qualification recognition, that is, to endorse that the person has corresponding Buddhist knowledge and mastery of performing Ritual based on the government’s authority.⁴⁹ Furthermore, another very important motivation for the government is to control the spread of heresy in order to prevent possible incidents of religious rebellion.⁵⁰

It is important to stress that in Ming China, government control over religious communities was not just an idea expressed in official regulations but also something enforced on the ground. Even though during this period there were cases of private ordinations and of monks who did not have a state certificate, these individuals remained in an illegal status, and whenever their number grew or the emperor launched investigations, they were harshly punished. Here we will briefly discuss three remarkable examples of the impact of imperial legislation on the fate of privately ordained monks. In the 25th year of Hongwu (1392), the government discovered thousands of “fake monks,” and the emperor immediately ordered that they should be used as troops. That this order was being carried out is confirmed by the fact that, in order to save these illegally ordained monks, a famous monk named Yonglong decided to apologize by self-immolation.⁵¹ On the fifth year of Yongle (1407), privately ordained monks were banished to the barren, cold, and remote areas of Liaodong and Gansu. Additionally, the next year, the emperor ordered again that the monks who had been ordained privately,

⁴³ (Clark 2011, p. 82).

⁴⁴ For an early case study of this development, see (Golinelli 2006, pp. 17–38). For a discussion of an English example of distinguishably local monastic intellectual traditions, see Nicholas Heale’s dissertation (Heale 1994).

⁴⁵ (Clark 2011, p. 113).

⁴⁶ (Heath 1969, pp. 12–17). For more general reflections on the self-governance of parishes in medieval Europe, see (Reynolds 1997, pp. 79–100).

⁴⁷ In England, the best example of this early royal participation (or even leadership) in monastic reform is arguably *Regularis Concordia* (973). For an interesting discussion and contextualization of this document, see (Harper 2019, chp. 2). See also (Howe 2016).

⁴⁸ For an introduction to Cluniac monasticism, see (Hunt 1971); for important reflections on the model of corporate, independent organization offered by Cluny and its reform movement, see (Berman 1983, pp. 88–92).

⁴⁹ (Zhao 2008a).

⁵⁰ (Lei 2000, p. 121).

⁵¹ (Shi 1991, vol. 20).

along with their fathers and brothers, be arrested and sent to the outskirts of Beijing to farm and raise horses. Moreover, the abbot who had hosted these monks was also condemned to forced labor.⁵² In 1433, the Xuande Emperor launched an investigation across the country to search for privately shaved (ordained) monks and to send them back to their native place, where they were punished severely in accordance with the law.⁵³

Another issue that we have to examine is the appointment of abbots. In China, appointment, assessment, and abdication of abbots have been incorporated into the monk official management system since the Ming Dynasty. Contrary to the situation in Christendom, in China, there were no Pope-like characters or similar offices. In addition, though there is a genealogy inherited from Buddhist ancestral Chamber, the fame of certain monks did not depend on their knowledge or holiness but rather on the temples to which they belonged. The heads of the temples that had received royal honors were often regarded as leading figures in the Chinese Buddhist world. Most of these monastic leaders lived in the temples of the capital of the empire.⁵⁴ However, this does not mean that the election of such figures was left to chance, nor to internal and autonomous mechanism within the religious communities. Instead, contemporary documents confirm that in the two capitals of the Ming dynasty, namely Beijing and Nanjing, “if there is a vacancy for the position of abbot, the officers of the Ministry should test the monks and fill the gap with those who performed best”.⁵⁵ Therefore, the management of the sangha and the selection and appointment of the most important monastic heads were directly under the control of the government.

The whole selection process for Buddhist abbots closely resembled the selection process of secular officials. In other words, by the 13th century, in China, the criteria for selecting officials and monks had become one. Even the selection process was no different from the imperial examination system, the only difference being that Buddhist scriptures replaced Confucian ones.⁵⁶ This is fundamentally different from the widely received opinion on the investiture of a bishop or an abbot among the religious people in the 13th to 14th centuries in Europe. For example, in the late Middle Ages, English religious communities preferred to reach an agreement concerning the election of priors, and the direct influence on the appointment of prelate would be considered as “startlingly uncanonical settlement”. A chronicle of a community would boast of their independence from secular control and record that their head was “installed peacefully, without any secular presence as head of the house”.⁵⁷

Thirdly, limiting the number of monks is also one of the important manifestations of state control of religious communities. The basic spirit of the Dudie system established in the Hongwu period was to restrict the population of monks, to separate monks from the lay people, and to grant the certificate after examinations. In the beginning of Ming Dynasty, the dramatically increasing number of monks and nuns posed a troublesome problem. Because Zhu Yuanzhang abolished the traditional tax on religions called *corvee labor* exemption money, there was a great increase in ordinations.⁵⁸ The increase in the number of monks worried the secular ruler, including the emperor and some other ministers at the imperial court and local government. From the perspective of the factions campaigning against

⁵² *Ming Tai Zu Shi Lu*, vol. 63, 80, pp. 887, 1026.

⁵³ *Ming Xuan Zong Shi Lu*, vol. 100, p. 2430.

⁵⁴ In the Ming Dynasty, temples were often not the place for the promotion of learning. Therefore, the image of “enclaves of learning” is useful when applied to European, Islamic and Tibetan or even Theravada Buddhism, but not very persuasive for inner China during the Ming Dynasty. See (Kramer 2016a, pp. 273–88).

⁵⁵ (Shen 1997, p. 27).

⁵⁶ (Xie and Bai 1990, p. 194). From 1451, the certificates became a commodity again in the name of disaster relief in Sichuan and Guizhou. This is the beginning of the abolishment of the strict examination system that had been invented from the beginning of the Ming Dynasty. See (Zhao 2008b, pp. 77–79).

⁵⁷ *Chronica Monasterii Sancti Albani: Gesta Abbatum Mon. S. Alb.*, ed. H. T. Riley, 3 vols, RS, xxviii(iv) (1867–1869), vol. 1, p. 206; vol. 2, pp. 87–88. On this early 13th century example, see (Heale 2004, pp. 70–71).

⁵⁸ (Yü 1998, p. 894).

Buddhism, the monks and nuns who did not raise children and did not participate in economic activities or work were useless to the country.

In addition to the certificate and examination, the government also tried to prescribe quotas and age limits for religious communities. According to the government plan, there were to be no more than 20 monks per county, 30 per district, and 40 per prefecture. More importantly, the frequency of ordination ceremonies was reduced from once every three years to once every five years. In the early 15th century, it was held every 10 years. In addition, in 1487, it became once every 20 years.⁵⁹

The number of monks in the Ming Dynasty as a whole was not large compared to the previous dynasties, and it was estimated to be about 1/118 of the entire population.⁶⁰ At the same time, there were strict restrictions on the number and size of Buddhist temples in Ming China. All the monks must live in designated temples, and the temples with less than 30 monks should merge with other temples. Even the numbers of temples and monks in each town and county were strictly regulated. According to the most important document on these issues, the *“Records of the Buddhist Temples in Jinling”*, published in 1607, there were 180 temples in Nanjing, and more than 100 small temples without records. Among them, 95 temples owned some public field, with a total land of 72,029 mu (around 11,866 acres). The eight temples conferred the royal title by the emperor occupied 66,270 mu (around 10,917 acres), which is 92% of the total land. The average temple had only 18 mu (2.97 acres) of land on average. This indeed could not feed the ration of the designated number of monks per temple (30).⁶¹ This situation was caused by the dependence of all monasteries from the central government, and to make matters worse, many monks also sold the public land privately, while some people took the opportunity to embezzle temple land.

Once again, the religious landscape in late medieval China appears as quite different from that of Europe at roughly same time. For example, Martin Heale has demonstrated that that the numerous dependent priories in Medieval England were established by the mother house alone, with little or no part played by a secular benefactor.⁶² For example, Marsh abbey was founded by Humberston in 1360, Ovingham by Hexham in 1378, and Molycourt and Spinney were absorbed and saved by Ely in 1449.⁶³ This practice would be unimaginable in Ming China, and the majority of the foundations of Buddhist temples should be approved by the Emperor.

4. Regulation on Individual Monks: Separation from Secular Society

Religious norms and moral restrictions are not only the bond for cohesion within the monastic community, but also form the dividing line between it and other social groups. The supervision over the religious communities dealt with their inner organization as well as with their public display. In early Ming China, regulations on dress and appearance stemmed from a complex array of intentions and anxieties relating to religious identity, economic status, and sexuality. The regulations on monks' dresses provide a very good perspective for us to understand the control of Buddhists, as individuals and communities, by the Ming Dynasty and its ministers and officials. In the first place, the cassock (*Jia Sha*), robe, and certificate of a monk constituted his full identification. The government issued strict restrictions in 1381 on the color of monks from respective factions, and monks in the Han region were not allowed to wear Tibetan monks' uniforms. Especially during the Yuan Dynasty, the Tibetan Lama's social status was higher than that of the monks belonging to Chinese Buddhism. This was due to the fact that the majority of the Lamas were ranked at the second level, and the Han monks were mostly the third and fourth class. Therefore, the restrictions on the monk's robe were also

⁵⁹ (Yü 1998, p. 895).

⁶⁰ (He 2004b) “Compared with the previous generation, the absolute number of monks in the Ming Dynasty is not very large ... Even if the maximum number of 300,000 monks is calculated, it only accounts for 0.47% of the total population.”

⁶¹ “Regulation of Public Property in Various Monasteries”, Ge Yinliang, *Jin Ling Fan Cha Zhi*, vol. 53, pp. 842–44.

⁶² (Heale 2004, p. 56).

⁶³ For a full list of the Foundation of English cells, see (Heale 2004, pp. 289–313).

restrictions on social identity.⁶⁴ Secondly, during the Ming Dynasty, there were restrictions on the materials of monks' robes. The monks were not allowed to use high-grade materials such as satin, silk, and brocades. The violators were to be defrocked and their clothes confiscated. The interpretation of this provision is that only people with official positions can wear silk or satin. Monks were described as "ragtag" (*Xia Liu*), so they were not allowed to wear them.⁶⁵ Thirdly, monks were barred from wearing ritual robes for the trials. If the monk had committed a crime, he must first take off his robes before entering the court, otherwise, "If anyone dares to kneel down while wearing a robe during the trial, he will be punished to death".⁶⁶ Finally, the law in Ming China stipulated that if a monk is found guilty of a crime, he should be defrocked and then accept the punishment as a lay member of society. Therefore, all the temples and their possessions could be confiscated.⁶⁷

Another requirement for monks was to limit their movements. Government regulations to this effect were based on Zhu Yuanzhang's attempt to separate Buddhism from society. In 1394, his new decree stipulated that monks could not travel freely nor associate with government officials and ordinary people. Already during the Tang Dynasty, monks could not stay in private houses for more than three nights, and each trip must not exceed seven days, otherwise a case review must be conducted. The Song Dynasty emphasized that all monasteries should feed their monks, "for the monks are settled down in Zen, Jiao and Lü temples, and dare not to travel alone".⁶⁸ Such restrictions of movement have gradually amounted to religious suppression in Chinese history.

In the Ming period, this kind of control over monks' travel was even stricter. The main control method was to compile rosters of all ordained monks (*Zhouzhi Wence*) in 1392, containing the names of the monks, registration of households and the dates as well as places of their ordinations, and, most importantly, the identification numbers of the monks' certificates. These rosters could be very effective to regulate the number of monks across the nation and restrict the wandering monks. Monks arriving from a different area of the empire must be reported to the local government, and those who hide must be punished.⁶⁹ Until the 45th year of Jiajing (1566), no wandering monks were allowed according to the regulation.⁷⁰ This general policy of isolation contributed to the decline of Buddhism in the late medieval period. After the mid-16th century, once the regulations on Buddhism (or, better, their actual enforcement) were relaxed, the gentry and the literati were once again interested in Buddhism, and the Buddhist revival could begin.⁷¹

Similar injunctions on wandering monks or canons are also observable in late medieval England.⁷² However, in England regulation against religious dwelling alone outside their monasteries was an act by the Church, based on ecclesiastical authority rather than secular rules, and the same can be said with regard to the regulations concerning dress, with the only possible exception of sumptuary laws for senior clerics. In a sense, this self-regulation was part of a general trend by the Church and medieval society at large that regulated the movement of people from every profession and class.⁷³ In addition, monastic communities in the late Middle Ages were more willing to engage with intellectual and devotional trends emerging in society, and monasteries were overall outward-looking institutions. They provided a range of valuable services, including not only prayers and Masses, but also hospitality

⁶⁴ *Ming Tai Zu Shi Lu*, vol. 150, p. 2368.

⁶⁵ (Ying 2013, p. 189).

⁶⁶ Ge Yinliang, *Jin Ling Fan Cha Zhi*, p. 57.

⁶⁷ (Ying 2013, p. 24).

⁶⁸ (Ma 2014, pp. 106–8).

⁶⁹ (Yu 1981, vol. 5, p. 88).

⁷⁰ (Yu 1981, vol. 17, p. 323).

⁷¹ (Jiang 2008, p. 278).

⁷² (Powicke and Cheney 1964, part. 1, pp. 92–93, 464; part. II, p. 786).

⁷³ A clear example of this is visible in the various kinds of permissions that every pilgrim had to obtain before leaving his or her community. (Davies and Davies 1982, pp. 73–96).

and charity, education, and even transport.⁷⁴ This is something quite different from the kind of Buddhism shaped by Ming regulations in China.

Thirdly, while in China the heads of Buddhist temples never served on government commissions as tax collectors or supervising public works, the connection between Catholic monks and the political elites in England had many expressions. Nobles were predominant among the leadership of monastic houses,⁷⁵ and in the early Middle Ages they accounted for a significant share of the overall monastic population.⁷⁶ Even though in England this situation changed in the late Middle Ages, the large monasteries in the country were still major landholders and important for local administration, so they continued to have a close relation with the Crown. In the decades leading up to the Dissolution, the involvement of the Crown in monastic affairs became increasingly pressing. However, crucially, this pressure resulted in the greater public role required from superiors rather than in a diminution of the power of the heads of monastic communities.⁷⁷

Fourthly, the possession of land is crucial for both Western and Eastern monks. However, while during the Tang dynasty many Buddhist temples engaged in various forms of economic enterprises, in the Ming period, this became quite rare. Moreover, the monks' privileges of exemption from taxes were also often denied. For example, during Zhengtong reign (1436–1449), the Mituo Temple in Wanping County (Peking) possessed 18 hectares of land. The monks here appealed to the emperor to grant them the privilege of exemption from taxation, arguing that "we are quiet and deserted disciples". However, the emperor's answer to this was: "If the monks cannot pay the taxes, the land should be confiscated." The few temples that could obtain the exemption from paying money must have the privilege stated in an imperial letter and with a stone seal as evidence.⁷⁸

Moreover, in China, the fundamental rule is that all monastic property cannot be traded. On the 15th year of Hongwu (1382), a bill established that all the land granted to the monastery cannot be traded, and all the property of offenders would be confiscated. Four years later, the emperor issued a regulation, highlighting that no monk should be forced to perform *corvee labor*. In 1394, he confirmed again that all the land given by the royal family to the monastic community should be exempt from *corvee labor*, which means the labor hired by the monastic communities also shared the same privilege. At first, this could be viewed as a privilege for the monks.⁷⁹ However, as we suggested above, in practice, the local government often denied that they were legal monks and forced them to accept to pay by labor or money. To be sure, in order to relieve those temples lacking in real estate, monks could flee to the mountains and forests to transform those wastelands into fields and make them their own. This option may appear quite similar to the work conducted by the Benedictines and Cistercians across medieval Europe.⁸⁰ However, given the fact that China already had a large population and a well-developed agricultural society, there were not many lands to be reclaimed and cultivated by monks.

On the contrary, in England, the larger monasteries, as major landholding institutions with much local power and influence, were always in close contact with the Crown but were not forbidden to lease or use as collateral their lands and properties. It is true that the king routinely made heavy financial demands on religious houses, especially at times of war. However, before the Tudors, these demands were made in a context of cooperation, and no state bureaucracy was available to the king to carry

⁷⁴ For example, the monks of Birkenhead Priory operated the first ferry across the river Mersey. (Mason 1854, pp. 5–6).

⁷⁵ (Heale 2009, p. 16).

⁷⁶ For example, see (Wood 1981, p. 5).

⁷⁷ (Heale 2009, p. 228). Many scholars argue that the Buddhist monks live in society in close interaction with the laity and monastic communities deeply embedded in the secular social structure. This is partly true only if we review the Buddhism in a form of popular belief (or folk religion) and this phenomenon prevailed only from the late 15th century when established policy from the Early Ming Dynasty declined.

⁷⁸ (Yu 1981, vol. 11, p. 207). The similar situation in England, see (Clark 2000, pp. 13–32).

⁷⁹ (Yu 1998, p. 896).

⁸⁰ See for example (Burton and Kerr 2011, pp. 149–77).

out a systematic investigation and reform of monastic finances.⁸¹ In England, monastic communities were in charge not only of their liturgical life, religious formation, cultural endeavors,⁸² and economic activities,⁸³ but also of their own financial administration. As recently shown by Alisdair Dobie, English Benedictine Chapters (meetings of the heads of all monasteries in the kingdom) autonomously discussed the problem of transparency and consistency in the financial administration of monasteries and their properties across the realm. Especially since the second half of the 13th century, there was an impressive amount of self-regulation addressing issues such as loans, leases, best practice for income collection, accountability of the abbots, and the fitness of monks to whom were entrusted financial and managerial offices.⁸⁴ Some of the statutes approved by the Chapters contained innovative instructions that limited the authority of the abbot and detailed how to prepare and audit the financial statements of monastic houses, while still leaving room for management experimentations and traditions at the level of individual monastic communities.⁸⁵ Crucially, all these developments in managerial practices and financial administration happened within the jurisdiction of the Church and independently of royal control. Visitations by papal representatives (and not by lay officials of the government) represent the only case when the management of financial assets of English monastic houses was not investigated and evaluated by the general Chapters themselves.

Admittedly, in the decades leading up to the Dissolution, the involvement of the Crown in monastic affairs became an increasingly popular idea. While many of the abbots of large monasteries across England took greater public roles, these years also saw some kind of state intervention and, more strikingly, even religious leaders arguing that the reform of monasteries should be undertaken by the government.⁸⁶ For example, Cardinal Wolsey sought to acquire a number of papal bulls for the re-establishment of English monasteries shortly before his fall from power. Wolsey clearly stated this idea as he wrote: “let a commission be directed by the legates, and let it be entreated on behalf of his royal majesty” in order to place abbots under the authority of bishops. The most important of the papal bulls also permitted the closure of any monasteries of under 12 brothers or sisters⁸⁷ However, even though these bulls might have influenced the Dissolution process in the following decades, they were never acted upon before the break from Rome. Therefore, it seems that increasing control on the religious communities by the secular state is a global phenomenon in the late Middle Ages. Yet, the political background and the institutional history constituting the starting point in Ming China and late medieval England were very different. In the end, the English Dissolution was a much stronger and more shocking break with the past.

Even though Buddhist monasteries in China were strictly controlled by the state, the status of monk could still be beneficial, especially in terms of fiscal privileges and exemption from *corvée* labour. However, it was precisely the government’s power over monastic formation and certification that caused problems. Since the Tang Dynasty, in order to increase its revenues, the government often sold the certificates, and sometimes even used them as a sort of reward. Therefore, the certificate to prove the monk’s identity gradually became a commodity or even, in some extreme cases, a form of currency. Not surprisingly then, some of the motives behind the purchase of religious certificates

⁸¹ In fact, when in 1420 Henry V openly explored the possibility to design a reform of monastic finances, such a move was so unheard of that he had to immediately try to justify himself. (Jacob 1961, pp. 196–98).

⁸² So autonomous were the English monks in their formation and cultural output that these two spheres were at times overlapping and producing fascinating and innovative results, as discussed by Miriam Gill in a splendid essay on the role of monumental paintings in monastic education. (Gill 2000, pp. 119–35).

⁸³ The best introduction to this topic with regard to English monasticism is still (Snape [1926] 2014, especially pp. 71–118). For a more recent case study, see (Harvey 1977).

⁸⁴ (Dobie 2015).

⁸⁵ See for instance the 1343 statutes, which legislated on the identification and use of deficits and surpluses. (Pantin 1933, p. 39). The stream of self-regulation coming from the Chapters did not prevent managerial experiments at the local level, as in the case of Durham Cathedral Priory, where in 1438 “the most radical financial reorganization ever made” at that priory was carried out—dividing the office of bursar between three monks. (Dobson 1973, p. 253).

⁸⁶ A similar process was taking place in other western European kingdoms at this time. See for instance (Lehfeldt 2002).

⁸⁷ (Heale 2009, p. 233).

were criticized harshly by contemporaries. At the end of the Xuande reign (1426–1435), an eyewitness account described this situation:

“In recent years, farming and military households have wanted to escape from taxation and labor service. They pretended to be monks by the tens of thousands through the purchasing of monk certificates. They do not weave or farm, yet they enjoy food and shelter. Some of them even keep wives and concubines in their monastic cells and bring up sons and grandsons in the temples. There is nothing worse than this kind of moral degeneration.”⁸⁸

We have seen similar incidents in European history, the so-called “simony”. However, across Christendom local synods and councils often denounced and attempted to tackle the issue of simony, therefore showing once again the jurisdictional independence of bishops and abbots.⁸⁹ Moreover, in England, the buying and selling of certain clerical positions was mainly a transfer of interests within families, and the multiplication and actual sale of offices did not become a common phenomenon until the period of the Avignon Papacy. The emergence of this phenomenon itself shows that the Papal government had previously established a centralized system, quite independent from the political sphere.

Facing the situation described above, most members of the Buddhist elites thought that there was an urgent necessity for the government to step in and lead the reorganization of Buddhist monasteries. It is arguable that English king Henry V also attempted to enforce a return to stricter forms of observance in 1414–1415 by his plans to introduce the rigorous Celestine Order, which sought to observe the Benedictine Rule to the letter. However, his death in France soon allowed the black monks to deflect his reforming program without absorbing any of the proposed changes. More importantly, although Henry V was a secular ruler like the Ming emperors, his abortive plan was mostly religious in nature and never contemplated a complete government takeover of the formation and ordination of new monks comparable to the issuing and selling of certificates of ordination by the Chinese government.⁹⁰

Lastly, sexual morality is one of the most significant factors in the formation of religious identities. Among world religions, Catholicism and Buddhism are peculiar if not unique in their requirement that their clergy live a celibate life.⁹¹ Yet, legislation and enforcement of regulations on these matters came from different spheres on the two sides of Eurasia. In England, sexual misconduct by monks was dealt with by ecclesiastical law and fell under the jurisdiction of abbots, abbesses, and especially bishops, whereas in Ming China the same issues were strictly regulated and punished by the secular government.⁹² Similarly, while in England, monks who engaged in criminal activities were judged by their peers according to Canon law (except in exceptional cases like treason), in Ming China, Buddhist monks who were considered responsible for social unrest or who had turned into bandits were judged by secular authorities and were even punished more harshly than lay people who had committed the same crimes. Preoccupation about the danger posed by “wandering monks” is a recurrent theme in Ming sources. For example, in Wang Shixing we read:

“Zhongzhou monks have never received certificates. If they shaved today, they will be a monk, if their hair has grown then they will be a laity, according to what they wish. Today, shaved hair is a monk, tomorrow long hair is for the people, and they can do it for themselves. Therefore, with the popularity of the Bailian religion, thousands and hundreds will join it without any trace.

⁸⁸ Quoted from (Yü 1998, p. 919).

⁸⁹ For a survey of early anti-simoniatic legislation, see (Weber 1910, pp. 214–23). For the fundamental structure of the Church in England after the Norman Conquer, see (Cubitt 2012, pp. 376–90).

⁹⁰ (Heale 2009, pp. 126–27, 134–36).

⁹¹ (Dickens 1987, pp. 379–410; Marshall 2006, pp. 365–80).

⁹² In late medieval England, sexual misconduct in monastic houses was investigated and punished by the local bishops. On this, see the very interesting examples shown in (Knudsen 2012, especially chp. 4). In the Ming Dynasty, criticisms of Buddhist monks were mostly in terms of sexual morality, and monks always played negative roles in erotic novels in Ming and Qing Dynasties. See (Wang 2011, pp. 157–96).

The government cannot check, and even robbers and bandits tonsured and hid among the monks. When the situation calmed down, they went back to where they were before. For the so-called monks, no more than one among one hundred monks avoid drinking liquor and eating meat. There is no need to talk about the discipline of the monks.”⁹³

The witness of Chen Nai was scarier. As an alarmed investigating censor, he warned ominously in 1479 that:

“Unless we take timely measures, in the worst situations they [the monks] might gather together in the mountains and forests to plan criminal acts; and in less serious situations, they might manufacture rumors to disturb people’s minds. In any event, the harm they do is never small. Nowadays, among the robbers caught in Soochow and elsewhere, many are monks.”⁹⁴

This shows that, because in China there was no tradition of independent formation and self-government by monastic communities, once government control over monastic matters weakened, it was easy for a group of brigands to turn into a sect or anyway to take advantage of state certificates. To some extent, there was always something similar to European anticlericalism in ancient China among the elites and intellectuals, but in China, this was the rationale for the government’s powers and strict policies on the regulation of religious communities.⁹⁵

5. Conclusions

In 1526, official ordination platforms in Beijing and Nanjing were closed. Arguably, this marked the collapse of the regulation system established in the Hongwu era. With the end of strict examination and suppression policies, Buddhism in Ming China entered the “period of revitalization”, which is the subject of most studies on Ming Buddhism. The chronology of state intervention into the governance and liturgical life of monasteries in late medieval England is almost the opposite, as the years before the breakout of the Reformation witnessed some forms of Crown intervention in monastic affairs, including interference in elections and heavier taxation—even though a government-run bureaucracy legislating and enforcing every detail of monastic formation, ordination and conduct remained unthinkable.⁹⁶ However, in this article, we have highlighted differences in the histories of regulations of religious communities in China and England that go beyond contingent events or a reversed periodization. In Ming China, there was no internal hierarchy or regulatory body within Buddhism besides what the state supplied. Instead, English monastic houses in the pre-Reformation period took part in the long process of disentanglement of religious institutions from local and imperial political powers—a process that was under way in Europe since at least the 10th century. In other words, our comparative contribution to the study of parallel, yet not directly related, developments in monastic regulations in late medieval England and China has shown how, beneath the apparent similarities of Catholic and Buddhist monasticism, the secular governments at the opposite ends of the Eurasian world penetrated into and regulated the religious communities using different strategies, encountering different traditions of self-government and independence, and ultimately achieving very different results.

Our first conclusion is that in China, there existed a sophisticated bureaucratic apparatus through which the state regulated and monitored religious communities. Since the 14th century, when the reforms of the Hongwu reign enhanced the Monk-Official system and produced a more systematic legislation of monastic formation and conduct, the imperial government’s control over Buddhist monastic communities became even more all-encompassing. This context was markedly different from

⁹³ (Wang 1981, p. 441).

⁹⁴ Quoted from (Yü 1998, p. 920).

⁹⁵ Bearing this in mind, we can understand why the Jesuit priest Matteo Ricci firstly decided to wear the Buddhist dress, imaging that the monks enjoyed a prestigious social position as in Europe, but soon changed to Confucian dress after understanding the elites’ extremely negative view of Buddhist monks. (Yü 2015; Zhou 2016).

⁹⁶ (Heale 2009, p. 228; Sommerville 1992, pp. 3–17, 55–71, 165–77).

what we find in late medieval Europe, where the Catholic Church had its own independent jurisdiction and the power of local political figures over bishops and abbots was limited by the translocal authority of the Papacy. In England, the Pope had even functioned as feudal overlord and protector during the 120 years immediately preceding the period treated by this article. This papal fief confirmed and further stimulated the monastic traditions of self-government in England (stretching back not only to the apparently limitless agency given by St. Benedict's *Rule* to the abbot but also to the English reform blueprint found in the 10th-century *Regularis Concordia*).

With regard to the specific issue of formation and ordination, this article has detailed Ming China's policies and, more broadly, the consistent attitude of the government. Buddhist monastic examinations and certificates were tools for the secular control of monks. While since the early Ming period a uniform monastic curriculum was determined by Chinese government officials, in medieval England, the curricular and institutional autonomy of Catholic monasteries produced diverse teaching approaches, monks trained in more subjects than just ritual practices, and local intellectual traditions were free to develop. The same diverging patterns emerge also when we study the election of Buddhist heads and Catholic abbots. In Ming China, the imperial government selected the heads of monastic communities—practically mirroring the examination process used for the selection of secular officials. Moreover, the imperial court regulated the foundation of new monastic houses and strictly monitored the number of monks. Instead, in medieval Europe, such rigid state control over abbeys and priories was unthinkable, and in pre-Reformation England, monasteries sometimes boasted about their independence from secular interference, while dependent priories were overseen by their motherhouse alone.

Finally, we have reached some preliminary conclusions also concerning the regulation of the monks' personal conduct and economic agency. In Ming China, Buddhist monks' dresses were punctiliously regulated by the imperial government, which also significantly limited their freedom of movement. On the contrary, in late medieval England, monastic clothing was determined by the monasteries themselves, and the monks were not prevented from traveling by the Crown. As we have suggested above, in the case of Ming China, secular interference and regulation on these matters was underpinned by the desire to enforce separation, that is: to keep the monks away from the rest of society. Instead, in England, monasticism was one of the driving forces behind socioeconomic change since the early Middle Ages, and monks continued to engage economically, politically, and intellectually with society at large until the very end of this period. Once again, when looking at monastic economies, in China, we evidenced serious limits (such as the inalienability of land) imposed by the secular government on Buddhist monks' agency. Furthermore, when faced by the crisis caused by government commodification of certificates, Chinese Buddhists themselves expected the government to intervene. In contrast, for Europe, there is a body of literature that shows the countless economic activities in which Catholic monks regularly engaged. More specifically, regarding England, we found that Benedictine Chapters there were more receptive to papal reform plans and invitations to gather regularly and produce statutes than Benedictine assemblies in the rest of the continent. Looking at both recent research and an important number of primary sources, we showed that English Benedictine monks engaged in inventive and autonomous financial administration of their properties through an array of contractual tools, book-keeping, selection of candidates for managerial roles, and internal audit practices which prevented serious crisis and witness a degree of self-correction.

In addition, our research might also correct some of the comparative studies on the success of Buddhism and the failure of Christianity—especially Roman Catholicism—in China. For example, Eric Zürcher has suggested that we should interpret the fate of Buddhism and Christianity as a great paradox: institutional structures and strategizing were factors of weakness and vulnerability for Chinese Christianity, whereas Chinese Buddhism drew its strength from lack of planning and coordination,

from the spontaneous nature of its growth, and from the absence of any central guidance.⁹⁷ This is an insightful observation, but there is a significant factor that should not be overlooked: the administrative tools and culture of centralized governance developed by China between the Han dynasty and the late Ming period. If we imagine Buddhism entering China during the Ming Dynasty, facing such a rigid regulation over religious communities and monks, the whole picture and the odds in favor of Buddhism fundamentally change.

Author Contributions: Both authors contributed to the research and writing of this article. T.L.: research related to Ming China and Buddhist texts; research on Benedictine documents and literature on Catholic monasticism. M.S.: research on Benedictine documents and self-governance, English context, and Church History. All authors have read and agreed to the published version of the manuscript.

Funding: This research was funded by Shanghai Pujiang Program (2019PJC081) and by China's National Social Science Foundation grants (19CS009/18ZDA180).

Conflicts of Interest: The authors declare no conflict of interest.

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⁹⁷ ([Zürcher 2014](#), p. 391).

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