

## EXAMINING THE RULES OF CONSENSUS FROM THE CANONICAL PERSPECTIVE

ALEXANDER RENTEL\*

**ABSTRACT.** The rules of consensus posed problems for the Holy and Great Council both prior to the council and during. This paper explores some of these reasons and examines the canonical witness for a clearer understanding of consensus within the canonical tradition. The paper concludes with a call for greater conciliar activity in order to foster a more robust culture of consensus within the Orthodox Church.

**Keywords:** canon law, consensus, eucharistic ecclesiology.

### 1. On the Requirement for Consensus

At their Synaxis in Chambesy, Switzerland, January 2016, the primates of the autocephalous Orthodox Churches adopted a text entitled, *Organization and Working Procedure of the Holy and Great Council of the Orthodox Church*. This text was to guide the work for the Holy and Great Council, which was eventually held in Crete in June 2016.<sup>1</sup> A key component of this document is the requirement for unanimity for the approval of any texts or amendments.<sup>2</sup> In fact, the document specifies that the approval of any text must be unanimous for it to have “pan-Orthodox authority.” The primates of the Churches were well within the scope of their ministry to adopt procedures for the running of the council; nothing in the canonical tradition forbids the adoption of such rules, and consensus as a rule for decision-making has a long history in the Church. While it would be anachronistic

---

\* Assistant Professor in Canon Law and the John and Paraskeva Skvir Lecturer in Practical Theology, St. Vladimir’s Orthodox Theological Seminary. E-mail: arentel@svots.edu.

<sup>1</sup> Symeonides, N. Symeonides (ed.), *Toward the Holy and Great Council: Decisions and Texts (Greek and English)* (New York: Faith Matters Series 2a, 2016), 116-135.

<sup>2</sup> See Article 11.2, “Modifications of Texts”: “At the conclusion of deliberations, the approval of any change is expressed, according to pan-Orthodox procedures, by the consensus of the delegations of each autocephalous Orthodox Church. This means that an amendment that is not approved unanimously shall not be passed”; Symeonides, *Decisions*, 131. Article 13, “Adoption and Signing of Texts”: “The texts on the Council’s daily agenda that are approved unanimously...shall possess the following authority: ...2. Possessing pan-Orthodox authority...”; Symeonides, *Decisions*, 133.

to claim that the Council of Jerusalem described in the Book of Acts was a council like all subsequent councils, the description of this council did provide a paradigm for the Church. The particular phrasing of the Apostolic decree, "It seemed good to the Holy Spirit and to us (Acts 15.28)," expresses the two-fold requirement followed by the Church throughout the centuries that anything arrived at by the conciliar process must be consistent with the revelation, manifested in the consensus arrived at amongst those in the Church. These seemingly practical requirements emerge from the conviction that the Church is the body of Christ, where humans are united with Jesus Christ and each other by the grace of the Holy Spirit. In this image, this early definition of Church, only unity is possible.

### ***1.1. Consensus and Disunity***

The scepter of consensus being used not as a *method* of arriving at decisions and thus a sign of authenticity, but as a veto over the proceedings, however, loomed large prior to the council. And as the convening of the council drew near, the very idea of consensus posed difficulties to those Churches who did not come to the council, and also to those Churches who did come and found the insistence on consensus to be overly burdensome. So what had been rumors and thinly veiled threats in fact came to pass, and four local Churches chose not to come to the council. Calls from the different Churches for a postponement of the council, or even an adjournment, were made, because with all the local Churches not present, de facto meant that no consensus of the Orthodox Churches could be reached. Questions even arose from within the council itself about the requirement for consensus, not only in reaction to those Churches that did not come, but also in regard to the difficulties inherent in arriving at a consensus of unanimity, which is a high threshold. Of course, as we all know, the council did go on with participation of the majority of the Orthodox Churches.

### ***1.2. Two positions***

Strictly leaving aside the questions of intents, and assiduously avoiding any and all polemics and recriminations, I would like to identify and then address two presuppositions that underlie these two different approaches to the Cretan Council. Two positions in other words have emerged clearly post-council: 1. the council *did* happen even without the participation of all the Churches, consensus was reached, the council is binding even if not all the Churches were present, and the consensus of those present was not one of unanimity; and, 2. the council *did not* happen, because not all the Orthodox Churches were present. Hence, according to this line of thought, the Cretan Council is not truly a council, but another preparatory meeting along the way to a true pan-Orthodox council.

### 1.2.1. First Position

Obviously, most of those who attended the Cretan Council hold to this first position. It also finds its chief proponent in the bishop who presided at the council, His All-Holiness Ecumenical Patriarch Bartholomew. Already on January 22, 2016, in his opening address to the Synaxis of Primate of the Orthodox Churches, His All-Holiness distinguished between consensus and unanimity. The former, a canonical requirement, is not to be confused with the latter. Further, consensus allows for disagreement as long as the disagreement is carefully noted, but it also does not negate the original position. His All-Holiness also address the question of whether Churches can absent themselves or withdraw from the council and thus make the conciliar proceedings null. He points out,

The tradition of the Church knows numerous examples where conciliarity is applied in Councils, indeed even Ecumenical Councils, when certain Churches were absent – sometimes voluntarily, at other times involuntarily – from the sessions of the Council, without this at all preventing their operation. Many Council decisions were recognized retroactively by those who did not participate in them. So far as we know, dependence of consensus on physical attendance has no historical precedent.<sup>3</sup>

For His All-Holiness, drawing on the canonical tradition, a council can meet without full representation of all the local Orthodox Churches, agreements can be reached without full unanimity of the participants, and these decisions can be considered binding on all the Churches.

### 1.2.2. Consensus as a Method

His All-Holiness sees consensus in a manner consistent with the canonical tradition<sup>4</sup> and the governing procedures of contemporary organizations. As my colleague Peter Bouteneff has emphasized, consensus above all is a “deep

---

<sup>3</sup> “Keynote Address To the Synaxis of the Primate of the Orthodox Churches,” (Geneva, January 22, 2016), [https://www.patriarchate.org/address-/-/asset\\_publisher/MoQ1QIghH18P6/content/keynote-address-by-his-all-holiness-ecumenical-patriarch-bartholomew-to-the-synaxis-of-the-primates-of-the-orthodox-churches-geneva-22-01-2016-?\\_101\\_INSTANCE\\_MoQ1QIghH18P6\\_languageId=en\\_US](https://www.patriarchate.org/address-/-/asset_publisher/MoQ1QIghH18P6/content/keynote-address-by-his-all-holiness-ecumenical-patriarch-bartholomew-to-the-synaxis-of-the-primates-of-the-orthodox-churches-geneva-22-01-2016-?_101_INSTANCE_MoQ1QIghH18P6_languageId=en_US), accessed April 23, 2017.

<sup>4</sup> In this paper, I use the following English translations of the canons: For the Seven Ecumenical Councils: N. Tanner (ed.), *Decrees of the Ecumenical Councils*, vol. 1, *Nicea I to Lateran V* (Georgetown, 1990). For the Council in Trullo: G. Nedungatt and M. Featherstone (eds.), *The Council in Trullo Revisited*, *Kanonika 6* (Rome, 1995). For the Local Councils: P. Schaff and H. Wace, *A Select Library of Nicene and Post-Nicene Fathers of the Christian Church*, vol. XIV, *The Seven Ecumenical Councils of the Undivided Church. Their Canons and Dogmatic Decrees, together with the Canons of all the Local Synods which have Received Ecumenical Acceptance*, ed. H. Percival, (Grand Rapids, MI, 1988).

and sometimes challenging process” by which decisions are reached by a group, not where will is exercised by a minority.<sup>5</sup> Similarly, Peter Van Nuffelen, analyzing episcopal election in the fourth century, makes a careful argument that the very “role of canon law,” in the early fourth century, “was to safeguard the creation of a consensus, not to create it.” He further clarifies,

Canon rules did not prescribe a procedure that established the consensus; at best, they set minimum requirements for how it could be guaranteed that all parties could be duly involved in [the] process and that a true consensus could be found in the community.<sup>6</sup>

The canonical tradition expects and hopes for the consensus and unanimity of the participants at any council. The Church is the body of Christ, knitted and formed by men and women of every age, who, even in this privileged position, are sore tempted to sin. The canonical tradition of the Church, as we will see, has made allowances for the consensus of the majority and not only unanimity, precisely because of human weakness. Furthermore, the Church is not only a human organization, and as such consensus of participants is a sign alone of the authenticity of any part of a council’s work. The Church is a mystery, the unity of God and man in the person of Jesus Christ by the grace of the Spirit. Ultimately something is true and authentic because it seems good to the Holy Spirit.

### *1.2.3. The Second Position*

Five years earlier, His Holiness Patriarch Kirill of Moscow took an opposing view to that of Ecumenical Patriarch Bartholomew. In December 2011, he expounded his thinking, which also found further expression in those Churches who did not come to the council. Patriarch Kirill said,

We are told that the principle of consensus [*n.b.*, by which he means unanimity] was not always used in the epoch of Ecumenical Councils. At that time, the imperial power was the instrument of keeping church unity, but there is no such a mechanism at present. The Local Churches live and work in different countries and under specific conditions. If we do not take into account their opinion, it would be difficult to take decisions at the future Council by all, and this may provoke disorders.<sup>7</sup>

---

<sup>5</sup> P. Bouteneff, “The Great and Holy Council and the Implications of the Consensus Method,” *Toward the Holy and Great Council: Theological Reflections*, ed. N. Symeonides, Faith Matters Series 3 (New York, 1016).

<sup>6</sup> P. Van Nuffelen, “The Rhetoric of Rules and the Rule of Consensus,” *Episcopal Elections in Late Antiquity*, eds. J. Leemans, et al., *Arbeiten zur Kirchengeschichte 119* (Berlin, 2011), 245, 253.

<sup>7</sup> “His Holiness Patriarch Kirill: Surrender of the Principle of Consensus in the Pre-Council Process can bring about Disorders in World Orthodoxy,” <https://mospat.ru/en/2011/12/23/news55276>, accessed April 23, 2017.

The convictions here certainly went into the decision of the Russian Church not to come to the Cretan Council.

#### 1.2.4. *Sobornost*

It would be far too easy to dismiss this line of thinking as a cynical attempt to masquerade the “real” intentions of the Russian Orthodox Church. In fact, if nothing else, Patriarch Kirill’s assertion, which points to the importance of the Local Churches, *all* the Local Churches, and recognizing their equality, falls squarely in line with generations of Russian Orthodox thought that has regularly emphasized the concept of conciliarity, or *sobornost*, which itself forms a fundamental cornerstone to the expressions of Eucharistic and Baptismal Ecclesiologies. Lying behind Patriarch Kirill’s statement, in other words, is a presumption that

[T]he One, Holy, Catholic, and Apostolic Church manifests itself as a plurality of churches, each one is both a part and a whole. It is a part because only in unity with all churches and in obedience to the universal truth can it be the Church; yet is also a whole because in each church, by virtue of unity with the One, Holy, Catholic, and Apostolic Church, the whole Christ is present, the fullness of grace is given, the catholicity of new life is revealed.<sup>8</sup>

For Orthodoxy that has found itself in the West, both *sobornost* and Eucharistic Ecclesiology have had great resonance allowing the Church to engage in new ways with the modern world. As is well known, these ideas have inspired increased lay involvement in Church life and liturgical renewal, which are both so important to Orthodoxy in the West. Additionally, the expositions by so many Russian Orthodox theologians on *sobornost*, conciliarity, can only have contributed to the conciliar movement that culminated in Crete. The insistence on a consensus of unanimity, which is the hallmark of this second position, can be found throughout this traditions. For example, in the writings of Fr. Sergius Bulgakov, *sobornost* is defined precisely as “unanimity, a harmonious sharing of authority.”<sup>9</sup> To remain consistent with its own line of profound and resonate theological reflection, the Russian Orthodox Church would have had great difficulties coming and participating in the Cretan Council once other local Orthodox Churches pulled out.

---

<sup>8</sup> A. Schmemmann, “Ecclesiology Notes,” *St. Vladimir’s Seminary Quarterly* 11, no. 1 (1967): 37-38.

<sup>9</sup> S. Bulgakov, “The Orthodox Church,” *A Bulgakov Anthology*, eds. J. Pain and N. Zernov (Philadelphia, 1976): 127.

## **2. Consensus in the Canonical Tradition**

To be sure, the arguments and thought processes that make up these two positions are closer than the diametrically opposed results would suggest. Both positions place a high value on conciliarity, synodality, and both accord priority to pan-Orthodox solutions to common problems. Both would even go so far as to insist that the place to do this type of work is in the synodal structure of the Church. They differ, it would seem to me, in their conception of consensus. One sees consensus clearly as a method, the other sees it as the result, the sign of the Church being the Church. Both positions can find support in the canonical tradition, which I would like to now review. From the tradition, two types of consensus emerge. The first concerns matters of faith and canon, where consensus does serve as a sign and guarantor, and the second where the role of consensus is discussed in regard to synodal procedure.

### ***2.1. Consensus of Faith***

Trullo 1 speaks of the consensus of unanimity with regard to faith when it says, "It is the best rule, when beginning any speech or action, to begin with God and to end with God." This canon goes on to enumerate the faith defined and proclaimed by previous councils. Similar provision for such consensus can be found in canons throughout the canonical literature where a council expresses its consensus with the faith defined by previous councils (I Constantinople 1, Ephesus 7, Carthage 2, Trullo 1, II Nicea 2). Underlying these canons is the fundamental conviction of an order (τάξις) that exists in the Church that emanates from the heavenly realms and encompasses all things in the Church. As Trullo 1 says, conciliar activity best begins with God, because the Church only knows and consequently can only talk about God. And, in the end, the Church considers only these matters, because such knowledge of God concerns ultimate things. The coherence that later councils have with earlier ones, in fact their very authenticity, comes directly from their consensus with this knowledge and is found in the conciliar creeds, decrees, or definitions. The order of the Church necessitates that such consensus be the highest priority of a council. Furthermore, in the uncertainty of any present deliberation, in response to questions never faced, using what the Church has canonized and received allows for it to craft decisions and responses that are consistent with the tradition, but meet the needs of the day. In what has been mentioned so far, the canonical tradition expects a consensus of unanimity, the end product of any conciliar deliberation must be in accord with previous councils. With regard to matters of faith the consensus of unanimity is paramount as faith provides

the shape and contour of the order that extends from heaven throughout the Church. This consensus too is easy to locate and has been proclaimed, confessed, defined, by numerous councils. In the end, no council could ever overturn matters of faith or break with this unanimity of faith. To do so would indicate a break or rupture of part or of the whole council.

### **3. Synodal Procedures in the Canons**

Diverse canons have to be examined with regard to consensus as a method for coming to decisions. Few canons from the tradition speak directly about the internal procedures for the running of a synod of any type in the Church. The canons speak directly about the need for provincial synods to take place once in the Spring and once in Fall (Apostolic 37, I Nicea 5, Antioch 20, Chalcedon 19, Trullo 8, II Nicea 6), though the exact time is up to the metropolitan (Antioch 20), at a place where the metropolitan bishop decides (Chalcedon 19, Trullo 8), and where he himself must preside in order for the gathering to accounted as a full synod (Antioch 16, 20). These canons provide for a wide range of topics that can be discussed at these meetings that can be summed up in the words of II Nicea 6. Synods, this canon says, meet in order to “discuss canonical and evangelical matters.” I Nicea 5 charges synods with making the necessary inquiries in matters under its consideration so that there might be “general consent” in their decisions. While the canons typically speak about the work of a provincial synod, they also refer the possibility of greater regional synods (Antioch 12, Constantinople 2), and a diocesan synod (I Constantinople 6). It is a reasonable inference that the procedures and activities of these synods are similar to those described for the provincial. Furthermore, the content of the canons themselves testify to the broad parameters of work that can be done by synods at any level of the Church. These parameters do no limit the work of subsequent synods, but testify to the wide expanse of work that councils of what type can undertake.

#### ***3.1. Consensus with the metropolitan***

The expectation of the canonical tradition, as enumerated above all in Apostolic 34 and Antioch 9, is that there will be consensus amongst the synod, but especially between the metropolitan, he “who is first among them,” and the “bishops of every nation.” Apostolic 34 speaks of this reciprocal relationship squarely in the context of the heavenly order. Bishops can do nothing without the consent of the metropolitan, but he can do nothing without “the consent of all; for so there will be unanimity and God will be glorified.” Beyond these

particular canons, one must turn to the canons that speak about the synodal processes of electing bishops or deposing clergy as providing the paradigms for synodal procedures. These canons emphasize further the need for consensus amongst the members of a synod, but especially the synod with the metropolitan. I Nicea 4 provides both for the opportunity of bishops who are unable to travel to synod to send in their vote for episcopal election and express their consent. This canon concludes by saying that the right to confirm the election proceedings belongs alone to the metropolitan bishop. The language of I Nicea 6 on this point is even stronger, "if anyone is made bishop without the consent of the metropolitan, this great synod determines that such a one shall not be a bishop." From these canons it is clear, consensus of a synod requires the confirmation of its president.

### ***3.2. The Decision of the Majority***

While the canons on episcopal election do show preference for a consensus of unanimity, they also allow for what they call a "consensus of the majority." As mentioned, the second part of I Nicea 6 speaks about the ordination of a bishop, and says that "if however two or three by reason of personal rivalry dissent from the common vote of all, provided it is reasonable and in accordance with the church's canon, the vote of the majority shall prevail." Antioch 19, also regarding to the election of bishops, reiterates the synodal processes and strives for unanimity maintaining it as the rule, but acknowledges that it is possible "in the presence, or with the consent, of the majority." While a consensus of unanimity is hoped for, under certain circumstances a decision of the majority prevails.

### ***3.3. Deposition of Bishops***

That speak about the deposition of bishops look for consensus in this process, but make similar provision for a decision of the majority. While the canonical tradition looks for unanimity in the matter of depositions, as in any synodal action, even saying that when the decision for deposition of a bishop is unanimous, the judgment "stands firm" and is not open for an appeal to others for further consideration (Antioch 15). Antioch 14, however, allows a metropolitan to ask bishops of neighboring provinces to join his synod for the "settlement of all disputes," if that synod cannot reach consensus. The other bishops, according to the canon, "shall add their judgment and resolve the dispute, and thus, with those of the province, confirm what is determined." Notably absent here is a lack of requirement for a consensus of unanimity in the rendering of a decision. Rather the augmentation of neighbouring bishops could provide

for a decision one way or another based on a greater majority. Again, Antioch 15 describes what happens when there is unanimity amongst the bishops: “If any bishop, lying under any accusation, shall be judged by all the bishops in the province, and all shall unanimously deliver the same verdict concerning him, he shall not be again judged by others, but the unanimous sentence of the bishops of the province shall stand firm.” In other words, if the sentence is unanimous, there is no need to solicit other bishops to expand the provincial synod. But by implication, these two canons these two canons signal that a decision can be reached by a synod that is unanimous, but also by a consensus of majority. The regional council of Constantinople in AD 394 under Nektarios, decreed that the deposition of a bishop must be by “vote of a larger Council, and if possible of all the provincials..., in order that the condemnation of one deserving to be deposed may be shown by a vote of the majority, in the presence of the one being tried, with greater accuracy.”<sup>10</sup>

#### 4. The Rule and Practice

As has been said, the rule and hope for the Church in its process of deliberation is for a consensus of unanimity among bishops gathered in synod. The canons themselves, in fact the whole canonical tradition itself, exists to protect and foster the method by which consensus is reached. And so, with the exception of matters of faith, certain provisions appear in the canons that allow under certain circumstances for a consensus of the majority. Drawing upon notable examples from Church history and conciliar practice, this allowance for the consensus of the majority can be witnessed. Two such notable examples can be drawn from the Council of Chalcedon. At the Fourth Session of the Council, after the deposition by the Council of Dioscoros, ten bishops from Egypt refused to sign the *Tome of Leo* or the conciliar *Acta*, even under great pressure from the members of the Council. They claimed that they could not sign because their archbishop had been deposed and the Alexandrian See was vacant. They did not have the authority on their own to agree to or sign anything. At the same council, at the Sixteenth Session, the Roman Legates demanded their objections to the adoption of what would become Chalcedon 28 be recorded in the official minutes. Pope Leo, whose *Tome* was famously affirmed at the Council, continued to protest the adoption of this canon long after the Council was over. Likewise at the Council in Trullo, the Penthekte, the Roman legates surely did not agree to canons that expressly condemned practices in their Church: Trullo 3, 13, 36 (maybe?), and certainly not 55. In all three examples cited here, each prominent in its own right,

---

<sup>10</sup> As systematized by *The Pedalion*, this is canon 2 of this council.

the lack of agreement or the dissent are recorded by one Church in communion with other Churches, Roman and the Eastern Churches, Alexandria and the other Churches, and *remaining* in communion afterwards.

#### **4.1. A Way Forward?**

Any way forward from this seeming impasse between the two positions I have enumerated and discussed must acknowledge that there is no consensus in the discussion of consensus. Often, it would seem, different parties use this word with vastly different meanings. From this starting point – accepting that there are different meanings to this word – the different concerns can be addressed by both sides. So, the process of forming a consensus has to be looked at with careful attention to dissent and discerning whether it is mere obstruction, caused by human concerns, or a misunderstanding, and in reality a helpful contribution to the deliberation. If it is obstruction, the process of seeking consensus can move forward without full unanimity. The canonical tradition provides clear guidance on this. This progress is necessary for a successful outcome of any council. Likewise, the full resonance of a consensus of unanimity, conciliarity, synodality, sobornost has to be taken into consideration. Each Local Orthodox Church is both the One Church, and one of the many Orthodox Churches. The implications of this ecclesiological vision do not easily allow for anything less than a consensus that is marked by the unanimous assent of all the Orthodox Churches. As Metropolitan Kallistos (Ware) has said, “Even if moral unanimity is an ideal of which in practice we regularly fall short, at least let us not seek to justify this state of affairs, but let us remain painfully conscious of our failure.”<sup>11</sup>

#### **4.2. Conclusion**

To be sure, the way forward is more conciliar action on the part of the Church. The Church will develop a culture of consensus, with the full range of meaning of this word, only through continued and regular interaction, engagement, and dialogue.

---

<sup>11</sup> K. Ware, “Patterns of Episcopacy in the Early Church and Today: An Orthodox View,” *Bishops, but What Kind?* (P. Moore, ed.) (London 1982) 18-19.

## REFERENCES

- “His Holiness Patriarch Kirill: Surrender of the Principle of Consensus in the Pre-Council Process can bring about Disorders in World Orthodoxy,”  
<https://mospat.ru/en/2011/12/23/news55276>, accessed April 23, 2017.
- “Keynote Address to the Synaxis of the Primates of the Orthodox Churches.” Geneva, January 22, 2016.  
[https://www.patriarchate.org/address/-/asset\\_publisher/MoQ1QIgH18P6/content/keynote-address-by-his-all-holiness-ecumenical-patriarch-bartholomew-to-the-synaxis-of-the-primates-of-the-orthodox-churches-geneva-22-01-2016-?\\_101\\_INSTANCE\\_MoQ1QIgH18P6\\_languageId=en\\_US](https://www.patriarchate.org/address/-/asset_publisher/MoQ1QIgH18P6/content/keynote-address-by-his-all-holiness-ecumenical-patriarch-bartholomew-to-the-synaxis-of-the-primates-of-the-orthodox-churches-geneva-22-01-2016-?_101_INSTANCE_MoQ1QIgH18P6_languageId=en_US). Accessed April 23, 2017.
- Bouteneff, P. “The Great and Holy Council and the Implications of the Consensus Method.” In *Toward the Holy and Great Council: Theological Reflections*, edited by N. Symeonides. Faith Matters Series 3. New York, 1016.
- Bulgakov, S. “The Orthodox Church.” In *A Bulgakov Anthology*, edited by J. Pain and N. Zernov. Philadelphia, 1976.
- Nedungatt, G. and M. Featherstone, eds. *The Council in Trullo Revisited*, Kanonika 6. Rome, 1995.
- Schaff, P. and H. Wace. A Select Library of Nicene and Post-Nicene Fathers of the Christian Church. Vol. XIV, The Seven Ecumenical Councils of the Undivided Church. Their Canons and Dogmatic Decrees, together with the Canons of all the Local Synods which have Received Ecumenical Acceptance. Ed. H. Percival. Grand Rapids, MI, 1988.
- Schmemmann, A. “Ecclesiology Notes.” *St. Vladimir's Seminary Quarterly* 11, no. 1 (1967).
- Symeonides, N., ed. *Toward the Holy and Great Council: Decisions and Texts* (Greek and English). New York: Faith Matters Series 2a, 2016.
- Tanner, N., ed. *Decrees of the Ecumenical Councils*. Vol. 1, Nicea I to Lateran V. Georgetown, 1990.
- Van Nuffelen, P. “The Rhetoric of Rules and the Rule of Consensus.” In *Episcopal Elections in Late Antiquity*, edited by J. Leemans, et al. *Arbeiten zur Kirchengeschichte* 119. Berlin, 2011.
- Ware, K. “Patterns of Episcopacy in the Early Church and Today: An Orthodox View.” In *Bishops, but What Kind?*, edited by P. Moore. London, 1982.

