

FRANCE AND THE NETHERLANDS: IMMIGRATION, ASSIMILATION, AND
CONFLICT

By Heather Main

A Thesis

Presented to the Faculty of
University of Washington
In Partial Fulfillment of the Requirements for the Degree of
Bachelor of Arts with Honors in Comparative History of Ideas
May 2006

Dominic Corva
Thesis Advisor

Observe two very different European countries: France does not officially recognize any racial differences among its citizens. It does not keep racial data, institute racial quotas or affirmative action programs, or allow for any religious or (non-French) cultural dress in schools (Calvès, 2004). In contrast, the Netherlands until recently had some of the least-restrictive citizenship requirements in the EU; The state sponsored ethnic diversity clubs and instituted policies that encouraged primary school children to speak their native Arabic, Turkish, or Berber in school. France as a country has stressed assimilation above all. One could argue that by officially ignoring cultural differences France forced assimilation of its immigrant population. On the other hand, the Netherlands has embraced the idea of multiculturalism and refused to stress assimilation, even linguistic assimilation. But curiously, the two countries have had similar problems with immigrant unrest and deepening cultural divides, and violence has erupted in both countries.

It is possible in most large European cities to live in a neighborhood comprised of immigrants representing most major ethnicities. Assimilation is always a matter of degree, of course. But the larger the immigrant population gets, the more likely they are to transplant their own tradition and laws without regard for the laws and traditions of the country they move to. In France, for instance, polygamy is illegal. France as a country does not have a tradition of stable governments (from 1789 to 1962, the French went through five democratic regimes, three monarchies, two empires, and a fascist dictatorship, all of which ended in violence (Nadeau & Barlow 2003). But perhaps because it has had such a turbulent governmental structure, France has a strong and

continuing set of traditional values that transcend governmental policy and which its citizens consider close to sacred. Polygamy has never been an acceptable arrangement in France. (Adultery, of course, is a different concept all together.) Still, newer immigrants from African countries continue to practice polygamy in France, despite numerous efforts by the government to ban the practice. The practice is much rarer among older, established African immigrant populations (Scilino, 18 Nov. 2005). To the newer immigrants, this continuation of their cultural practice is their right; however, to the traditional citizens of France, it is seen as a challenge and a threat to their way of life.

Some of this anti-assimilation feeling in countries may be due to the rising number of immigrants in the EU. Members of the EU are no longer completely sovereign when it comes to immigration policies, since the EU has forced many of its member countries to accept more immigrants than they had previously allowed. Official immigration policies agreed upon by member states in the Amsterdam Treaty have opt-out clauses and are not binding (Geddes, 130) but inter-member economic relations and the principle of freedom of movement of people across member borders—one of the famous Four Freedoms the EU was founded on—compel many states to adopt more open policies with regard to immigration and asylum.

Many of these immigrants are Muslim, and although they have not yet done so, they could collectively have a powerful effect democratically. Worldwide, Islam as a religion is growing by about 2.9 percent a year—faster than the world population (which increases by about 2.3 percent per year). Last year, seven percent of babies born in the EU were Muslim; in Brussels, it was 57 percent. If current trends continue, by 2020 ten percent of the European population will be Muslim (Canadian Society of Muslims, 2006).

The French Muslim population is currently the largest in Europe, with an estimated 8 to 9.6 percent of the population Muslim (BBC News, Dec. 2005). In the Netherlands, the Muslim population is not too far behind, estimated at around 5.8 percent (BBC News, Dec. 2005). This growing trend sparks the fear by traditional residents of EU countries, France and the Netherlands among them, that foreigners will outnumber them and that they will essentially be forced to assimilate to immigrant culture instead of the other way around. Further, media portrayals of Islam and Islamic countries add to the fear that Muslims have values incompatible with Christian and European values, which is untrue.

This paper will set out to consider the changing nature of immigration in two EU countries—France and the Netherlands. France and the Netherlands have opposite approaches to immigrants: France forces assimilation, while the Netherlands encourages multiculturalism. Neither of these approaches seems to be working. This paper will begin with a brief examination of the terms ‘assimilation’ and ‘multiculturalism,’ and how scholars and writers use them. Then, the evolution of the conception of citizenship in Europe—from national to cosmopolitan—will be examined. Next, a brief history of the immigration policies of France, the Netherlands, and the European Union will provide the background and context in which the current immigration policies are played out. A discussion of post colonialism, a school of thought that examines the relationship between cultures, particularly between those that have traditionally been colonizers (like France, the Netherlands, and most of Europe) and those that have been colonized (like Algeria, Aruba, and most of Africa) will add to the thoughts behind some of these immigration policies. Then, the “us-versus-them” mindset that currently permeates both

France and the Netherlands will be addressed, along with current examples of recent violence that has sprung from these attitudes.

Assimilation and Multiculturalism as Terms of Immigration

Despite belonging to the EU as equals, citizens of member states are much more likely to identify themselves as citizens of their nation rather than as citizens of the EU. Hundreds of years of national identities have shaped each country, making change difficult. “Integration while preserving the ethnic minorities’ identity is a white lie that should not be encouraged by the government,” wrote Dutch journalist Paul Scheffer. (Engbersen, 72) Unlawful or not, citizens who do not fit the traditional national mold are treated differently. Is a French citizen who was born and raised in Turkey the same as a citizen who can trace his ancestry back to the French Revolution? Does a French Muslim have access to the same rights as a French Catholic? “The development of the modern notion of identity has given rise to a politics of difference,” notes Charles Taylor (Taylor, 38). Everyone should be recognized as special and as possessing a unique identity. But in this instance Taylor uses recognition of identity in a different way. “With the politics of equal dignity, what is established is meant to be universally the same, an identical basket of rights and immunities; with the politics of difference, what we are asked to recognize is the unique identity of this individual or group, their distinctness from everyone else” (Taylor, 38). Therefore, he concludes, “the idea is that it is precisely this distinctness that has been ignored, glossed over, assimilated to a dominant or majority identity. And this assimilation is the cardinal sin against the ideal of authenticity” (Taylor, 38).

Assimilation, what has been demanded of immigrants implicitly and occasionally by law in Europe, is at odds with multiculturalism.

Although the same thing—immigration—is happening everywhere, there are two distinct ways nations interpret an immigrant’s transportation of his culture to the new country. “While communications, political and economic interactions increasingly cross the borders of states, nations and ethnic communities, symbolic borders and separate group identities are nevertheless asserted. International migration combines these two tendencies in an exemplary way,” explains Rosemarie Sackmann. “In this context, the perceived efforts of migrants to maintain their cultural and ethnic identities are often blamed as a cause of conflict within nation states. What some see as a development that enriches a society’s cultural reservoir, others take as a threat to their own culture and conception of themselves” (Sackmann, 1). This conflict is currently being played out in France and the Netherlands, where the public debates immigrant rights and cultural preservation are common.

For European immigrants, what exactly does the process of integration entail? Godfried Engbersen proposes a general model of societal integration, organized in “spheres of integration” (Engbersen, 63). Modern societies are integrated in three dimensions: functional integration affects questions of coordination and basic communication; moral integration consists of questions of justice and solidarity, and expressive integration addresses identity. In addition there are several spheres that are crucial to social integration—the spheres of law, politics, work, education, religion etc. In France and the Netherlands, recent immigrants have not shown as much inclination to move past the first sphere; they do not always embrace the laws and mores of their new

country, or identify themselves primarily as citizens of that country. Proponents of multiculturalism see this as a sign that the government has failed to accommodate newcomers. Anti-immigration activists see this as an indication that immigrants do not respect the culture of their new country.

Bernhard Peters argues that a culture, unlike a person, does not have a stable and coherent collective identity. “There are many elements of a group culture or national culture which are not necessarily part of collective identity: stocks of knowledge, many value and norms with no specific relation to the life of a particular community, patterns of individual identity, elements of expressive or aesthetic culture: music, literature and so on ...” (Peters, 17). Unlike the individual, a group or collective identity therefore cannot be treated as homogenous or completely coherent. “While we might suppose that some kind of consistent and coherent individual identity is necessary for a ‘normally’ functioning [individual] personality,” Peters argues, “it is not obvious that the analogue statement is true for the collective ...identity” (Peters, 14).

Following this line of thought, Rainer Baubock argues that all modern societies are internally multicultural. And if this is so, precisely which identity are immigrants supposed to assimilate to? He begins his argument by citing an October 2000 statement by a German politician, Freidrich Merz, who launched a debate on the need for immigrants to integrate into the *Leitkultur*, the guiding or defining culture. In the public controversy that followed, the president of the Jewish community in Germany asked whether outbreaks of racist violence in Eastern parts of Germany should be seen as part of this defining culture immigrants should accept (Baubock, 37). The point, of course, is that no culture is homogeneous, as Peters argues. Further, public cultures in societies of

immigration must be self-transformative. Baubock then considers the difficulty of self-transformation in a non-homogenous society. There is a difference between accommodating immigrants and actually allowing them to become part of society in a meaningful manner. For instance, public history becomes self-transformative if “it is no longer written as that of a particular nation” (Baubock, 55). National identity is formed by excluding certain groups whose collective identities do not link them to the nation they reside in. “The alternate perspective is that ongoing immigration uncovers, or newly establishes, historical links that require a constant rewriting of the past” (Baubock, 55). In contrast, linguistic accommodation is not transformative. Although immigration changes a culture’s language (by the addition of ‘foreign’ words into the public vocabulary) this is a sign of cultural openness, rather than transformation. How exactly to facilitate this transformation is debatable.

For the purposes of this paper, assimilation will refer to the adoption of another culture’s traditions and values, usually but not always at the expense of another (previous) set of cultural values. Multiculturalism will refer to a theory that stresses tolerance and the embrace of many different cultural values and traditions, and the belief that all cultural viewpoints are equally valid.

Immigration and Citizenship

As the EU’s borders have become more permeable and the number of non-European immigrants, large numbers of them Muslim, have settled in countries like France and the Netherlands, the conception of citizenship has become a more complex.

Immigration, always a hot-button issue in the EU, has become even more so as the EU expands its borders and immigrant populations within countries become a significant minority with voting rights, distinct traditions and religions of their own, and oftentimes, less of a desire to assimilate than the generations of immigrants before them.

Riots and violent protests are not an unusual practice in France, historically speaking. But French citizens in the last few years have been greatly surprised by the deep unhappiness expressed by immigrants and their French-born children concerning the treatment of immigrants, articulated in the form of rioting. In the Netherlands, where protest is also common but almost always peaceful and the attitude of citizens and the state institutions considered one of the most liberal in modern Europe, a sudden surge in violence in the form of violent political murders has greatly surprised Dutch citizens.

Evolving parallel to the debate over assimilation and multiculturalism has been the debate over citizenship—what does it mean to be a citizen of the EU, and what does it mean to be a citizen of France or the Netherlands? T. H. Marshall's work on the nature of citizenship is an excellent starting point in examining the modern conceptions of citizenship. Marshall's highly influential and critiqued work *Citizenship and Social Class* laid out three distinct parts of citizenship: civil, political, and social. "The civil element is composed of the rights necessary for individual freedom....by the political element I mean the rights to participate in the exercise of political power,....by the social element I mean the whole range from the rights to a modicum of economic welfare and security to the rights to share to the full in the social heritage and to live the life of a civilized being according to the standards prevailing in the society," he writes. Further, these three elements of citizenship evolved one after the other, throughout slightly overlapping

historical periods, to create the modern definition of citizenship, which includes or ought to include all three, Marshall argues (10-11).

The part of citizenship that is most relevant to the discussion of French and Dutch culture is the third conception, social citizenship. This is a very European conception of citizenship—and the one most likely to be the reference point for most traditional European citizens. They expect immigrants, as a natural part of becoming a citizen, to share fully “in the social heritage” and live “according to the standards prevailing in the society”—French or Dutch standards of culture. EU citizenship is more cosmopolitan in conception. Although it does not presently work this way in all member countries, ideally a citizen of an EU member state would also automatically be an EU citizen and able to live, work, and travel through member states without being stopped at the border. The EU structure envisioned has occasionally been explained as a United States of Europe. The fundamental values and freedoms that the EU proposes to be adopted by all of its members are considered fundamental by Western states. The question raised by such cosmopolitan ideals is, should the EU impose Western-based rights and freedoms on all of its member states—especially as these member states contain increasingly high numbers of non-Western immigrants?

While the Charter of Fundamental Rights and Freedoms notes that the EU respects “cultural, religious and linguistic diversity,” (Charter of Fundamental Rights and Freedoms of the EU, article 22) another EU Declaration states plainly that “there can be no valid exemption from the principles enshrined in those instruments [the Universal Declaration of Human Rights and other international human rights agreements] through special provisions based on national, cultural or religious considerations.”(Declaration of

the European Union on the Occasion of the 50th Anniversary of the Universal Declaration of Human Rights, chapter B, article II). These statements make it unclear how or if the EU would deal with the serious cultural differences within or between the member states that involve issues and rights listed in the Charter, and they give the member states of the EU no clear direction on how to deal with cultural issues that conflict with state or EU laws.

One problem with using Marshall when examining EU member countries is exactly this cosmopolitan bent of EU citizenship. In order to become members of the EU, states must adopt all of the EU rules, regulations, and treaty agreements. While each state maintains its own identity and—arguably—its sovereignty, the EU’s rules regarding immigration and citizenship rights overrule the individual states. “T.H. Marshall took the existence of the nation-state for granted in his seminal analysis of citizenship and its rights and institutions,” writes Maurice Roche (716). “The assumption of a distinctively independent and internally connected ‘national culture,’ national capitalist economy and nationalist polity ...underpins Marshall’s own analysis but also much of the new sociology of citizenship including much of the work on social rights and gender issues.” This assumption is flawed, Roche notes, because it neglects the impact and implications of sub-national and transnational citizenship (Roche, 716). Transnational—or cosmopolitan—citizenship is often touted as the next step in the evolution of citizenship. Briefly, the argument is as follows: Why do nation states who believe so strongly in democracy domestically put up with a very undemocratic international order? The answer is to create, if not a world government, a sense of democratic order in which every person would be a citizen not only of a nation but of the world. Speaking in 2001, the late Prince

Claus of the Netherlands endorsed this idea of cosmopolitan citizenship by reversing the traditional order of loyalty: “One question that is very difficult for me to answer and which is repeatedly asked of me; how does it feel to be Dutch. My answer is: I don’t know how it is to be Dutch. I have various loyalties and I am a world citizen and European and Dutch” (Expatica, 2004).

There are also several theories about multiculturalism that are relevant to the discussion, especially since in many instances multiculturalism intersects with ideas about citizenship, civil rights, and identity. “Multicultural societies and communities that stand for the freedom and equality of all people rest upon mutual respect for reasonably intellectual, political, and cultural differences,” explains Amy Gutmann in an introduction to the writings of Charles Taylor. Mutual respect, she clarifies, requires people to articulate their arguments clearly and fairly, and to be able to tell the difference between “respectable and disrespectful disagreement.” Most importantly, people must be open to changing their opinions when faced with well-reasoned arguments. She finishes with a defensive warning: “The moral promise of multiculturalism depends on the exercise of these deliberative virtues.” (Gutmann, 24). The implication is that governments who do not ensure these deliberative virtues should not blame multiculturalism for the failure of multicultural policies.

Citizenship and civil rights, along with the politics of difference, figure prominently in Taylor’s arguments. “What is to be avoided at all costs is the existence of ‘first-class’ and ‘second-class’ citizens,” Taylor writes in an essay on multiculturalism (38). The details of multicultural policies may vary according to the country, government, time period or other factors, and are often controversial, he notes. Equalization in some

cases affected only civil and voting rights; in other cases it has extended into the socioeconomic sphere. But all of these cases have one common denominator: “People who are systematically handicapped by poverty from making the most of their citizenship rights are deemed on this view to have been relegated to second-class status, necessitating remedial action through equalization” (Taylor, 38). His illustration of this second-class citizenship phenomenon uses black Americans before the civil rights movement. But it could just as easily be applied to immigrants living and working today in France or the Netherlands.

The idea of second-class citizenship is not limited to France and the Netherlands, of course. One of the most extreme examples of this idea of second-class citizenship comes from Germany. German governmental policy and tradition held that Germany was not a country of immigration, despite importing large numbers of immigrants under ‘guest worker’ (*gastarbeiter*) policies since WWII. Although Germany had legislation granting political asylum, it did not have any legislation regulating immigration. By 1998 there were 7.3 million foreign citizens living in Germany, nearly 9 percent of the population. In large cities, the number of non-German citizens reached up to 25 percent. But none of these people were legally considered German citizens. Former German Federal Minister of the Interior Otto Schilly recalled that upon entering office in 1998, “the relevant [citizenship] law dated from 1913. It still bore the signature of Kaiser Wilhelm II. Under this law, a German citizen was someone whose mother or father was German. The law also excluded from citizenship those people whose parents or themselves had come to Germany as “guest workers.” (Schilly, 2005) In Germany then, ‘guest worker’ became code for second-class citizen.

Fears of immigration have not lessened with the expansion of the EU. Many countries in the EU suffered mass rallies and demonstrations protesting the application of Turkey for membership into the EU. They feared a large influx of ‘foreigners’ if Turkey became part of the EU—foreigners who would be EU citizens and thus difficult to keep out, or deny welfare or other citizenship rights. Similarly, upon the entry of Poland to the EU, fears that the ‘Polish plumber’ (a stereotypical statistic, like the ‘soccer moms’ who became an important part of election campaigns in the United States) would now move en masse to wealthier EU countries and take jobs and social benefits away from current citizens.

Theoretical Approaches to Immigration

Alongside debate concerning assimilation, multiculturalism, and citizenship have evolved other theories that have influenced immigration policy in Europe. The basic premise of Georg Wilhelm Friedrich Hegel’s Master-Slave Dialectic is that no one exists as a person if he or she is not recognized. “Self-consciousness,” Hegel writes, “exists in and for itself when...it so exists for another; that is, it exists only in being acknowledged” (Steinhart, 1998). A rational, autonomous being longs to be recognized and can do this, according to Hegel, one of two ways: Either an autonomous being can challenge another and win, or he can become independent and self-conscious through the production of goods. When two self-conscious beings recognize each other, the encounter is perfectly symmetrical: Each sees himself (self-consciousness) in the other. The problem is that each being wants to dominate the other, because power is repression, according to Hegel,

and domination is a natural desire. Therefore, the symmetry of mutual recognition is unstable. Only through a fight to the death can this symmetry be resolved. It is not necessary to actually kill or be killed, however. What is important is that each be willing to die rather than submit to the other. The problem with challenging another being as a way to gain power is that, if the other being dies rather than submit, he is indeed a self-conscious being, but one who is unable to recognize the challenger's power (because he is dead). If one being surrenders and submits, the victor has the power of life and death over the loser. If the victor kills the loser, however, the loser cannot acknowledge the victor as self-conscious. So, instead, the victor enslaves the loser. The slave then lives for another, while the victor lives for himself. But, the slave can become a rational, autonomous being through the production of goods. By learning to work and produce things, the slave grows skilled while the master grows lazy. The balance of power shifts as the master, on whom the slave had been dependent, now becomes dependent on the work of the slave.

Most importantly for France and Europe, Hegel's work influenced French philosopher Frantz Fanon, who concluded through his interpretation of Hegel's Master-Slave Dialectic that a violent struggle was necessary to free Algeria from French colonial oppression. He placed the colonizing force—France—as the master, and the colonized country—Algeria—as the slave. Through the production of goods, the colonized can become self-conscious and autonomous beings, on the same level as their former colonizers. Modern colonization began to take on a different tactic, however. France colonized Algeria, for example, and then exported Algeria's riches—raw materials—for production elsewhere. This left, theoretically, the colonized with no means of production

of their own and no way to become self-conscious and self-determining. There are many criticisms of Hegel's Dialectic, as well as Fanon's interpretation of it. However, this Master-Slave Dialectic influenced organizations like the Front de Libération Nationale (National Liberation Front) an Algerian nationalist movement of which Fanon was an active member. Because there was not the option of production, the only other way to achieve power was through a violent struggle to the death against the colonizer, France. This led to the extremely bloody French-Algerian war, which stretched from 1954 to 1962.

On November 1, 1954, guerrillas from the Front de Libération Nationale (FLN) launched attacks on communication centers, police and military installations, and public utilities. From Cairo, the FLN broadcast a proclamation calling on Muslims in Algeria to join in a national struggle for the "restoration of the Algerian state, sovereign, democratic, and social, within the framework of the principles of Islam." The French minister of interior, socialist François Mitterrand, responded sharply that "the only possible negotiation is war." The next day, November 12, he declared: "One does not compromise when it comes to defending the internal peace of the nation, the unity and integrity of the Republic. The Algerian departments are part of the French Republic. They have been French for a long time, and they are irrevocably French... Between them and metropolitan France there can be no conceivable secession" (onwar.com).

The statements from both sides, while intended to be essentially fighting words, also expose a lot about the conflict itself: it was represented by both sides to be a religious conflict, Islam versus Western Christianity. Also it was depicted as cultural, imported French European values versus traditional African culture. Some philosophers

perceived the struggle as colonial, framing the war in terms of France claiming, subjugating, and attempting to keep a nation of second-class citizenry. And it was ended only when France retreated and granted Algeria its independence. This was not a happy ending for either side, however. Internal strife, high rates of casualties and the injured, and a lack of a strong, structured government led to years of struggle afterwards. French citizens living in Algeria, and newly made Algerian citizens who wished to remain French, moved back to France, where they were discriminated against, treated as unwelcome immigrants, and given their own derogatory term—*les pieds-noirs*, the black feet.

Many years later, Hegel's theories—including the Master-Slave dialectic—were criticized by French philosopher Michel Foucault. While not commenting directly on post-colonialism, Foucault objected to Hegel's teleological view of the world and his view and theories of violence and struggle. "The dialectic may at first sight seem to be the discourse of the universal and historical movement of contradiction and war, but I think that it does not in fact validate this discourse in philosophical terms," Foucault argues (58). "...Basically, the dialectic codifies struggle, war, and confrontations into a logic, or so-called logic, of contradiction; it turns them into the two-fold process of totalization and revelation of a rationality that is at once final but also basic, and in any case irreversible" (Foucault, 58). He concludes that the dialectic therefore relies upon and simultaneously reinforces a universal hierarchy of rights; it places the winner's rights and ideals at the top of this hierarchy. But there is not, Foucault argued, one way the world should be, or one standard the world is evolving toward. Any assertion that war is inevitable in any given situation is false.

Foucault directly influenced Edward Said, whose famous theory (and books) about Orientalism addressed the relationship between knowledge and power with regards to the perception of “the Orient” by the West. “I am not saying that Muslims have not attacked and injured Israelis and Westerners in the name of Islam. But I am saying that much of what one reads and sees in the media about Islam represents the aggression as coming from Islam because that is what ‘Islam’ is,” Said writes in his book on the subject, Covering Islam (Said, xxii). Islam as a religion has a special place within the conceptual framework of the West. The word seems to cover all the diverse customs, traditions, and history of the Muslim world into a vague, threatening malevolence, Said argues. This concept of Islam began with the first European explorations into the Middle East, and has been reinforced by since by political and religious propaganda (for instance, during the Crusades) and continues in the present day to be reinforced mainly by Western media coverage of the subject. “Instead of analysis and understanding as a result,” Said writes, “there can be for the most part only the crudest form of us-versus-them”(Said 8-9). This bias is present and prevalent in Western media and the West versus Islam has been an increasingly feared and predicted (some say inevitable) battle.

Samuel Huntington’s famous article “Clash of Civilizations” predicts just such a clash:

It is my hypothesis that the fundamental source of conflict in this new world will not be primarily ideological or primarily economic. The great divisions among humankind and the dominating source of conflict will be cultural. Nation states will remain the most powerful actors in world affairs, but the principal conflicts of global politics will occur between nations and groups of different civilizations. The clash of civilizations will dominate global politics. The fault lines between civilizations will be the battle lines of the future.

Huntington goes on to argue that conflict used to occur between princes—emperors, kings, essentially individual, powerful monarchs looking to expand their wealth and territories. These princes gave way to conflict between nations, beginning with the French Revolution. Then, after World War I, conflict evolved to a clash of ideologies—Democracy, Communism, Nazism fought it out on the global stage. (The Cold War, he argues, was between two superpowers that were not ‘nations’ in the traditional sense of the word but rather identified themselves ideologically.) After the Cold War, the West generally and the United States specifically emerged as the lone, hegemonic superpower. The latest modern conflict will now be, Huntington argues, between the West and the non-West.

Foucault’s critique of Hegel is also applicable here; Huntington’s theory is teleological. Other critics of the theory point out that Huntington has ignored entire continents in his analysis, like Africa, which is neither West nor non-West. But the most compelling critique is that as Huntington’s theory grows in popularity and notoriety, it becomes a self-fulfilling prophesy.

Historical Approaches to Immigration

These different and occasionally conflicting ideas on multiculturalism and assimilation have been used in various forms throughout modern French and Dutch history. The immigration policies of the two nations have reflected economic highs (post-World War II) and economic lows (oil crisis of 1973) as well as fluctuating public opinion.

Before World War II, the Netherlands was home to very few immigrants or people of non-Dutch heritage. The Dutch had instead been concentrating on their colonies abroad—Indonesia, Surinam (South America), and the Dutch West Indies and Aruba. There was relatively little industrial development in the Netherlands itself and so few job opportunities for immigrants and little need to import workers. Post-World War II, the Netherlands received two significant groups of immigrants from Indonesia (which gained its independence in 1949): the Indo-Dutch, who were, as the name implies, people of mixed Indonesian and Dutch heritage. They were treated as expatriates. The second group was the Moluccans, former native members of the Dutch colonial army who were by contrast considered temporary residents, segregated in isolated hut camps and entirely dependent on welfare and social assistance programs (Ireland, 117). Still, there was little need to recruit labor. Accordingly, while the Dutch immigrant population remained small over the next several decades—less than five percent—a large majority of the immigrants the Netherlands did have were not European: Turks made up over a quarter of their immigrant population (the Dutch have been trading with the Middle East, specifically the Ottoman Empire, since the 1500s) while Moroccans comprise more than a fifth. The rest of the immigrant population was primarily West Indian or Aruban (Ireland, 118).

From 1954 Dutch nationality law recognized only one form of Dutch citizenship. The Dutch government promoted immigration (aimed at its ethnic minorities) to Australia, Canada and New Zealand. Surinam was encouraged to become an independent state in large part to stem the tide of post-war migrants from the country (Geddes, 105).

Despite traditional Dutch attitudes of non-violence, in 1962 immigration violence erupted in the eastern textile manufacturing towns of Enschede, Hengelo and Almelo

(Geddes, 105). Unions expressed fears that immigrants and guest workers willing to work for lower pay would replace Dutch workers. These fears were not unfounded; there was widespread employment of illegal immigrants despite the rules specifying work permits. Illegal immigration became a matter for the Dutch courts, which tended to decide in favor of immigrants, reasoning that immigrants who had been in the country a certain length of time had sufficient basis for citizenship, despite their previous illegal status (Geddes, 105).

In response to the 1973 oil crisis, the Dutch government ended labor migration and guest worker programs. Work permits were no longer issued, and penalties for hiring illegal workers were introduced (Geddes, 106). While these policies stopped single immigrant workers, family migration—the right of citizens and immigrants already living in the Netherlands to bring over their families—continued. Allowing this type of migration to continue while prohibiting labor migration changed the immigrant demographics, increasing the numbers of female immigrants and adding higher numbers of young and elderly immigrants. The government tried to limit family migration by lowering the age of those considered children from 21 to 18, and specifying a minimum household income before one could bring a marriage partner into the country, but these attempts by the government to regulate family migration were difficult to implement and to enforce (Geddes, 106).

Between 1965 and 2001, the 1965 Aliens Act regulated Dutch asylum policy, distinguishing between ‘invited refugees,’ whose refugee status has already been confirmed by the United Nations Human Rights Commission, and asylum seekers who claimed asylum under the terms of the Geneva Convention. Movements formed to tighten

illegal immigration and crack down on false asylum claims, while other groups expressed growing concerns about the civil rights and basic social rights of illegal immigrants. The 2001 Alien Act addressed these concerns, seeking faster adjudication for asylum cases while linking Dutch asylum policy to EU structures that try to more evenly distribute immigration across EU countries (Geddes, 107).

Dutch political policy is traditionally consensus-based; Dutch “chatting culture” in which issues are thoroughly discussed and analyzed, prevails in Dutch politics. Laws that are passed are subject to scientific studies and critical analysis, and if serious doubts are cast on a law or policy, it is very likely to be changed (Ireland, 118). The first phase of Dutch policy regarding immigrants, during the 1960s and 1970s, placed emphasis on education, self-organization, and social work. They debated the merits of educating minorities in their native languages, and took pains to at least appear to relate culturally to their ethnic minorities. The policies aimed to create “mutual adaptation in a multicultural society with equal opportunities for Dutch people and ethnic minorities.” Special provisions akin to affirmative action policies in the United States were implemented (Engbersen, 62).

Criticized for isolating minority populations, these policies of integration-while-preserving-cultural/ethnic-identity gave way to an emphasis on reducing social disadvantages during the 1980s and 1990s. Policies focused on ensuring equal opportunities in social and employment sectors. Affirmative action programs were no longer considered justifiable unless they reduced the socio-economic disadvantages of minorities, especially minority unemployment and dependence on welfare.

Halfway through the 1990s, the term ‘citizenship’ became the new buzzword. The phrase ‘minority policy’ was replaced by a more universal ‘integration policy.’ Minorities were encouraged to become active citizens, and the social obligations of citizenship were stressed. The Dutch government made courses in Dutch language and culture obligatory for large numbers of minorities, especially those who were dependent on welfare (Engbersen, 63).

In 1998, one in six people in the Netherlands belonged to an ethnic group (defined as having been born or having at least one parent who was born outside of the Netherlands); but until 1998, the government had not acknowledged the Netherlands as a country of immigration. It was not because no one had noticed—one in six is roughly the proportion of ethnic minorities in the United States (Geddes, 104). But the Netherlands, as with most European countries, is reluctant to define itself as a nation of immigration. Low birth rates across Europe have made immigration a statistical necessity for countries like the Netherlands, but are often glossed over as each state tries to retain unique historical and cultural characteristics in an attempt to remain different from its EU members and neighbors.

While the French government is known for stressing assimilation, as a country it has been encouraging immigration since the nineteenth century, when concerns about low French birthrate and population growth first surfaced. The 1889 nationality law, coming at the beginning of the French Revolution, gave French citizenship automatically to all children born in France to foreign-born parents when they came of age. A series of laws passed in 1927 gave first generation foreign-born easier access to French nationality (Geddes, 57). In 1945, the government passed a reformed nationality code that

overturned the Vichy regime's revocation of French citizenship to the French Jewish population. The reformed code set up a fairly open system of citizenship based both on birth in the country (*jus soli*) and blood/ethnic descent (*jus sanguinis*). Article 44 of the new code granted nationality to children of foreign-born parents who had lived in France for five or more continuous years; Article 23 granted automatic citizenship to people born in Algeria until it became an independent country (in 1962). In 1973 this automatic citizenship was extended to people born in Morocco and Tunisia, which were former French protectorates (Geddes, 58).

Economically, after World War II, two groups influenced French immigration policy: those who favored importing immigrant laborers to boost production, and those who favored encouraging the settlement of immigrant families with an emphasis on long-term settlement and assimilation. The first group won, in the sense that French immigration policy did not acquire an official, explicit ethnic hierarchy from most to least likely to assimilate. However, that meant that immigration officials had quite a lot of discretion in issuing work and residence permits. Permits issued to immigrants deemed more likely to assimilate—from other Catholic European countries like Italy, Spain and Portugal—increased while immigration from North African countries decreased (Geddes, 53).

As in the Netherlands, decolonization of French territories drastically increased the non-European immigrant community, particularly people from Maghreb. Until 1956 Morocco and Tunisia were French protectorates, as well. Most important politically were immigrants from Algeria, which until its independence in 1962 was considered part of France; Algerians had the right to enter and leave France at will. In the aftermath of the

Algerian War, Algerians who wished to remain French—called harkis—were allowed to move to France (Wihtol de Wenden, 70). In 1946 there were 22,000 Algerians living in France; in 1982 there were 805,000 (Geddes, 54).

Private groups rather than state authorities organized and recruited non-French labor immigration until the 1970s, filling the gaps left by the French government. The government's lack of oversight combined with a lack of penalties for illegal immigrants resulted in large numbers of migrant workers who moved to France before acquiring the necessary paperwork. Minister of State for Social Affairs, Jean Marie Jeanneney, in 1966, explained this tolerance: "Illegal immigration has its uses, for if we rigidly adhere to the regulations and international agreements we would perhaps be short of labor" (Geddes, 53). By the late 1960s, 90 percent of immigration paperwork and permits was processed inside France (Geddes, 53).

In 1974 the French government, in reaction to economic recession, suspended both labor and family immigration. The suspension didn't apply to European Community nationals migrating for the purpose of work, or to highly skilled workers who could secure access to the French labor market. (The EC, founded in 1957 and originally called the European Economic Community, was a precursor to the EU and had six original members: Italy, France, Luxemburg, Belgium, the Netherlands, and West Germany united under the Treaty of Rome.) In 1978 the suspension of family migration was ruled unconstitutional by the Council of State because it violated the constitutional right to family life (Geddes, 54).

This suspension created large numbers of illegal immigrants, people who a few years before could have entered France without papers and receive all the necessary legal

paperwork from inside the country. This trend continued, but the process of legalizing one's immigration status became much more difficult (Wihtol de Wenden, 70; Geddes, 54). This suspension also encouraged long-term settlement and, as in the Netherlands, changed the demographic composition of immigrants in France; there was an increase in female immigrants as laborers brought over their spouses, and an increase in younger and older immigrants as other family members (children, grandparents) moved to France. Immigrants concerned about when and if France would close its borders for good brought record numbers of family members to France. From 1975 to 1982, non-European immigrants outnumbered European immigrants, a majority of which were from Maghreb (Wihtol de Wenden, 70).

From the late 1960s onward, there was discussion in France in the public as well as in the government concerning which kinds of immigrants were most likely to assimilate. Europeans, especially Catholics, were considered better able to assimilate smoothly into French society than non-European, often Muslim immigrants. Non-European immigrants were characterized in a 1968 Economic and Social Council report as an "inassimilable island" (Geddes, 55). Although forcible deportations were rejected in 1980 by the French parliament, the Badinter Law of June 1983 gave the French police the right to stop people for ID checks based on the person's hair and skin color. Again, as in the Netherlands, there was also discussion about repatriation assistance (*l'aide au retour*) but the immigrants who utilized the programs were mostly from other European countries like Spain and Portugal (Geddes, 55).

During the early 1980s the French government emphasized freedom and civil rights of the immigrant population. But during the latter part of the decade the

immigration debate was taken up by far right parties like *Front National*, which rose to prominence with xenophobic and anti-immigrant platforms that played increasingly well with the public (Wihtol de Wenden, 70). While there is little to suggest that Muslim or African immigrants are any more or less assimilable than other religions or ethnicities, the public political debate focused on the African Muslim immigrants in France. Far right politicians suggested African Muslims were incapable of assimilating to French culture. Second-generation African immigrant activists claimed that they had the right to both equal rights and the right to be different (Wihtol de Wenden, 71).

Since 1985 Jean Marie Le Pen and his party *Front National* have been leading the crusade against those they believe “do not deserve to be French” (Wihtol de Wenden, 71). This anti-immigrant sentiment continues to be a popular one. During the last major Parliamentary elections in 2002, Le Pen’s party received nearly 20 percent of the vote in the primary (Murphy, 6 May 2002). The Jacobin values of secularism, formal equality, and an exclusive allegiance to the state put in place after the French Revolution still hold sway (Wihtol de Wenden, 73). The official motto of the French Republic is *liberté, égalité, fraternité*—liberty, equality, fraternity—a milder version of the most famous slogan of the French Revolution: *liberté, égalité, fraternité, ou la mort!* Liberty, equality, fraternity, or death!

The debate continues to this day. Currently the French minister of the interior Nicolas Sarkozy is proposing a new addition to French immigration law that would implement a points system based on how likely an immigrant was to assimilate, which both the Council of Churches of France and representatives from the Muslim community oppose (Van Eeckhout, 24 April 2006).

There are two main theories about why sovereign European countries would cede aspects of their sovereignty and control to a supranational institution like the EU. The “losing control” hypothesis contends that European countries, in an increasingly globalized and interdependent world, have been driven toward interdependence. That, no matter how incompatible they find national sovereignty with the EU, the development of a transnational society is forcing them to cooperate and cede sovereignty (Geddes, 127). It is true, the EU started out as the European Economic Community (later the European Community) allying for the purpose of trade.

The second theory, the “escape to Europe” hypothesis, posits that transnational cooperation has allowed member states to avoid the constraints of their individual domestic laws and political influences (Geddes, 127). It is true, the member states of the EU place EU laws, rights, freedoms above national ones, theoretically. And each additional member to the EU must adopt all EU legislation, which amounts to thousands of new laws and regulations for each prospective member.

In this second context, EU laws on immigration, migrations, and asylum can be helpful to individual states by shifting some of the control (and thus some of the burdens, dilemmas and blame) onto a multi-layered supranational organization. The EU can pursue policies like imposing limits on immigrant movement and freedoms while the governments of its member states (in agreement or not) do not shoulder the political repercussions or find themselves in the untenable position of proposing to violate the rights of their own immigrant constituencies.

The EU’s migration policy is based on the supranational right of EU citizens to free movement, which overrides national laws. The origins of this particular right can be

traced back to the Treaty of Rome, which established the original EEC/EC. The Treaty of Rome placed free movement of workers, services, goods and capital (called the Four Freedoms) at the heart of the new Community. These four freedoms were also a central idea of the European Common Market. Other freedoms sprang up to ensure that workers moving within the EC would have access to the same social entitlements: welfare, unemployment and retirement benefits, etc (Geddes, 130). Guest workers and immigrants without citizenship in one of the member states did not have these rights or benefits (with the exception of immigrants from the European Economic Area such as Norway and Iceland).

Until the 1990s, EU policies of migration and movement between member states did not cover related issues of immigration, citizenship, and asylum. Since the mid 1970s member states had cooperated internal security measures like counter-terrorism (the Trevi group) in which issues of immigration could be discussed (Geddes, 130). There were, however, a number of informal agreements between certain member states concerning immigration. The Schengen Agreement (1985), originally between France, Germany, and the Benelux countries—Belgium, the Netherlands, and Luxemburg—allowed members to pursue aggressive economic and market integration while maintaining strict immigration and asylum policies. In 1999 the Schengen Agreement was incorporated into the EU formal structure following the ratification of the Amsterdam Treaty (Geddes, 132). While the acknowledgement of asylum and immigration as issues that needed to be dealt with formally by the EU was a big step, the Treaty of Amsterdam did not create clear common guidelines for immigration policies or affect the member states' day-to-day process of issuing visas, asylum, or citizenship. Britain, Ireland, and Denmark opted out of Title IV

(the title dealing with free movement, immigration and asylum) of the Amsterdam Treaty with the option of opting back on a case-by-case basis (Geddes, 137).

Recent Immigration Debate and Law

France as a country rewards and encourages assimilation, while the Netherlands encourages multiculturalism. Why do both countries with such very different ideas about how to address immigration issues have the same growing racial divides and immigrant violence? The violence and unrest is not identical in both countries, but it is—in its current form—a recent phenomenon. This surge in immigrant unrest cannot be explained by France’s strict assimilation requirements, because the same thing is happening in the Netherlands, where the government encourages expressions of racial and ethnic diversity and multiculturalism. This relatively sudden unrest cannot be explained by a unified transnational movement of any sort, because the violence in the Netherlands and the violence in France are different: In France the violence is perpetrated by groups, usually in the form of riots. Cars are burned, policemen are shot, windows are smashed. In the Netherlands, the violence is individual and personal. Dutch politician Pim Fortyyn was shot six times in the head. Filmmaker Theo van Gogh was shot and repeatedly stabbed to death as he bicycled to work. In both cases, the attackers acted individually.

A study in 2000 of the Dutch criminal justice system found that 33 percent of all criminal suspects are foreign-born, as are 55 percent of prison inmates (Dreher, 2002). And an astonishing 63 percent of those convicted of homicide are immigrants — mostly Moroccans, Antilleans, and sub-Saharan Africans. “The reason always given to explain

these statistics is that they live in deprived circumstances,” said criminologist Chris Rutenfrans of the study. “But other minorities are similarly deprived, and they aren't criminals” (Dreher, 2002).

Some political thinkers argue that one can point to a transnational movement—Islam. But that is a simplistic and intolerant explanation that does not address the myriad issues at play in the different countries. Fortyun was killed by an animal rights activist (Dreher, 2002), and the French riots were, according to rioters interviewed, not inspired by Islam or Islamic issues.

Muslim immigrants in the EU feel that the governments are treating them as second-class citizens. “If you have black hair, it is really difficult to find a job,” said Muhammad Elzjahim, a 22-year-old construction worker of Palestinian descent whose parents moved to Denmark when he was two years old. He said he had studied dentistry for three and a half years only to find that “it was for nothing, because I couldn't find a job in my field” (Cowell, 8 Feb. 2006). Rioters in the French neighborhood of Clichy-sous-Bois cited continued police harassment as a reason for the angry youth population. “If you're treated like a dog, you react like a dog,” said a Mr. Diallo of Clichy-sous-Bois, whose parents came to France from Mali decades ago (Smith, 7 Nov. 2005).

The anger and resentment is present in the non-immigrant residents too, but instead of jobs or respect, their focus seems to be a fear of Islam. “In America, few people fear that they will have to live according to the norms of Islam,” an editorial in the Dutch newspaper read. “In European countries, with a large or growing Muslim minority, there is a real fear that behind the demand for respect hides another agenda: the threat that

everyone must adjust to the rules of Islam” (Cowell, 8 Feb 2006). In Paris, the newspaper *France Soir* declared, “No religious dogma can impose its view on a democratic and secular society,” and was the first newspaper in the country to print the twelve Danish cartoons mocking Muhammad (Cowell, 2 Feb. 2006). Members of the public agree. “The radicals don't want an agreement; they don't want the round table,” said Rainer Mion, a 44-year-old German insurance agent in Berlin. “What they want is to spread their Islamic beliefs all over the world” (Cowell, 8 Feb. 2006). This thought is echoed in newspapers across the EU. “Islam is protected by an invisible blasphemy law,” said Jasper Gerard, a columnist for the British newspaper, *The Sunday Times*; “it is called fear” (Cowell, 8 Feb. 2006).

The difference between the fears and concerns of the immigrants and the non-immigrants is important. The immigrants resent the exclusion and suspicion they feel subjected to, and the non-immigrants resent the perceived deterioration of their own religious and cultural values. It is not a completely idle fear—there are roughly 20 million Muslims in Europe today, and by the year 2050 Muslims in Europe are expected to outnumber non-Muslims. For most European countries, founded on traditionally Christian values, Islam is an unknown factor. The surge in Islamic terrorism and attacks in Europe such as the London subway bombings and the Madrid train bombing keep the subject of Islamic extremists in the news and at the forefront of public debate. Further, media representations of the Islamic world often play into these fears.

The growth in immigrants of all religions in European countries has been followed by the growth in popularity of far-right parties that often have anti-immigration

stances. In Great Britain's last major elections, immigration was at the forefront. "Are you thinking what I'm thinking?" proclaimed ads on buses and billboards. "It's not racist to enforce limits on immigration." In France, "*L'islamisation de la France sera, selon Philippe de Villiers, au centre de la campagne de l'élection présidentielle de 2007,*" reports *Le Monde* (Chombeau, 6 Feb. 2006). The islamisation of France will be, according to Philippe de Villiers, at the center of the 2007 presidential election campaign. De Villiers is the president of one of France's newest far-right parties, Le Mouvement pour la France (MPF). The Front Nationale, another far-right French party led by Jean Marie Le Pen, won an unprecedented six million votes in France's last primary election, almost 20 percent (Murphy, 6 May 2002).

The governments of France and the Netherlands are not unaware of this growing racial divide, and it is especially worrying that citizens moved from politics to individual action. In Paris, the police are cracking down on a soup kitchen run by a secretary named Odile Bonnivard in the name of racial harmony. In December of 2005, after the November riots in Clichy-sous-Bois, the French police began trying to prevent the soup kitchen from operating, citing the "discriminatory nature of the soup" (Smith, 28 Feb. 2006). What makes Bonnivard's action such a public statement of exclusion—and a possible trend, as people in Nice and Strasbourg have begun similar soup kitchens—is that the soup deliberately contains pork (Smith, 28 Feb. 2006). At first, Bonnivard used pork because it was a cheap ingredient for a hearty French soup. But when she realized the political and religious significance of pork, she said it quickly became the focus of her new movement—and her new slogan: "Help our own before others." The others, explained Bonnivard, are non-European immigrants who come into France and take up

governmental money and resources that ought to be used to help native French citizens first. “Other communities don't hesitate to help their own, so why can't we?” she asked, noting that there are kosher soup kitchens for Jewish disadvantaged, and Islamic charities that serve *halal* food (Smith, 28 Feb. 2006).

In the Netherlands, a December 2003 study reported that by 2017 there would be in Rotterdam a non-native majority population. That same month, a huge racial controversy sprang from the discussion of city building codes and a proposed alteration of the Rotterdam skyline. A new mosque—at 164 feet high, the largest proposed in Europe—became the center of a deeper controversy. Cities leaders began calling for a design that was “less Arabic” (Ehrlich, Dec. 2003). “It is as if the Netherlands has realized that they are a multicultural society, and are beginning to say to themselves – ‘Well, we always said we wanted this, but now we have second thoughts,’ ” said Jan Niessen, director of the independent Migration Policy Group in Brussels, expressing a popular sentiment in the Netherlands. “The time of formulating nice policies about multiculturalism is over” (Ehrlich, Dec. 2003).

Unfortunately, when it comes down to actually integrating multiculturalism into everyday life, many citizens of the EU balk at any major changes directed at their traditional cultures. The Netherlands had a reputation as one of the most tolerant countries in Europe. Dutch citizenship, until recently, was relatively easy to attain. Largely in response to the recent violence seen as coming from foreigners, rightly or wrongly (early reports of Pim Fortuyn's murder blamed Islamic radicals; his murderer was actually an animal rights activist) and a growing feeling that their culture is under attack, Dutch politicians have moved to tighten citizenship and immigration rules.

In a speech in Parliament during the debate about whether or not to force those applying for Dutch citizenship to renounce their original nationality, Immigration Minister Rita Verdonk indicated she found it difficult to express a positive attitude towards Islam. She pointed out that many innocent people have suffered in the name of Islam (Expatica, 2004). However, she also proposed a special Muslim-government contact group to break up the negative feelings regarding Islam. She is a perfect example of the current Dutch citizen's inner conflict: She has a negative view of Islam, sees it harmful to many people, but hopes that a government-sponsored outreach program might help. Really, the hope is that the governmental program would "educate" the Muslim community about multiculturalism in a way that makes them more sensitive to Dutch culture, rather than the other way around. And why not? This method has worked for the Dutch in the past, although with different groups in smaller numbers; the Arubans, Indonesians, West Indians, and Indo-Dutch from the Netherlands' colonial past have been neatly assimilated this way (Ireland, 118). (Of course this tactic was notably absent in Dutch dealings with another colonial group, the Moluccans, who were restricted to isolated camps and discouraged from associating with Dutch citizens.)

Last February, Minister Verdonk unveiled a new *inburgeringsexamen*, an integration exam. Among the questions are those that test understanding of Dutch culture: Does a car have two or four wheels? Is it OK to sunbathe topless on the North Sea beaches along the Dutch coast? (Expatica, 2005). A video accompanying the exam material displays images of gay marriages. Although unsaid, this integration exam is aimed at Middle Eastern immigrants. There are exceptions in place for citizens from other EU countries and from the European Economic Area (which include all EU

members as well as Norway, Iceland and Liechtenstein) as well as Switzerland, the US, Canada, Australia, New Zealand and Japan (Expatia, 2005).

This idea of forced assimilation is relatively new to the Dutch. The French, on the other hand, have always stressed immediate assimilation. A recent debate revolving around Islamic headscarves in schools illustrates this particularly well. *Laïcité* is a founding principle of French education. It does not have a direct translation in English, but loosely refers to the separation of public institutions, particularly education, and religion. The idea is that, in school, children should be able to approach all subjects without undue religious influence. While the French system cannot actually eliminate religious influence, it can ban the physical symbols. The famous “headscarf ban” in France was signed into law on March 15, 2004 by President Jacques Chirac after a 276-20 vote in the French Senate, and it came into effect at the beginning of the next school year—September 2004 (Schleicher, 8 Mar. 2004). The full title of the law is *Loi no. 2004-228 du 15 mars 2004 encadrant, en application du principe de laïcité, le port de signes ou de tenues manifestant une appartenance religieuse dans les écoles, collèges et lycées publics*. It appeals directly to the concept of *laïcité* as the main justification for the law, a concept many French citizens—and their politicians—feel is fundamental for French culture.

In the Netherlands, Immigration Minister Verdonk said the Cabinet and Parliament did not intend to impose a ban on Islamic veils similar to the French ban on the wearing of religious symbols, but admitted that the government is devising ways to intervene when there is an indication of force involved in the wearing of a veil (Expatia, 2005).

Officials in both countries fear growing Islamic fundamentalism. “We must not consider that this situation is minor,” said French Prime Minister Jean-Pierre Raffarin when the law came into effect. “Everyone has the right to express his faith, on condition that inside the schools of the republic, he respects the laws of the republic” (Schleicher, 8 Mar. 2004). Some politicians put the matter even more bluntly: “Some people have to realize that they’re in France and not in Mecca,” said Jacques Myard, a National Assembly member. “And I tell you something, that kind of people only respect people who are firm” (Schleicher, 8 Mar. 2004). *That kind of people*,—Muslims—naturally objected to this statement, which did not help to calm the debate.

The ban in France affects not only Islamic headscarves, but Jewish skullcaps, large Christian crosses (but not small ones), and Sikh turbans as well (although some in the Sikh community argue that turbans are a cultural, not religious, symbol.) While the majority of the French public supports the law, many French Muslims are enraged. They argue that the scarf is a religious obligation, and/or deny that girls are forced to wear them. Many Muslim schoolgirls insist publicly that they choose to wear the headscarf. Interior Minister Nicolas Sarkozy—himself a son of French immigrants, from Hungary—expressed fears that the law might disenfranchise French Muslims, or push students towards private Islamic schools and closer to Islamic radicalism (Schleicher, 8 Mar. 2004). Laurent Levy’s two teenage daughters were expelled for wearing headscarves, and are now home schooled. “When they went to a public school, they had friends of all ethnic origins and all religions—that’s what national unity is all about,” she told the *Toronto Star*. “Today, they exclusively meet with friends who come to visit at home, and the large majority of those are practicing Muslims” (Schleicher, 8 Mar. 2004). This seems

to be making the point of both sides—that national unity is important, and that so is diversity. But there is sharp disagreement over whether or not the law helps or hinders diversity and national unity.

Part of the problem is miscommunication between the two governments and their mostly Muslim immigrant populations. Islam, like Christianity, does not have one set of common beliefs or traditions. It does not have one acknowledged leader, who speaks for Muslims everywhere. It is not centered in one country, or one region, or one race. But due to media stereotypes and Islamic fundamentalists that shape cultural perceptions of Islam, it is often perceived that way. “I may be a Muslim, but I can tell the difference between a newspaper and a people, a country and a principle,” wrote Karim Raslan in an opinion piece titled “The Islam Gap” (15 Feb. 2006). “I am reminded of how uncomfortable I felt last year when traveling through Saudi Arabia, surrounded by a people I found disquietingly alien. For all we share as Muslims, we Southeast Asians don't really know what it's like to inhabit the cultures or politics of the Middle East” (Raslan, 15 Feb. 2006). Raslan echoes one of Said's main points: Muslims are not a homogenous group. Unfortunately a small group of Muslims—Islamic extremists—is portrayed by the media as representative of the whole.

For the Dutch especially, who have a clause in their constitution that bans “discrimination”—ruled by the High Court to include speech too critical of women and minorities—this more openly critical view of Islam in the media and politics is radical (Dreher, 2002). Andreas Kinneging, a legal philosopher and key figure in the Dutch conservative movement, explains how anti-immigration platforms took so long to

become a national issue. “In the wake of the transformation of our big cities [by immigration] has come a lot of guns, violence, drugs, trading in women, and dirty streets. The political, intellectual, and journalistic elite who are in favor of this immigration do not live in these urban neighborhoods” (Dreher, 2002). But much of the Dutch voting public does, and politicians are finally responding.

Immigration has become a perennially hot topic in the Netherlands, especially as elections approach. In a surprise announcement May 15, 2006, Dutch minister of immigration Rita Verdonk threatened Ayaan Hirsi Ali, a writer who worked on film projects with Theo van Gogh and a current member of Dutch Parliament, with deportation. A Somali born Muslim who writes and speaks against Islamic violence against women and who has called for immigrants in the Netherlands to assimilate or leave, Hirsi Ali has been a political ally of Verdonk’s in the past. Both have taken tough stands on immigration. (Simons, 18 May 2006). Hirsi Ali first entered the public debate on immigration alongside her friend Pim Fortuyn, who warned that liberal traditions and lifestyles were being threatened by the “backwards culture” of Islam (Watts, 16 May 2006). Hirsi Ali received widespread public sympathy and state protection after van Gogh’s murder in 2002 (a note found with van Gogh’s body promised that Hirsi Ali, who had collaborated with van Gogh on a film depicting Islamic violence against women, would be next).

Hirsi Ali became a Dutch citizen 14 years ago, after fleeing an arranged marriage in Somalia. She openly admits that she changed her last name and date of birth on arriving in the Netherlands, “in case my father or my brother or my husband looked for

me with bad intentions,” she explained in a recent New York Times article (Simons, 16 May 2006). “I’m now being picked on for lying, but I have admitted this for years.” She also remarked that the move to take away her citizenship, leaving her stateless, was an attempt to silence her. “I have been fully committed to my work in Parliament, and I have taken many risks,” she said. “This will make others think harder before they speak out.” (Simons, 16 May 2006).

Minister Verdonk, who is a member of the conservative VVD party, has taken an increasingly hard line on immigration as elections creep closer. Known in parliament as “Iron Rita” for her tough stance on immigration, Verdonk has in the past been closely allied with Hirsi Ali, who is also a member of the VVD party (Simons, 18 May 2006). Verdonk hopes to be the VVD’s candidate for prime minister in the 2007 elections. “Laws and rules should be valid for everyone,” she was quoted as saying in response to the deportation of Hirsi Ali. (Watts, 16 May 2006).

While Dutch newspapers generally support Hirsi Ali’s right to stay in the country, the Dutch public in a recent opinion poll (taken on May 16, 2006) are almost evenly divided (Simons, 18 May 2006). Hirsi Ali’s Dutch neighbors have become tired of the hazards of Hirsi Ali’s chosen campaign against Islamic violence as well; in April 2006 neighbors of Hirsi Ali won a lawsuit complaining that her presence in the apartment building exposed them to risk. (No wonder so many Dutch people had failed to resist the Nazis during the war, commented Hirsi Ali.) (Burma, 19 May 2006).

This political brouhaha is, I believe, emblematic of a larger change in the way the Dutch view their country, their culture, and their growing immigrant population. It would

be easy to cast Verdonk (stern, middle aged former deputy prison warden) as the villain, and Hirsi Ali (vibrant, graceful defender of Islamic women's rights) as the beleaguered hero. Or, Verdonk as the intolerant Dutch politician and Hirsi Ali as the spirited immigrant activist. But in fact it would be more accurate to place Verdonk and Hirsi Ali not as polar opposites, but as two sides of the same coin. Post 9/11, and after a string of violent deaths rightly or wrongly blamed on Islamic terrorists, the famed and favored Dutch policies of multiculturalism began to give way to stricter immigration laws and a push for assimilation. Tolerance gave way to intolerance; the Dutch government moved from sponsoring programs that allowed children to learn in their native language in public schools (usually Arabic, Berber or Turkish) to a law proposed by Verdonk that stated only Dutch should be spoken in the streets (Buruma, 19 May 2006).

Hirsi Ali rose to prominence as a conservative thinker and activist during this time; along with other former leftists she was convinced that multiculturalism had failed and that a tough stance was the only way to deal with "the Muslim challenge," was a tougher stance on immigration (Buruma, 19 May 2006). But Hirsi Ali herself was a beneficiary of Dutch multiculturalism. She was coached by members of a Dutch refugee organization on how to present her story in a light most likely to gain sympathy and asylum. Her current plight is a result of the Netherland's former multiculturalist approach to immigration clashing with the new, less flexible program she herself helped create. She agrees with Verdonk in principle, but not when her own citizenship is in question. But Verdonk is right—although not kind—in revoking her citizenship. Verdonk has deported or refused asylum to vulnerable refugees from Syria and the Congo, as well as an entire Iraqi family that human rights experts warned would be in great danger if they

returned (Buruma, 19 May 2006). To back down now would undermine new immigration policies, never mind the example it would set for new Dutch immigrants.

In contrast the government in France is shifting uneasily from a policy of strict assimilation to one of tentative multiculturalism. French officials worry that assimilation ostracizes and disenfranchises Muslim youths, who may then gravitate toward radical Islam. But assimilation is still a much more prevalent force than multiculturalism, and if the French government attempts to change this, it will have to be done slowly and carefully. Few bureaucrats are convinced, however, that multiculturalism is the answer.

How can this problem of miscommunication between government and immigrants, misrepresentation of immigrants and Islam in the media, and mistrust of traditional residents and non-assimilating immigrants be resolved? The Dutch approach leans heavily on commissions and councils to promote understanding, although that is changing. These, of course, rely on representatives from Muslim communities, which while helpful, cannot speak for all immigrants or all Muslims. And it doesn't seem to have had much effect on the racial tensions in the Netherlands. The French favor official neutrality and color-blindness, which also is not working. Some "color-blind" policies like the headscarf ban, while ostensibly banning all religious symbols, affect one group disproportionately. This adds to the racial tension and immigrant unrest, and leads to the spectacular failure of the policy.

The racial tensions in both countries are more complicated than just miscommunications between governments and immigrants, or controversial new governmental policies. Immigrants in the EU are not assimilating like they used to;

immigrant populations are not altering their cultural practices to fit within accepted standards of the country they move to. Some of this may be due to different conceptions of citizenship expected by state governments and EU policies. Some of this may be in response to far-right anti-Muslim and anti-immigration policies. Some of this may be due to the sheer number of new immigrants.

As larger numbers of people from outside of the EU move into EU countries, a growing separatism among immigrants, encouraged by a growing xenophobia from far-right parties in EU countries, creates more cultural divide. The power held by numbers and voting blocs in European countries, among them France and the Netherlands, increases the potential power of immigrants to influence government policy. This threat of an imminent immigrant majority in France and the Netherlands increases the tension and xenophobia among its residents. Added to physical segregation most apparent in the larger cities like Paris and Rotterdam, and an increase in both the rate of violence and the media reporting of it, the *perception* of us-versus-them Said warns against supplants more academic analysis of the cultural divide. Popular theories of culture clash, like Samuel Huntington's highly popular "Clash of Civilizations" become self-fulfilling prophecies.

Bibliography

- Baubock, Rainier. "Public Culture in Societies of Immigration." Sackmann, Peters and Faist, 37-58.
- Baudrillard, Jean. "Holy Europe." *New Left Review* No. 33, May-June 2005. [<http://www.newleftreview.net/NLR26702.shtml>].
- Brians, Paul. "Post-colonial Literature: Problems with the Term." *World Literature Index Website* 7 August 1998. 5 January 2006. [<http://www.wsu.edu:8080/~brians/anglophone/postcolonial.html>].
- Calvès, Gwénaële. "Color-Blindness at a Crossroads in Contemporary France." Race in France: Interdisciplinary Perspectives on the Politics of Difference. Ed. Herrick Chapman and Laura L. Frader. New York: Berghahn Books, 2004. 219-226.
- "Charter of Fundamental Rights of the European Union." *Official Journal of the European Communities* 21 April 2005. [http://europa.eu.int/comm/external_relations/human_rights/intro/].
- Conover, Pamela Johnston, Ivor M. Crewe, and Donald D. Searing. "The Nature of Citizenship in the United States and Great Britain: Empirical Comments on Theoretical Themes." *Journal of Politics* 53. 3 (1991): 800-832.
- "Declaration of the European Union on the Occasion of the 50th Anniversary of the Universal Declaration of Human Rights," chapter B article II *Europa: European Union External Relations* 17 April 2005. [http://europa.eu.int/comm/external_relations/human_rights/intro/].
- Dreher, Rod. "On Tiptoe Through the Tulips." *National Review Online*, July 2002 issue. [<http://www.nationalreview.com/29july02/dreher072902.asp>]
- Engbersen, Godfried. "Spheres of Integration: Towards a Differentiated and Reflexive Ethnic Minority Policy." Sackmann, Peters and Faist, 59-76.
- Eronen, Jarmo. "Cultural Regions and Integration in Europe." *Helsinki School of Economics, 'New Europe 2020' conference* August 2004. 10 February 2006. [<http://www.tukkk.fi/pei/NewEurope/SessionC3/Eronen.pdf>].
- Foucault, Michel. Society Must Be Defended: Lectures at the Collège De France 1975-1976. New York: Picador Press, 1997.

- Geddes, Andrew. The Politics of Migration and Immigration in Europe. London: Sage Publications, 2003.
- Gutmann, Amy ed. Multiculturalism and "The Politics of Recognition." Princeton: Princeton University Press, 1992.
- Huntington, Samuel. "The Clash of Civilizations." *Foreign Affairs* 72. 3 (1993): 22-28
- Ireland, Patrick. Becoming Europe: Immigration, Integration, and the Welfare State. Pittsburgh: University of Pittsburgh Press, 2004.
- Leiken, Robert S. "Europe's Angry Muslims." *Foreign Affairs*, July/August 2005. [http://www.cfr.org/publication/8218/europes_angry_muslims.html?breadcrumb=default].
- Lubeck, Paul. "The Challenge of Islamic Networks and Citizenship Claims: Europe's Painful Adjustment to Globalization." Muslim Europe or Euro-Islam: Politics, Culture, and Citizenship in the Age of Globalization. Ed. Nezar AlSayyad and Manuel Castells. New York:Lexington Books, 2002. 69-90.
- Magala, Slawomir. "Cross-Cultural Studies in the EU." *Journal of Economic Literature*, March 2002. [<https://ep.eur.nl/bitstream/1765/185/1/erimrs20020313155756.pdf>].
- Moreira, Juan M. Delgado. "Cohesion and Citizenship in EU Cultural Policy." *Journal of Common Market Studies* 38. 3 (2000): 449. [<http://www.blackwell-synergy.com/links/doi/10.1111/1468-5965.00230>].
- Murray, Ian. "Wish Fulfillment." *National Review Online* June 2003 issue. [<http://www.nationalreview.com/comment/comment-murray062303.asp>].
- "Muslim Population Statistics." *Canadian Society of Muslims Website*. Feb. 28 2006. [<http://muslim-canada.org/muslimstats.html>].
- Nadeau, Jean-Benoit and Julie Barlow. Sixty Million Frenchmen Can't Be Wrong: Why We Love France but Not the French. Naperville, Illinois: Sourcebooks, Inc. 2003.
- O'Sullivan, John. "The Islamic Republic of Holland." *National Review* 57. 13 (2005): 37-8.
- Peters, Bernhard. "Collective Identity, Cultural Difference and the Developmental Trajectories of Immigrant Groups." Sackmann, Peters and Faist, 13-36.
- Roche, Maurice. "Citizenship and Modernity." *British Journal of Sociology* 46. 4 (1995): 715-33.

Sackmann, Rosemarie, Bernhard Peters and Thomas Faist, eds. Identity and Integration: Migrants in Western Europe. Burlington: Ashgate Publishing, 2003.

Said, Edward. Covering Islam: How the Media and the Experts Determine How We See the Rest of the World. New York: Random House Vintage Books, 1997.

Steinhart, Eric. "The Master Slave Dialectic." *William Patterson University Philosophy Department website*, 1998. 12 March 2006.
[<http://www.wpunj.edu/cohss/philosophy/courses/hegel/MASLAVE.HTM>].

Taylor, Charles. "The Politics of Recognition." Gutmann, 25-74.

Wihtol de Wenden, Catherine. "Assimilation and Struggle." *Georgetown Journal of International Affairs* 4. 2 (2003): 69-75.

Baker, Daniel P. Letter. *New York Times*, 6 February 2006.

BBC News. "Muslims in Europe: Country Guide." 23 December 2005.
[<http://news.bbc.co.uk/2/hi/europe/4385768.stm>].

Buruma, Ian. "Hard Luck for a Hard-Liner." *New York Times*, 19 May 2006.

Chombeau, Christiane. "Philippe de Villiers s'en prend à l'islamisation rampante." *Le Monde*, 6 February 2006.

Conlan, Tara. "BBC Warns Staff Over 'Terrorism.'" *The Guardian*, 16 December 2005.

Cowell, Alan. "What Britain Can Tell France About Rioters." *New York Times*, 20 November 2005.

Cowell, Alan. "Muslim Cleric Accused in London Court of Inciting Racial Hatred of Jews." *New York Times*, 12 January 2006.

Cowell, Alan. "More European Papers Print Cartoons of Mohammad, Fueling Dispute With Muslims." *New York Times*, 2 February 2006.

Fattah, Hassan. "Caricature of Mohammed Leads to Boycott of Danish Goods." *New York Times*, 31 January 2006.

Ford, Richard. A Question of Britishness. *The Times*, 1 November 2005.

- Freidman, Thomas L. "Empty Pockets, Empty Minds." *New York Times*, 22 February 2006.
- Kimmelman, Michael. "A Startling New Lesson in the Power of Imagery." *New York Times*, 8 February 2006.
- Murphy, Clare. "France Chastened By Election Crisis." *BBC News Online*, 6 May 2002.
- Raslan, Karim. "The Islam Gap." *New York Times*, 15 February 2006.
- Rothstein, Edward. "Refining the Tests That Confer Citizenship." *New York Times*, 23 January 2006.
- Sciolino, Elaine. "Immigrant Polygamy is a Factor in French Unrest, a Gaullist Says." *New York Times*, 18 November 2005.
- Schleicher, Annie. "French Government Bans Religious Clothing in Schools." *PBS NewsHour Online*, 8 March 2004.
- Simons, Marlise. "A Critic of Muslim Intolerance Faces Loss of Dutch Citizenship." *New York Times*, 16 May 2006.
- Simons, Marlise. "Muslim's Loss of Dutch Citizenship Stirs Storm." *New York Times*, 18 May 2006.
- Smith, Craig S. "10 Police Officers Shot as Riots Worsen in French Cities." *New York Times*, 7 November 2005.
- Smith, Craig S. "Poor and Muslim? Jewish? Soup Kitchen is Not for You." *New York Times*, 28 February 2006.
- Van Eeckhout, Laetitia. "Les Eglises chrétiennes s'inquiètent du contenu du projet de loi sur l'immigration." *Le Monde*, 24 April 2006.
- Watts, Nicholas. "MP in Immigration Row to Leave Netherlands." *The Guardian*, 16 May 2006.
- Whitlock, Craig. "For Public Figures in the Netherlands, Terror Becomes Personal Concern." *Washington Post Foreign Service*, 11 November 2005.