

Multicultural Sweden, assimilationist France: how and why national identity narratives evolve

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Article abstract

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'Cultural diversity, Multilingualism and Ethnic minorities in Sweden'

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Abstract: This paper examines the differences between Sweden's and France's immigration policies the first one being multicultural, the other assimilationist. The hypothesis that will be developed is that such differences can be explained by the political cultures of each country. National identities are based on socially constructed narratives whose contents somehow determine immigration policies basic contents. But a closer examination of Swedish and French immigration policies shows that they are not purely multicultural or assimilationist. Some adaptations have been made in practice, and the two models tend to become closer.

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Multicultural Sweden, assimilationist France: how and why national identity narratives evolve

Nathalie Blanc-Noël¹

Cet article étudie les différences entre les politiques d'immigration suédoise et française, la politique suédoise étant basée sur le multiculturalisme et la politique française sur l'assimilationnisme. L'hypothèse développée est que l'explication de ces différences peuvent résider dans la culture politique de chaque pays. Les identités nationales sont fondées sur des récits socialement construits dont le contenu détermine les grandes orientations des politiques d'immigration. Mais un examen plus fin des politiques d'immigration suédoise et française révèle qu'elles ne relèvent pas d'un modèle pur de multiculturalisme ou d'assimilationnisme. Des adaptations ont été réalisées dans la pratique, et les deux modèles tendent à se rapprocher.

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Globalization, if we refer to Global history recent works², has been eternal in mankind history, but this was occulted by the nationalistic paradigm developed in the 19th Century. This "nationalistic methodology", as Ulrich Beck called it³, has accustomed us to thinking in terms of "national" identity and belonging, instead of mixity or hybridity, which would be more accurate to describe the anthropological reality of the majority of peoples living in this world⁴. Nevertheless, since the end of the Cold war, the speeding up of globalization has put national thinking into question. Nations are no more the only providers of identity. As Arjun Appadurai has shown it, multiple identities have developed all over the world, and the nation is becoming just another level of identification between local and global frames⁵...

As the pace of globalization accelerated, many countries, that had previously been self-confident on their identity and where the subject had seldom been a matter of thought, suddenly brought it on the public debate. The question of national identity was often linked to the question of immigration. It has often been the focal point of the national identity debate, even if national

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² Bayly, Christopher A. *The Birth of the Modern World*, Oxford, Blackwell, 2004.

Also : Clarke, Robert, *The Global Imperative*, Boulder, Westview Press, 1997.

³ Beck, Ulrich, *Qu'est-ce que le cosmopolitisme?*, Paris, Aubier, 2006.

⁴ Nederveen Pieterse, Jan, *Globalization and Culture*, Lanham, Rowman and Littlefield, 2004.

⁵ Appadurai, Arjun, *Après le colonialisme, les conséquences culturelles de la mondialisation*, Paris, Payot, 2001.

identities have been altered by other salient dimensions, such as the outcome of post-industrial society or the weakening of political ideologies... But among the different flows globalization is made of (flows of goods, capital, images...), flows of migrants often are the most concrete aspect of globalization experienced by ordinary citizens. In Europe especially, the recent speeding up of globalization has coincided with a growing immigration. In 2005, 21% of the world's immigrants lived in Europe and 8.6% of the European population is made of immigrants⁶. Europe is the place in the world that welcomes the greatest number of immigrants, and experts such as the Population Division of the United Nations predict that immigration flows will go on. They also underline the fact that Europe will need immigration in order to balance the ageing of its population⁷.

In most European countries, we can observe now that national identity narratives are very gradually put into question by immigration. What I will call here a "national identity narrative" is the official discourse, including symbolic elements, giving shape to national identity, by referring to historical episodes, characters, cultural elements and so on. In Europe, such discourses were usually fixed in the 19th Century and diffused – as they are today – by public schools, literature and fine arts, but also by the army, during conscription, as well as by the media, the political discourses and official ceremonials. National narratives are the basic, popular expression of nations as *imagined communities*, to refer to Benedict Anderson⁸. In some ways, national narratives have always been fictional. In the case of France, for instance, the narrative hides the fact that the country is made of a mosaic of ancient peoples that have been united by kings and wars. Whereas King François I tried to impose French as the official language in the 16th Century, it has not been talked by all the French... until the end of the 19th century, when a 3rd Republic leader, Jules Ferry, created a compulsory, public free school for all children... To further illustrate the artificial character of national narratives, one can refer to the book written by a French historian, Anne-Marie Thiesse, on the construction of national identities narratives in Europe from the end of the 18th Century⁹. She explores the times when European intellectuals (as the poet Geiger in Sweden or the Grimm brothers in Germany) intended to fix the national narratives of their countries, trying to discover the "grand ancestors" of their respective nations in the depths of peasant's culture, especially in popular tales and songs. In most cases, a choice had to be made

⁶ Jamet, Jean-François, "L'Union européenne et l'immigration", in *Questions d'Europe*, n°42, 2006.

⁷ Catherine Wihthol de Wenden, "Démographie, immigration, intégration", in *Questions d'Europe*, octobre 2008, Fondation Robert Schuman, www.robert-schuman.org. United Nations, *Replacement Migration : Is it a Solution to Declining and Ageing Population?* New York, ESA/P/WP.160, 2000.

⁸ Anderson, Benedict, *Imagined Communities*, London, Verso, 1983.

⁹ Thiesse, Anne-Marie, *La création des identités nationales, Europe XVIIIe-XXe siècle*, Paris, Seuil, Coll. Points, 2001.

among several “ancestors” that had been present on the territory over times... In 1795, a French historian, Volney, proposed to consider the Celts and in particular the Britons, as ancestors of the French... But Volney’s proposal failed, because those ancestors had been already chosen by England, which was at that time France’s traditional competitor¹⁰... And this is the reason why generations of French pupils – whether they were from metropolitan France or from the rest of the colonial empire – were told their ancestors were Gallics with blonde hair...

National narratives are social constructions. But if they are constructed, they can evolve, and be re-constructed in occasions when they do not fit reality any more, or when they do not have the capacity of gathering citizens any more. At the beginning of the 21st Century, the need to have national identities narratives evolve is pressing, because migrations induced problems that cannot be solved by social policies alone. In several European countries, phenomena such as urban bursts of violence, growing religious fundamentalism, and the rising of extremist, anti-immigration political parties have appeared. There are also demands from immigrants’ descendants, who claim to be recognized as ordinary citizens. Such phenomena express unease and dissatisfaction and a sense that there is a major problem left unsolved. Yet, no European country seems to have found an ideal solution. One can roughly say that there are, in Europe, two models of dealing with the integration of foreign populations : the first one is the multicultural model and its official recognition that a pluralism of cultures form the national identity. This model was adopted by United Kingdom, Germany, the Netherlands and Sweden. The second model is the integrative or assimilative one, where foreign populations are encouraged to integrate a social contract and its values. It is the model prevailing in France, Switzerland or Denmark.

To understand how identity narratives can adapt to the changing nature of a country’s population in a globalized environment, it may be interesting to compare individual European countries. The cases of Sweden and France are particularly interesting, because they seem to be completely opposite on many aspects. Sweden never was a colonial country and experienced a very late immigration. Yet she adapted her narrative to proclaim herself a multicultural country. On the contrary, France, that was the second largest colonial empire in the world, and where immigration is ancient, sticks to a republican, equalitarian narrative, refusing to take cultural differences into account. It is necessary to understand how Sweden, in spite of her relative lack of experience with immigration questions can deal with the change in its population and how the second largest immigration country in Europe, France, seems hardly able to do so. But we will also ask if this way of putting things is not too simple. Is Sweden a true multiculturalist, and France a true assimilationist, or do they tend to adopt a converging pattern?

¹⁰ *Ibid.* p.50.

This paper will first examine data on immigration in the two countries. Then it will examine their national identity narratives and the possibilities they offer to adapt to the changes brought by cultural globalization. Finally, it will examine integration policies in order to assess if the concepts of "multiculturalism" and "assimilationism" are relevant to qualify the two countries, and if there are some elements of convergence between the two models.

Immigration in Sweden and France

Historically, Sweden has not been an immigration country but a land of emigration, since more than one million Swedes migrated to North America from the mid-19th century to 1930. In 1930, Sweden was a very homogeneous country. The 1930 Swedish census recorded less than 1% "foreign stock" but this figure included Lapps and Finns¹¹. The picture changed from World War II. Immigration to Sweden can then be divided into five phases :

- From 1938 to 1948, immigrants came from neighbouring countries, such as Norwegian and Danish Jews, plus some refugees from the Baltic countries.

- From 1949 to 1971, there was a labour immigration from Finland and southern Europe (Greece and Yugoslavia). Sweden officially ended labour immigration from non-Nordic countries in 1972, as most European countries did.

- From 1972 to 1989, however, immigration flows went on because of family reunification. Moreover, asylum seekers came from developing countries and from Eastern Europe.

- From the 1990's to 2008, immigration consisted of asylum seekers from southeast and eastern Europe, and of the free movement of EU citizens in the European union.

- In 2008, Sweden has decided to re-open doors to labour immigration. The new system is quite generous, compared to other European countries. Simply based on employers needs for competence, it will allow workers from countries other than European to be granted a permanent residence permit after four years of employment¹².

In 2008, according to Statistics Sweden, 17.9% of the population had foreign origins¹³ (that is to say were foreign-born or Swedish born with two foreign parents), and 6.1% were foreigners. In all, about 20% of the population "has origins in another country and another culture"¹⁴.

¹¹ Runblom, Harald, "Swedish Multiculturalism in a Comparative Perspective", in *Sociological Forum*, vol. 9, n°4, 1994, pp. 623-640.

¹² Billström, Tobias (Minister for Migration and Asylum Policy), "Sweden Opens Doors for Migrants", in *The Hindu*, November 4th, 2008.

¹³ Statistics Sweden, *Summary of Population Statistics 1960-2008*, corrected version 2009-05-13. www.scb.se.

¹⁴ SOU 2007:47 9.

In France, immigration is ancient. According to Patrick Weil, one of the best specialists of this subject, France has been an immigration country since the 13th century. In more recent times, immigration history can be divided into six phases:

- In the 1880's, France was an emigration country, with a foreign population representing 3% of the total population. But immigration soon turned into a massive one, to respond to the needs of the industrial development. In 1930, France was the country with the largest number of immigrants in the world : 6.58% of her population (more than in the USA)¹⁵. Immigrants came from other European countries, because workers from the colonial empire, whom had been given jobs during the war "did not give satisfaction"¹⁶. Nonetheless, even if it was not wished, immigration from North Africa developed, since in 1919, Algerians were allowed to go to France without permit. Immigration then further went on, despite the legislative efforts made in the 1930's to protect French workers in time of unemployment, and to send unemployed foreigners back home. After WW I, France also gave asylum to political refugees, first from Russia, then from other Eastern Europe countries.

- After World War II, a lot of immigrants came from Algeria, since a law from 1947 granted free movement to workers between France and Algeria.

- In 1974, as other European countries among which Sweden, France put a stop to working immigration, but it continued in the form of family reunification. Once again, France tried to organize the return of immigrants back home, but this project failed. The constant political motto put forward by left as well as right governments became then "zero immigration". But actually, immigration went on mainly because of family reunification and asylum seekers.

- In the 1990's, policies trying to stop immigration and illegal immigration grew tougher – as elsewhere in Europe –, resulting in a decline of permanent entries.

- In 2006, a new policy of "chosen immigration" was adopted¹⁷ : permits are granted to highly skilled workers, and foreign students are allowed to work for some times after their studies. But non-European workers will be submitted to quotas by type of job. Moreover, the control of illegal immigration – and operations of taking illegal immigrants back to the borders will be tougher.

In absolute figures, France is the second country in Europe in number of foreigners (4.9 million people, 8.1% of the population) after Germany (6.7 million, 8.8%)¹⁸. France also has the largest Buddhist, Jewish and Muslim communities in Europe. According to the definition of the French National Institute of Statistics, "an immigrant is a person living in France, foreign-born in

¹⁵ In 1931, there were 515 *foreigners* per 100 000 inhabitants in France, versus 492 in the United States.

¹⁶ Weil, Patrick, *La France et ses étrangers*, Paris, Calmann-Lévy, 1991.

¹⁷ CESEDA Law, July 24th, 2006.

¹⁸ Wihtol de Wenden, *op. cit.* 40% of these immigrants had the French nationality in 2004.

another country"¹⁹. As the French Constitution prohibits the discrimination of inhabitants in France on a religious or an ethnic basis, it is difficult to gather data and almost impossible to know, as in Sweden, how many people are foreign-born or French-born with foreign-born parents. However, demographers assess the number of French people with foreign origins is 22.5% of the population²⁰. In Sweden, the amount of population concerned by foreign origins is nearly as important, since it represents about 20% of the population. The closeness of these figures is striking, as Sweden has no colonial past. Figures also show that from the 1980's, immigration has grown faster in Sweden than in France. The speeding up of immigration during the last decades has given Sweden a totally new face, whereas in France, evolution was smoother.

This may give a first explanation why Sweden, with her relative recent immigration, has turned from assimilationism to multiculturalism, whereas France did not change her narrative. In Sweden, immigration was more recent and more rapid than in France, and the vast majority of newcomers did not have anything in common with the Swedish culture. So the need for integration policies and for an adaptation of the national identity narrative may have been more pressing. In France on the contrary, 2/3 of immigrants come from the former colonial empire. Before their arrival, they already shared some elements of the French culture, such as the French language and general culture, but also knowledge of French institutions and legal system as they had been exported to colonies. And for people not coming from the former empire, they may have been in contact with the French culture through the *francophonie*, an international organisation gathering French-speaking countries (for instance, Romania belongs to *francophonie* institutions). So France, with its equalitarian discourse, did not have to give any particular answer to cultural cohabitation, whereas in Sweden, cultural cohabitation was experienced more as an acute problem needing to be solved. It is very interesting to note that when the first debates about multiculturalism aroused in France at the end of the 1980's, they were provoked by second or third generation immigrants' descendants. They were fully integrated from a cultural point of view, but the problem was a problem of social integration²¹.

¹⁹ Catherine Borrel, *Enquêtes annuelles de recensement 2004 et 2005, près de 5 millions d'immigrés à la mi-2004, INSEE Première*, août 2006, n°1098.

²⁰ Mellon, Christian, *Immigration, les faits les chiffres, les débats, op. cit.* Moreover, according to Michele Tribalat, from the National *Institute of Demographic Studies*, around 3.7 to 4 million people would originate from "Muslim countries".

²¹ Dominique Schnapper makes a distinction between "cultural integration" that is to say the adoption of the host country's culture, and "structural" or "social" integration, which is the participation to collective life and social exchanges. Cultural *integration* has always been faster and easier than structural integration. Schnapper, Dominique, "L'échec du modèle républicain ? Réflexion d'une sociologue", in *Annales, Histoire, Sciences sociales* 2006-4, pp. 759-776.

A complementary explanation for Swedish and French stances may be found in the content of the national identity narratives of each country. The hypothesis will be here that a national identity narrative's content can facilitate its adaptation to a changing environment in some cases, but not in others.

Swedish and French national identity narratives: chances for adaptation

Sweden has long been depicted as a world exception, because of her ethnic homogeneity... Now this discourse – which was an official myth rather than an anthropological reality²² –, is completely obsolete. In the official documentation published by the Swedish Institute, one can read that “Sweden is a multicultural society. Almost a fifth of the population has roots in other countries. Immigration has made Sweden more open, international and multicultural”²³. Today, if Sweden is an exception, it is because her national identity narrative has been radically altered : the “most homogeneous country” in the world has become an officially multicultural one. The change occurred in 1974, when a Swedish Instrument of Government exhorted support for linguistic, religious and cultural groups who prefer to maintain their inherited characteristics²⁴.

Swedish national identity narrative has adapted several times in history. A major change occurred when Sweden lost her great power position in the Baltic region. The traditional identity narrative telling about glorious Gothic ancestors then changed. The new narrative accommodated the old Gothic past with the construction of a Viking myth elaborated by poets such as Esaisas Tegner and Erik Gustaf Geiger. One of the key values praised in that narrative, largely diffused in literature, for example in Almqvist's books, was poverty, which became the lot of that poor, small isolated nation Sweden had become. Poverty was combined to lutheran values. The nation was seen as diligent and industrious, cultivating discipline and self control rather than a desire for revenge²⁵. Central to this narrative was the figure of the peasant, who was sacralized during the national romanticism era of the 19th century. The peasant was considered as the core of the people, the *Folk*, as well as the heir of the Vikings. It was, according to Geiger, a figure “of an ancient and Nordic peasant, at a time when there were no slaves nor masters, a political man who

²² This discourse omitted for *instance* to mention the Sami people, or the strong German influence dating from the Hanseatic times in large towns.

²³ Swedish Institute, *This is Sweden*, Fact Sheet FS6, May 4th, 2009.

²⁴ Regeringsformen 1974, Chapter 1, *paragraph 2*.

²⁵ Stråth, Bo, “Poverty, Neutrality and Welfare: Three Key Concepts in the Modern Foundation Myth of Sweden”, in: Stråth, Bo (ed.), *Myth and Memory in the Construction of Community*, Bruxelles, Peter Lang, 2000.

goes to the assembly to make the law"²⁶. There was a tradition of considering the king as an ally of the peasants against the upper classes, so that when the political system was democratized, the State was still considered as the liberator of the individual. That's why Lars Trägårdh wrote that Swedish political culture is "closer to Rousseau and the notion of the general will rather than Montesquieu's notion of separate powers or Locke's liberal suspicion of excessive state power". It is "democratic more than liberal"²⁷.

With the rise of Social democracy, in the 1930's, the narrative evolved again. Trägårdh shows that Swedish social democracy had two characteristics: first, it operated a shift towards "nation statist socialism", that is to say it rejected classic Marxist hostility to the bourgeois state as well as the idea it should disappear. Second, it had a tendency to replace the concept of class by the inclusive concept of "folk". According to this, an emphasis was put on the Swedish Nordic democratic tradition and on the central position of peasantry in the nation. Thus, the Swedish political culture is based on a "principle of levelling"²⁸. The State is seen as an ally of the folk, as it eradicates privileges. The social contract is placed between the individual and the State at the expense of institutions, which makes a deep difference with other European countries. The first core value of the narrative is equality. This was well resumed when Per Albin Hansson formulated the concept of *folkhemmet* at the 1928 Social democratic party congress : Sweden had to become a home for the people. Social democracy emerged as the dominant political force, but socialism was more a people's party than a class party. In such a context, the nation, the State and society are virtually synonymous.

During the early 20th century, two further dimensions were added to the national identity narrative. Sweden became the prototype of modernity and a committed neutral. Concerning the first of these elements, Sweden gradually overcame her poverty to become one of the wealthiest countries in the world in the 1960's, when the myth of the Swedish model developed, as well in Sweden as abroad²⁹. Sweden was seen as a vanguard welfare state, with equality, prosperity, freedom and democracy, as core values. The second new element of the narrative, neutrality, took a particular importance during the Cold war³⁰. Sweden turned to active neutrality, criticizing the great powers' imperialism and siding with Third world in the defence of peace and justice.

²⁶ Trägårdh, Lars, "Sweden and the EU, Welfare State Nationalism and the Spectre of Europe", in: Hansen, L. Waever, O. *European Integration and National Identity*, London, Routledge, 2002, p. 135..

²⁷ *Ibid.* p.143.

²⁸ *Ibid.*

²⁹ With the book of the American journalist Marquis Childs, for instance. Childs, Marquis, *Sweden: The Middle Way*, New Haven, Yale University Press, 1936.

³⁰ Blanc-Noël, Nathalie, *La politique suédoise de neutralité active. De la seconde guerre mondiale à l'adhésion à l'UE*. Paris, Economica, 1997. Online on: <http://www.stratisc.org>.

Social democratic leaders as Olof Palme were prominent in the elaboration of this part of the narrative. They established a link between welfare and internationalism, and between internationalism and solidarity, because the Swedish model lies on a universalistic principle. So the values and the accomplishments of the social democratic welfare state had to be exported, and shared with all the suffering people of the planet. Sweden, one of the most generous providers of social welfare to her own citizens, thus became one of the most generous donors for third world development³¹. According to Arne Ruth, Swedish "third worldism" became a central aspect of Swedish national identity: "Equality at home and justice abroad have come to be regarded as complementary and mutually supporting values"³².

This committed internationalism had a logical impact on immigration. Welcoming third world refugees in the 70's and in the 80's was the continuation of solidaristic diplomacy. The turning point to multiculturalism was taken in 1974 by Olof Palme. The bill³³ allowing immigrants to keep their own culture was passed during his first mandate as Prime minister. But it is interesting to note that there was a large political consensus on it. Swedish national identity narrative undoubtedly included elements and values enabling the inclusion of immigrants in the People's home.

France's identity narrative dates from the 1789 Revolution but it was completed in the 19th Century, during the 3rd Republic. Some of the major symbols of the French republic were fixed at that time: Marianne, the feminine image of France and equivalent to Moder Svea for the Swedes, July 14th as the national day, the national history textbooks with episodes such as the Gallic ancestors and Jeanne d'Arc, etc. It may seem paradoxical that France, the country of the Revolution, never really put the people to the forefront, as it was the case in the Nordic countries. The French revolution was actually triggered off and led by aristocrats and *bourgeois*. It did not end following Rousseau's prescriptions to give the power to the people. Too afraid that universal suffrage would give way to a complete social upheaval (especially on land property questions), the actors of the Revolution preferred to follow Montesquieu's and Sieyès' theories. They invented the concept of *nation*, which took the lead over the concept of *people*, and the liberals outweighed the democrats. Thus power was given not to the concrete people made of individuals but to the nation, that is an abstract, legal body. The major question in politics then became to determine who belonged to that legal body, especially who had the right to vote and on which conditions. The nation can thus be seen as an evolutive concept, at least on the legal

³¹ Bergman, Annika, "Co-Constitution of Domestic and International Welfare Obligations. The Case of Sweden's Social Democratically Inspired Internationalism", in *Cooperation and Conflict*, vol. 42, n°1, 2007, pp. 73-99.

³² Ruth, Arne, *The Second New Nation: the Mythology of Modern Sweden*, Daedalus, Winter 1984.

³³ Prop 1974:28.

point of view (fact national identity narratives never mention, as they put forward myths of common ancestors). After the universal suffrage was finally granted to all men in 1848, it was further extended to women in 1944 and to the 18 years old in 1974, but has never been extended to foreigners living in the country. When France had to grant the right to vote to European citizens living on the territory according to the Maastricht Treaty, the Constitution had to be altered. But the right to vote for Europeans is limited. As the constitution gives power to the "nation", Europeans who do not belong to it cannot elect members of parliament, nor can they become mayors, as mayors elect the members of the Senate, and Senators are the representatives of the nation. For the same reason, extra-European foreigners do not have any right to vote.

Another deep difference between Sweden and France is, in Sweden, the history of the nation has been adapted to different losses of territories (the Baltic empire, Finland, Norway). When the Swedish dreams of Greatness definitely faded away, Swedish rulers concentrated upon domestic affairs and began to build the welfare state up. Thus the national identity narrative concentrated upon the people, and values such as equality and the praising of poverty were central in the narrative. In France on the contrary, the history of the nation consisted of fighting to hold different peoples together. Over centuries, France was unified by the monarchy who managed to dominate by dissolving local feudal powers. That is why the invention of the abstract concept of nation had another advantage: it prevented to mention the people of France was actually a mosaic, and its unifying effect was invaluable. But the fear of seeing the Republic torn apart remains as an unconscious part of the narrative. For instance, in 1991, the highest public court³⁴ refused to recognize the existence of a Corsican people, because the French constitution mentions that "the nation is one and indivisible", a sentence directly inherited from the Revolution.

The values of the Republic, "liberty, equality and fraternity" had the same unifying effect. Equality is not only an abstract value; it is the cornerstone of the whole legal system. The principle of "equality of citizens before the law" is still derived by courts from the 1789 Declaration of the Rights of Man and the Citizens, and its importance is absolutely central in everyday life... But equality has some inconvenient: it prevents the institutions to take any differences into consideration. Laws addressed to the care of particular categories of citizens such as immigrants, foreign-speakers, double-cultured children at school, etc. usually are cancelled by the Constitutional Council, on the ground that they are contrary to the constitutional principle of

³⁴ Conseil Constitutionnel, décision n°91-290 D.C. du 9 mai 1991. In the same way, the Conseil Constitutionnel reminded that "*the language of the Republic is French*", which is also mentioned in the 1958 Constitution, art. 2. However, the *Constitution* was revised on July, 23rd 2008, so regional languages are given a patrimonial value: "*the regional languages belong to the patrimony of France*" (art. 75-1).

equality, and often are mistrusted in the political debate. That is why multiculturalism does not belong to the French political and legal culture.

The second core value, liberty, is granted to all individuals, who are considered to be free from community bonds. The State is neutral, with a strong separation between public and private spheres. When Freedom of individuals is combined to Equality that means that any element of diversity belongs to the private sphere. This leads to another fundamental value, *laïcité*, a value in the name of which battles were fought during the 19th century³⁵. *Laïcité* means that religion exclusively belongs to the private sphere, but of course, freedom of consciousness is guaranteed. It is on the ground of *laïcité* that a law was voted in 2004 to forbid the wearing of conspicuous "signs or clothes displaying a religious belonging in public primary, secondary and high schools"³⁶. Finally, fraternity is not founded on a common cultural identity, but rather on the willingness to be an active member of the Republic. So the "bond of citizenship would be eroded if society were fragmented into a collection of identity groups seeking recognition of their difference instead of working toward the public interest"³⁷.

Lastly, the French narrative insists on the universalistic value of its elements. But it is very different from the kind of universalism advocated by Ulrich Beck³⁸. For the great German sociologist, universalism is a double-belonging: the citizen belongs both to his country *and* to mankind. In France on the contrary, traditional universalism belongs to a much more ancient type³⁹: it is an imperialistic universalism that means bringing to the world values that fit every man for every times. In other words, the French narrative functions as if the values it is bearing were invented in France, and as if the world waited for France to export them. The French colonial discourse, for instance, was typical of this will to "generously export civilization"⁴⁰. Universalism, combined with the other elements of the national narrative, explains the attitude of France towards immigration: to put it roughly, immigrants are expected to integrate the nation by themselves, given that they are free and equal, and that the French model of democracy is so universal they will want to share fraternity by adopting it... That is why France has been depicted

³⁵ Article 1 of the 1958 Constitution proclaims that "France is an indivisible Republic, laic, democratic and social. It ensures equality in the eyes of the law, for all the citizens, without distinction of origin, race or religion. It respects all beliefs. Its organisation is decentralized".

³⁶ Loi n°2004-228 du 15 mars 2004. See: Bowen, John, "Why did the French Rally to a Law Against Scarves in Schools?" in *Droit et société*, 2008/1, n°68, pp. 33-52.

³⁷ Laborde, Cécile, "The Culture(s) of the Republic. Nationalism and Multiculturalism in French Republican Thought", in *Political Theory*, Oct. vol. 29, n°5. 2001, pp. 716-735.

³⁸ Beck, Ulrich, *Pouvoir et contre-pouvoir à l'heure de la mondialisation*, op. cit.

³⁹ Alexander the Great, for instance, had the same interpretation of universalism.

⁴⁰ The most famous piece of this particular part of the narrative can be found in the discourse by Jules Ferry at the Assembly on July 28th, 1885.

as an assimilationist State. But a more accurate way of qualifying the French attitude to immigration would be to talk of a “generous, imperialistic, equalitarian universalism”. Unfortunately, good sentiments sometimes result in bad effects... Such a passive attitude towards integration did work with the first waves of immigration, with people coming from neighbouring countries, especially with the numerous political refugees sharing the ideals of the French Republic... But difficulties appeared in the 1970’s, with immigration from third world countries, even if newcomers from the former colonial empire already shared some elements the French culture. From the 1980’s on, it has become more or less recognized there was something wrong with the national identity narrative, until the two candidates to the 2007 presidential election introduced the subject in the electoral campaign for the first time⁴¹.

In sum, the contents of the Swedish and French narratives largely determined the way the two countries adapted themselves to the speeding up of globalization. In Sweden, where the people and the nation are synonyms, it was logical to extend the benefits of the *folkhemmet* welfare state to all citizens, regardless of their origins. The change from an assimilationist stance to a multicultural one can be seen as a development and an extension of traditional values rather than a radical transformation. When the national identity narrative included the connected values of welfare and internationalism, they were extended to immigrants in the domestic sphere. It was also a logic enforcement of traditional values of equality and solidarity. France on the contrary has so far never considered herself a multicultural country. The French national narrative, elaborated on the purpose to keep different peoples together, cannot afford to open the doors to diversity. The opponents to multiculturalism are numerous, and their favourite argument is that it would enable the creation of “communities” that would put the Republic in danger. However, since the 1990’s (some would say since the 1998 Football world cup, that was won by a “black, white, *beur* (Arab) France”), the national identity narrative began to sound more and more artificial. There is today a great uneasiness about these questions in France⁴². On one hand, there is a rigid, equalitarian narrative that seems to prevent any evolution, and on the other hand, there is a growing sense it does not fit reality any more. Governments and intellectuals – as well as suburban citizens in street riots – are looking for a new self definition of the nation. But the general feeling is uncertainty, both in the formulation of the problem and in conceiving solutions. Anyway, France is actively looking for a satisfactorily way to adapt her national narrative. In

⁴¹ President Sarkozy, from the Republican party, wanted to open the debate about “the crisis of the national identity” and his socialist opponent, Ségolène Royal, proposed that each French citizen would put a French flag on his balcony for the national day (but contrary to what is done in Sweden, in France exhibiting flags is usually considered as reactionary and this proposal was felt as controversial).

⁴² Sala Pala, Valérie, Simon, Patrick, “Public and Political Debates on Multicultural” in *Crises in France*, EMILIE – Reports on Multiculturalism Debates, May 2007. <http://www.eliamep.gr>

nowadays globalization, it would be nonsense to go on pretending the country is homogeneous... No need to name the over-numerous foreign artists who form France's cultural patrimony, from Leonardo da Vinci and Picasso to Jacques Brel or Johnny Halliday – Nor to hide the fact that the President comes from Hungary and has married an Italian woman... In Sweden as well, the national identity narrative is under discussion. Multiculturalists' good intentions have not always been well rewarded. Discrimination and, more surprising, violence entered the Swedish model and are now considered as problems to be solved.

In the third section, we will examine how the Swedish and French narratives, are connected to integration policies and what is the actual nature of these policies.

The Swedish and French models of integration in perspective

From the 1970's on, Sweden developed an ambitious, multicultural integration policy, in spite of what can be called a lack of experience in dealing with multiethnic questions. The traditional assimilation policy was replaced by multiculturalism in the 1974 constitutional reform⁴³. It was intended to grant immigrants certain cultural rights and was based on three principles: Equality, Freedom of choice, and cooperation. *Equality* was understood as parity between the Swedish citizens and migrants in terms of rights, opportunities and duties. *Freedom of choice* meant immigrants' right to choose whether they wanted to keep their original culture, and the *cooperation* goal meant concord between majority and minority populations. It implied voting rights at the local elections, granted in 1975⁴⁴.

In the 1980's, with the creation of the Board of Immigration, an ambitious programme of integration was established, focused on language and vocational training. But it was not a success. It generated dependency on welfare, especially because housing allocated to migrants was mostly located in places with high unemployment. At that time, as in other countries having adopted it, the very concept of multiculturalism was criticized and accused of having undesirable side-effects, such as addressing to fixed cultural communities and ignoring the liberty of

⁴³ Harald Runblom notes that prior to that date, "The established attitude was that immigrants should become Swedes", and he quotes a statement by the Swedish foreign minister, Östen Undén made in 1945 about the 30 000 Balts that had arrived at the end of the war: "it would be best for these groups if they returned to build up their home country, the Soviet Union. If they were to stay in Sweden, they were expected to become Swedish and behave as Swedes". Runblom, Harald, "Swedish Multiculturalism in a Comparative European Perspective", in *Sociological Forum*, vol. 9, n°4, 10994? p. 623-640.

⁴⁴ As well as recognition of indigenous minorities' cultural rights: Since 2000, five minority groups are officially recognised: the indigenous Sami peoples, the Swedish Finns, the Tornedalers, the Roma and the Jews. The officially recognised languages are Sami, Finnish, Meänkieli (Tornedal Finnish), Romani Chib and Yiddish.

individuals to make up their own mixed culture. Moreover, it was clear that immigrants suffered from various forms of discriminations. In 1986, an Ombudsman Against Ethnic Discrimination was established, Sweden becoming one of the first European countries to recognize discrimination, trying to fight against it. Criticisms also noted that Swedish multiculturalism was not a true multiculturalism, as Sweden had not completely abandoned her traditional assimilationist stance. For instance, in 1986 the government specified that multiculturalism was placed "within the framework of the basic norms that are valid for human coexistence in our society". If immigrants were granted a cultural freedom of choice by the Constitution, this choice should not contradict Swedish essential values and norms.

In the 1990's, a new concept, diversity, was introduced to replace multiculturalism. Integration was no longer regarded as a unilateral process of incorporating migrants into society, but as a process of mutual adaptation. However, the 1990's diversity policy did not result in any obvious improvements, especially because there was a deep economic crisis at that time, which hit immigrants very hard⁴⁵. From 2000 to 2006, a series of measures to promote integration were taken. In 2007, a new Ministry for Integration and Gender Equality was created. Its policy is based on the Government Bill "Sweden, the Future and Diversity – from Immigration Policy to Integration Policy"⁴⁶. Diversity has to be the point of departure for shaping general policies in all sectors and at all levels of society. A particular emphasis is put on efforts to fight against racism and ethnic discrimination. Integration efforts will focus on creating opportunities that enable individuals to support themselves and participate in society, safeguarding basic democratic values and working to secure equal rights and opportunities for women and men. Moreover, since the 2006 elections, an emphasis has also been put on the fact that Swedish population is ageing and that needs for labour will grow in the future.

In 2007, the Migrant Integration Policy Index (MIPEX)⁴⁷ has found Sweden was number 1 among 28 countries to integrate non-European immigrants, whereas France was at the 11th rank. But the multicultural nature of this policy is largely questioned. On one hand, it is questioned by those who think it has failed, given the occurrence of discrimination, racism and urban riots such as in 2007 and 2008 in Malmö⁴⁸. On the other hand, it has been questioned on a conceptual basis.

⁴⁵ Sainsbury, Diane, "Immigrants' Social Rights in Comparative Perspective : Welfare Regimes, Forms in Immigration and Immigration Policy Regimes", in *Journal of European Social Policy*, vol. 16, 2006, pp. 229-244.

⁴⁶ SOU 1997 :55.

⁴⁷ The MIPEX is an EU-financed project produced by a consortium of European organisations, led by the British Council. It is based on around 140 indicators. <http://www.integrationindex.eu>

⁴⁸ For a picture of suburban Sweden, see: Caldwell, Christopher, "Islam on the Outskirts of the Welfare State", in *The New York Times*, February 5th, 2006. (online).

There remains a strong assimilationist element in Swedish multiculturalism. For instance, on the website "Sweden abroad", the authorities state that the goal of the integration policy is to help immigrants "become fully functioning members of the community"⁴⁹. In the report *Integration Policy for the 21st Century*, the Swedish government states that the integration process is conditional, for example, on mutual respect for cultural differences, so long as these do not conflict with the fundamental democratic values of society⁵⁰. Many social scientists conclude, as Charles Westin, that "unofficially assimilation is still seen as the best solution. Integration the Swedish way basically boils down to a form of subtle assimilation" by the means of "bureaucratic societal control mechanisms"⁵¹. Another criticism is largely made to Swedish multiculturalism. It has been noted that the debate about cultural diversity actually is a debate about ethnic differences. To Magnus Nilsson, for instance, "the hegemonic discourse about Sweden as a multicultural society is based on a narrative centred on an opposition between a culturally homogeneous past and a present which, *because of migration*, has become culturally diverse"⁵². And to Alexandra Ålund, immigration is in this way associated with deviance and subject to discrimination⁵³.

Swedish multiculturalism, as generous as it may be, contains an assimilationist dimension. But the emphasis put by the authorities on the common democratic values and on mutual integration allows Sweden to prevent the worse shortcomings of pure multiculturalism. As a matter of fact, the recognition of a diversity of cultures composing a nation is always a dubious thing, as the shapes and the number of these cultures are but the result of an arbitrary choice. When such cultures are officially recognized, what room is made to the individual's freedom to belong to them not, or to belong to several cultures...? And what about extreme cultural relativism, when society tolerates that individuals, especially women, are oppressed or physically mutilated in the name of "their culture", or when courts punish honour crimes less severely, giving "the culture of the culprit"... Finally, what is the meaning of belonging to an immigrant culture after two, three or four generations spent in the host country? So it seems that the Swedish model of integration takes into account the possible shortcomings of multiculturalism and avoids them as much as possible. A

⁴⁹ http://www.swedenabroad.com/Page___43018.aspx

⁵⁰ Regeringskansliet, *Integrationspolitik för 2000-talet*, 2001/02:129.

⁵¹ Westin, Charles, *Striking a Balance Between Diversity and Social Cohesion: Examples from Sweden*. National Europe Centre Paper n°74. Paper presented to conference entitled *The Challenges of Immigration and Integration in the European Union and Australia*, 18-20 February 2003, University of Sidney.

⁵² Nilsson, Magnus, "Diversity and Homogeneity in a "Multicultural Society" : A Critique of the Pervasive Picture of Collective Identities."

<http://imer.uib.no/14Nordic/Papers%20fra%2014%Migrasjonsforskerkonferanse/Nilsson.pdf>

⁵³ Ålund, Alexandra, "Swedish Multi-cultural Society", in *Soundings*, vol. 9, 1998, pp. 176-180.

balance is made between on one hand the recognition that Sweden is now hosting a diversity of peoples from different origins – and that it is a chance and a need for a country with an ageing population, and on the other hand on the fact that social cohesion is best guaranteed by common democratic values.

In France, as the country never pictured itself as a country with cultural diversity, immigration policy existed rather as a matter of fact than as a named policy. It was not formulated as separate from the general social policy. According to the equalitarian nature of French law, the authorities must not make any difference between nationals and immigrants when they grant social rights. That is not to say that nothing was made. For instance, at the end of the 80's, a vast programme called "Policy of the Town" was elaborated. Officially, it was not aimed at integration nor immigration, but at "difficult suburbs", where migrant populations form an overwhelming majority of inhabitants... In the 1980's however, under the pressure of social movements (such as the *Beur* (Arab in slang) movement, "SOS racism", and "Touche pas à mon pote" (Don't touch my pal⁵⁴), as well as with the rising of extreme right vote, things began to change gradually, and a consciousness that France was more diverse than her narrative pretended she was began to arise.

In 1989, an official recognition of diversity was made with the creation of the High Council for Integration. It gave a definition of integration rejecting assimilation⁵⁵. Its official doctrine tried to find a balance between the traditional republican values and the necessity to adapt to the actual sociological situation. It stated that first, integration is an individual process and the State will not recognize institutionalized communities, which would put the unity of the nation in danger. Second, the cornerstone of the integration process is the granting of citizenship, and the French code of nationality is one of the most open in the world⁵⁶. Third, the concept of integration is linked to the principle of equality. However, if the taboo about the French society diversity is less pregnant nowadays, France still has difficulties in representing herself as ethnically plural. The country is faced with a conflict of values, republican and universal on one hand, democratic and open to otherness on the other. Yet, it is interesting to note that the concept of assimilation is unanimously rejected. In the years 2000, things have considerably changed. Many debates were open, such as the debate on colonialism and its recognition, and many measures were taken to solve concrete integration problems.

⁵⁴ The Swedish counterpart of "Touche pas à mon pote" was called "Rör inte min kompis".

⁵⁵ Haut Conseil à l'Intégration, *L'intégration à la française*, Paris, UGE, 1993, coll. 10/18.

⁵⁶ However, since the granting of nationality is a specific attribute to the State, there are debates nowadays to assess if the enforcement of the code is more or less restrictive.

However, historians would notice that it is not until the 2004 so-called "headscarf affair"⁵⁷ and most of all, until the November 2005 riots that things radically changed⁵⁸. These violent riots triggered off by the death of two young boys in an electric transformer, and followed by three weeks of violence against public institutions, were a mere surprise to the general public. Politicians, intellectuals and the media tended to interpret them as an emergence of "communitarianism requesting a strong republican reaction"⁵⁹. But several social scientists showed that the riots, "far from expressing community claims, expressed the demand of an effective implementation of the republican principle of equality from the part of young French citizens experiencing day-to-day segregation, racism and unemployment, as well as exclusion from the traditional political expression"⁶⁰. These events operated as a shock and were followed by institutional reactions.

In 2006 a "National Agency for Social Cohesion and Equal Opportunities" was created. In 2006 too, the government, acknowledging the fact that one third of immigrants have a poor command of French language, created an Initial Diploma of French language (DILF, *Diplôme initial de langue française*), and intended to validate a basic level of French by all foreigners. This diploma is nowadays a perquisite to obtain a resident permit. This may be considered either as a toughening of the code of nationality, or as a progress, as to this date, it was in practice very difficult for immigrants to find free and good quality French courses, adapted to the needs of the labour market⁶¹. Moreover, particular efforts have been made by the media, which have been

⁵⁷ The so-called "headscarf affair" actually began in 1989, and several similar events (girls refusing to quit their veil excluded from public schools) happened ever since. But in 2003-2004, there was an intense debate on this issue, widely covered by the media, in the context of a growing Islamic fundamentalism and of the creation of the Committee of reflection on the implementation of the principle of *laïcité* in the Republic appointed by President Jacques Chirac in 2003 (The Stasi commission). A parliamentary mission of information on the issue of religious signs at school was also created in 2003. Finally, the March 15th, a "Law regulating, in application of the principle of *laïcité*, the wearing of signs or clothes displaying a religious belonging in public primary, secondary and high schools" was adopted.

⁵⁸ On these affairs, see : Schnapper, Dominique, "L'échec du 'modèle républicain'?" op. cit. Wieworka, Michel, "L'intégration : un concept en difficulté", in *Cahiers internationaux de sociologie*, n°125, 2008-2, pp. 221-240.

⁵⁹ Sala Pala, Simon, op. cit.

⁶⁰ *Ibid.* For additional scientific studies, see : Sala Pala, V. Novembre 2005 : "Sous les émeutes urbaines, la politique" in *French Politics, Culture and Society*, vol. 24, n°3, 2006, pp. 111-129 ; Muchielli, L. Le Goaziou, V. (eds.), *Quand les banlieues brûlent... Retour sur les émeutes de novembre 2005*, Paris, La Découverte, 2006 ; Lagrange, H. Oberti, M. (eds.), *Émeutes urbaines et protestation, une singularité française*, Paris, Presses de Science po, 2006 ; Schnapper, Dominique, "L'échec du modèle républicain ?" op. cit.

⁶¹ The teaching of the French language to immigrants was mainly the responsibility of associations but nothing was systematic. And many people are still living in France, especially unemployed women, without any capacity to speak or read. For children, classes for "fresh-immigrants" exist, but their number is far

accused not to represent the actual ethnic diversity of the country. Broadcasting companies have recently made considerable efforts to promote diversity: here and there, coloured faces have appeared on the screens, although these efforts are found insufficient by associations representing minorities. In 2006, a national 8 o'clock TV journal was attributed to a black man, Harry Roselmack. The issue raised a controversy, in spite of the fact that man came from Martinique, a Caribbean island that has been French... since the 17th century, that it to say for a longer time than the Nice region... The ridiculousness of this controversy showed how urgent it was to raise the diversity question on the public scene⁶². In June 2007 for the first time, a Ministry for Immigration, Integration, National Identity and Co-development was created to enforce a policy of integration and to fight against illegal immigration. This ministry has four main objectives: to restrain immigration flows, to promote integration process, to promote French identity and to encourage "co-development" (that is to say helping countries of origin to develop). The name and missions of this new ministry were very controversial. The opposition generally found the idea of linking immigration and national identity irrelevant. Nevertheless, the very existence of this ministry shows a real recognition of the fact a change is necessary. In 2009, the government launched a "great debate on national identity": 350 meetings were organized all over in the country, and an internet site was open to ask the French "What does it mean to be French today?". The debate resulted in a few proposals intended to enhance patriotism: the national flag and the Declaration of the Rights of Man and of the Citizen will be displayed in schools; civic instruction will be perfected, etc. But one can ask if this innovative way of talking about the national identity will have anything to do with an adaptation of the national identity narrative to the evolution of the actual nation. As several social researchers already remarked, the government's intention was rather to reinforce the feeling of belonging and the acceptance of the existing narrative, that is to say the "great debate" was a manifestation of assimilationism rather than an opening to adaptation.

Anyway, a careful look at France's integration model shows it is not as assimilationist as it is generally depicted. Even if Universalist, equalitarian principles impose a rigid frame on integration policies, there is a good deal of multiculturalism in French society. Assimilationism "*à la française*" can be understood as a general frame behind which all differences belong to the private sphere, and are actually and legally tolerated... Moreover, social necessities have made this frame evolve. Patrick Weil noticed that since the establishment of the 10 years resident card in 1984, long term

from sufficient, and the teaching conditions are disastrous (overcrowded classes and very few specialized teachers). Here the difference with Sweden is striking.

⁶² Harry Roselmack has finally become a very popular TV celebrity, a fact that shows the contradictions of the French society: openness to otherness is real but at the same time there is a huge lack of thinking about diversity and a urgent need to have the national narrative evolve.

immigration has officially been recognized. To him, the fact the French law of the nationality is one of the most open in Europe is also a sign of this recognition⁶³. But he also warns that France has not done enough against discrimination, and he writes that "What is lacking is that this diversity should be better taken in account in the national history and narrative. A nation is also a narrative... that allows citizens with different pasts to make it out"⁶⁴. Moreover, Patrick Weil thinks the French equalitarian political and legal culture is a convenient tool for elaborating a good integration policy, provided that equality is put forward and accompanied by anti-discrimination measures. To Jean-Loup Amselle, a well-known anthropologist, France is far more multiculturalist than she pretends to be⁶⁵. First of all, assimilationism has not always been an easy policy to enforce, as demonstrate the legal tolerance for some practices such as polygamy, or the rather mild punishments for excision, on the ground that the culprits were under custom influence (an argument typical of multiculturalism). Moreover, a form of multiculturalism has developed through social policies of "positive exclusion", aimed at some socially disadvantaged areas on the ground that welfare state social policies have failed. But, according to Amselle, this policy will do nothing but creating more exclusion. A good integration policy would consist on the contrary in opening difficult suburbs and in generating social mixity. The French growing form of multiculturalism is actually based on racial terms and opposing a "French ethnicity" to "minority communities". According to the anthropologist, this is very dangerous, and the risk is that "consolation identities" such as radical Islamism will develop. As a matter of fact, we can observe that the concept of "communities" has recently appeared in the media and is now widely used by journalists, as a form of politically correct way to depict any part of the French population that does not match an ideal yet false image of the "French ethnicity". This very un-French, USA imported way of thinking is problematic as communities have no precise shape nor legal existence in France, and the vagueness as well as the racial content of the concept is dangerous in terms of social cohesion. This vagueness can easily been exploited by politically oriented groups, eventually fighting democracy. It may also be confusing for young people with mixed origins, or living in true mixed contexts, to which "communities" mean not much. Some months ago, a TV reporting showed riots opposing "Turkish" to "Arab" boys in a suburb. The "Arab group" was questioned, and the spectator could see it was composed of very different looking boys, among whom two black boys who declared be "more or less Muslims" and a ginger-haired little boy who declared "Yes I *am* an Arab, because all my friends are"... That is why the advice given by Jean-Loup Amselle seems to be invaluable; he reminds that anybody has the right to choose the identity he wants, and that the

⁶³ Weil, Patrick, *La république et sa diversité*, Seuil, Coll. La république des idées, 2005.

⁶⁴ *Ibid.*

⁶⁵ Amselle, Jean-Loup, *Vers un multiculturalisme français*, Paris, Flammarion, coll. Champs, 2001.

value of the republican stance is that it “consists of deconstructing particular identities to protect what is universal in each of us”. And he suggest a good policy to cool down the risky claims of some social actors would be to teach how identities have become what they are, that is how identities were historically and socially constructed.

Conclusion

France, Sweden and other European countries are now faced with the need to adapt their national identity narratives to a globalized context. This will be a particular difficult challenge for the 21st century. The national narratives were constructed to respond to historical situations. Nowadays, these situations are changing faster than ever. The Swedish case seems to show that a brutal change of national narrative cannot have immediate effects, whereas the French attitude consisting of sticking to an obsolete narrative has no more positive effects. Moreover, the two countries examples show that both multiculturalism and equalitarian universalism can have bad effects on national social cohesion. So both countries rather try to find a balance between universal democratic rights and diversity recognition. To solve this difficult challenge, it is time to learn lessons given by history, and especially by the Global history works. They show that diversity has always been constitutive of human history, and that the frames of cultures have always been moving, at various paces. In a globalized world, they will move and maybe fade or merge a little faster than previously, but the important thing is we realized that global mixity was a chance for mankind. As Jan Nederveen Pieterse wrote, “in a historical sense, we are all migrants”, because our ancestors have all travelled to the places where we have come from⁶⁶. No doubt national identity narratives will have, in a near future, to get closer to the historical reality to give a better response to sociological challenges. The recognition of the hybridity of any culture should be a tool to adapt national narratives, paving the way to tolerance.

⁶⁶ Nederveen Pietersee, *Globalization and Culture*, op. cit. p. 32.