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Chapter 3 *Kiran Grewal* 'The Threat from Within' Representations of the *Banlieue* in French Popular Discourse

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'THE THREAT FROM WITHIN' - REPRESENTATIONS OF THE BANLIEUE IN FRENCH POPULAR DISCOURSE

Kiran Grewal

This paper explores representations of the banlieue (literally translated as 'suburb' but used to refer to the poor housing estates on the outskirts of major cities) in French popular discourse. The banlieue is generally represented in France as a violent, highly masculinised space associated with immigrant communities. With immigration and ethnic relations holding prominent places in public discourses across Europe, the banlieue is used in France as an indirect means of discussing ethnicity and national identity. Furthermore, the banlieue has become a site where France's problematic relationship with Islam is played out, in a Europe struggling to define its relationship with Muslims both within and outside of its borders. In recent times a new 'voice of the banlieue' has emerged in the form of Ni Putes Ni Soumises, an association representing 'women of the banlieue', which has been given extensive media coverage and political support. However critics argue this association has done little more than reinforce dominant stereotypes of the banlieue, which in turn perpetuate and justify racist and patriarchal discourses in French popular discourse.

Introduction

The term *banlieue* literally translates as 'suburb' but in fact denotes a geographical area on the periphery of major cities and made up of poor housing estates. In recent times it has held a prominent place in French popular discourse, a recent example being its association with the 2005 riots. This paper asks two questions; how is the *banlieue* represented in French popular discourse? What is the significance of these representations? In attempting to answer these questions this paper will explore the extent to which a relationship can be identified between these representations and the constructed French national identity, its policy of integration and its relationship with its immigrant and ethnic minority communities. While this paper looks specifically at the situation in France, it is argued that certain points of convergence can be identified with other nations in Europe, many of which are also currently grappling with the

challenges posed to their imagined communities by immigration, Islam and the management of ethnic minority groups.

As Alec Hargreaves points out, "[t]he myth of a culturally distinct and homogenous nation-state has been central to the political history of modern Europe."¹ With the decline in importance of the nation state, through the emergence of the European Union and the impact of increased globalisation destabilising the old economic order, nations throughout Europe have been faced with an 'identity crisis'. One response to this crisis has been through the recreation of frontiers in place of the dismantled national boundaries and the affirmation of a 'European identity' in opposition to non-European immigration and cultural influences. The growing importance of immigration as an issue of public concern in European states has been identified by various academic commentators,² with the popular media across Europe playing upon insecurities within European societies through representations of an 'immigration crisis' with illegal immigrants, asylum-seekers and most particularly Muslims identified as a threat to Europe.

At the same time, the increased realisation that many of the post World War II non-European migrant populations can no longer be seen as temporary solutions to labour shortages but permanent features within the nation, many European societies are facing a significant internal challenge to their mythical homogenous nations. This challenge appears to have particularly manifested itself in the new prominence of Islam. In his analysis of Muslim immigrants in Italy, Stefano Allievi demonstrates how Islam, while long considered 'the enemy' to most European nations, now plays a significant role within Europe; "[f]rom the alternative 'Islam or Europe'... to the juxtaposition 'Islam and Europe', we are now at the factual situation of 'Islam in Europe'."³

¹ Alec Hargreaves G., *Immigration, 'Race' and Ethnicity in Contemporary France* (London: Routledge, 1995), p.87.

² For example, see Friedrich Heckmann, 'Integration Policies in Europe: National Differences and/or Convergences?' European forum for migration studies ('efms') Paper 33, University of Bamberg, presented at European Research conference, *European Societies or European Society? Migration and Inter-Ethnic Relations in Europe*, Eurovillage d'Obervillain, France, 23-28 September 1999 - http://web.uni-bamberg.de/~ba6ef3/pdf/efms_p33.pdf, accessed 15 November 2006; Ahmed Al-Shahi and Richard Lawless(eds.), *Middle East and North African Immigrants in Europe* (London and New York: Routledge, 2005); and Jonathan Laurence & Justin Vaisse, *Integrating Islam: Political and Religious Challenges in Contemporary France* (Washington D.C.: Brookings Institution Press, 2006).

³ Stefano Allievi, 'Sociology of a Newcomer: Muslim Migration to Italy – Religious Visibility, Cultural and Political Reactions' in Ahmed Al-Shahi and Richard Lawless (eds.), *ibid*, p.44.

In response, the 'Clash of Civilisations' discourse, also a foundation of many of Europe's colonial enterprises, has gained new credence with a tendency in various European nations to firstly identify Islam as fundamentally incompatible with European values and secondly, blur the distinction between European Muslims and Muslim nations external to Europe. The reluctance to accede to Turkey's request to enter the European Union demonstrates the extent to which there still exists resistance within Europe to the recognition of Islam as existing alongside a European identity. The assassination of the Dutch politician Pim Fortuyn, known for his highly critical stance on Islam has been argued to have directly contributed to illegal immigration becoming the focus of EU debates, particularly at the Seville summit in June 2002.⁴ So too, the controversy regarding the cartoons of the Prophet Mohammed printed in a Danish newspaper further aided the placing of Islam in opposition to secular Western democratic nations.

France provides a useful starting point for an analysis of the intersections of nationalist, anti-immigration and anti-Islam discourses in Europe as it is often the country referred to as justifying European fears. France has the biggest Muslim population within Europe (with an estimated 5 million Muslims – approximately 8% of the population) and through the infamous *affaires du foulard* of 1989 and 2004, has been representative of other state's struggles between the espoused secularism of the state and the recognition of minority religious rights (most recently, the furore surrounding the Danish cartoons of the Prophet Mohammed and the British controversy regarding Jack Straw's comments regarding the *chador*). Furthermore, following the riots in October and November 2005, the problem of the French *banlieue* and the issue of integration has served to fuel securitarian discourses across Europe.

However, in looking at the French example, it is important also to bear in mind certain specificities, for example; France's colonial legacy which is closely tied up with the Muslim world, its particular tradition of citizenship based on French revolutionary Republican principles and its consequential rejection of the language of ethnic/race relations. It is argued that it is in the context of these specificities that representations of the *banlieue* must be interrogated. In doing this, it is argued that the *banlieue* can be seen as not

⁴ Al-Shahi and Lawless, *supra* note 2, pp.1-2. This is despite the fact that the assassin was actually a white Dutch man, associated with the animal rights movement.

simply representing a threat to French national and social cohesion but perhaps also as an opportunity for France to attempt to reinforce its particular founding national myths, in opposition to both its ethnic minority communities and the rest of Europe.

PART ONE: THE *BANLIEUE*

(a) Urban Violence

The *banlieue* has historically been a zone on the periphery; firstly separating the working classes and poor from bourgeois *intra-muros* society and later a zone of immigration. It has also long been spoken of in ominous terms; a site of the 'dangerous classes' who pose a threat to French society and social order.⁵ This language of threat has only gained in prominence with the increasing association of the *banlieue* with juvenile delinquency in media and academic discourse since the 1960s.⁶ However, it was in 1981 and the '*Été Chaud de Minguettes*' ('the hot summer of the *Minguettes*', a housing estate on the outskirts of Lyon where riots erupted in the summer of 1981 resulting in the mass burning of cars and wide-scale vandalism and property damage) that the criminalisation and stigmatisation of the *banlieue* became crystallised within media discourse.⁷ As Laurent Bonelli documents, from this time on there has been an increasing emphasis within both political and media discourse on the threat of the *banlieue* through representations of the high risk of crime and the need for greater police presence and tougher measures (most famously summed up by the current Minister for the Interior, Nicholas Sarkozy's reference to "cleansing" the *banlieue* of its 'scum'). Bonelli also notes the manner in which petty crime and delinquency have been presented within public discourses as the first step towards organised crime and terrorism, suggesting that even relatively minor acts of vandalism hold the potential for far greater negative

⁵ Henri Rey documents this history in his book, *La Peur des Banlieues* (Paris: La Bibliothèque du Citoyen, Presses de la Fondation Nationale des Sciences Politiques, 1996), and identifies the *banlieue* as previously referred to as the "Red district" due to its close association with communism.

⁶ Guy Lochard, 'La question de la banlieue a la television francaise: mise en place et evolution d'un conflit de representations', in Marilia Amorim, *Images et Discours sur la Banlieue: Questions vives sur la banlieue* (Paris: Editions eres, 2002), p.34.

⁷ Ibid, p.37; Christian Rinaudo, *L'Ethnicité dans la Cite: Jeux et enjeux de la catégorisation ethnique* (Paris and Montreal: L'Harmattan, 1999), p30; and Angelina Peralva & Eric Macé, *Médias et violences urbaines: Débats politiques et constructions journalistiques* (Paris: La Documentation française, 2002), p.18.

impact on French societal structures and security.⁸ This phenomenon has become known in France as the '*les violences urbaines*' (literally translating as 'Urban Violence' but holding wider reaching connotations, encompassing the various theories of "criminal spectrum" set out above) and has been shown to hold great sway within current French popular discourses.

(b) The Ethnicisation of the *Banlieue*

Alongside the increased association of the *banlieue* with violence and crime, the image of the *banlieue* has become increasingly ethnicised. This ethnicisation of the *banlieue* is partly based on demographic reality (as will be discussed later in this paper). However, while immigrant communities are proportionally higher represented within the *banlieue* than within the broader French society, the image of the *banlieue* as a site of immigration is also an image that has been exaggerated with popular discourses drawing on the American example of the ghetto, despite rejection of this comparison by scholars and sociologists.⁹ As Christian Rinaudo explains; "[d]uring the 'hot summer of the Minguettes', the media described an ethnicised universe in which the image of the immigrant and that of the "yob" became superimposed."¹⁰ Rinaudo goes on to quote from an article in the *Nouvel Observateur*, a respected, national mainstream magazine of the Left, which described the *banlieue* of Lyon as, "a hideout of young, angry Arabs, unemployed and more or less delinquent."¹¹ Similarly, Véronique de Rudder points out: "Not all the youth involved in the urban uprisings are of immigrant origin but amazingly we only see those with tanned skin."¹²

Eric Macé and Angelina Peralva, in their analysis of the phenomenon of

⁸ Bonelli, 'The Control of the Enemy Within? Police Intelligence in the French Suburbs (banlieues) and its Relevance for Globalization' in Didier Bigo & Elspeth Guild (eds.), *Controlling Frontiers: Free Movement Into and Within Europe* (Aldershot, England and Burlington, USA: Ashgate, 2005), pp.194-195.

⁹ See Rey, *supra* note 5.

¹⁰ Rinaudo, *supra* note 7, p.30: 'Lors de l'été chaud des Minguettes', les médias décrivent un univers ethnicisé dans lequel l'image de l'immigré se superpose à celle du jeune voyou.'

¹¹ Rinaudo, *supra* note 7, p.31: 'un repaire de jeunes Arabes en colère, chômeurs et plus ou moins délinquants.'

¹² Interview in Gérard Baudin & Philippe Genestier (eds.), *Banlieues à Problèmes: La construction d'un problème social et d'un thème d'action publique* (Paris: La documentation Française, 2002), p.114: 'les jeunes impliqués dans les révoltes urbaines ne sont pas tous d'origine étrangère, mais fantasmatisé ment, on ne voit que des jeunes basanés.'

'*les violences urbaines*' within media discourse, also note that the *Beur*¹³ movement which rose in the late 1980s to counter the effects of racism on the immigrant population served to further link the *banlieue* with those French residents of (predominantly) North African background within the public imagination.¹⁴ Thus, with the fragmentation of the *Beur* movement due to differences within its leadership and aims, the *banlieue* remained viewed as a site of social unrest with the young French residents of North African origin defined as those largely responsible. In this way, within current media and public discourse, the term *banlieue* has become a byword for areas inhabited by minority ethnic groups and particularly by 'foreigners', Muslims and most especially 'Arabs'. As Mireille Rosello describes it:

Those demonized *cités* are the symbolic crossroads where anti-Arab feelings crystallize around issues of housing: images of drug-ridden basements and of vandalized letter-boxes are ethnically encoded. Gradually, amalgams permeate French culture, certain types of housing are equated with violence or even terrorism, and immigration is reduced to a gendered caricature: to the menacing silhouette of armed young male delinquents.¹⁵

The fear of the *banlieue* has become a fear of the *étranger* in general, and more specifically a fear of the African, the North African/Arab first and foremost.¹⁶

In late October 2005, following the deaths of two young French men of Malian and Tunisian descent who were being chased by the police, riots erupted across France. While there was unrest in 274 towns and cities, the majority of the rioters were identified as young men from the *banlieue* around major French cities. Images of the riots served to reinforce the construction of the *banlieue* as a site of juvenile male delinquency and violence with the symbolic image of the *banlieue*, burning cars, once again dominating the public space. While expert responses to the riots focussed on the socio-economic conditions, such as the high levels of unemployment

¹³ A *banlieue* term initially used by the French-born children of North African immigrants to describe themselves but which has subsequently been adopted into mainstream French slang and as a result has diminished in its use.

¹⁴ Macé & Peralva, *supra* note 7, p.19.

¹⁵ Mireille Rosello 'North African Women and the Ideology of Modernization: From *bidonvilles* to *cités de transit* and HLM' in Alec G. Hargreaves & Mark McKinney (eds.), *Post-Colonial Cultures in France* (London and New York: Routledge, 1997), p.240.

¹⁶ Rey, *supra* note 5, p.11.

and stigma faced by *banlieue* residents (many of whom are second or third generation French residents of immigrant backgrounds), within popular discourses attempts were made to link the riots to illegal immigration, Muslim separatism and polygamy.¹⁷ The French essayist and literary theorist Tzvetan Todorov told a conference at Columbia University's Maison Française that the riots were the result of dysfunctional sexuality and obsessive machoism among Muslim youths.¹⁸ Hélène Carrère d'Encausse, a French scholar on Russian and Soviet history told the Russian media that the riots were caused by the polygamous marital practices of Muslim immigrants from West Africa, a theory supported by the French Employment Minister.¹⁹

When looking at the 2005 riots two further specificities relating to representations of the *banlieue* emerge more clearly. The first, as the above quote from Mireille Rosello also suggests, the *banlieue* is represented as a highly masculinised space. Women are for the most part excluded from representations of the *banlieue*, unless as victims (an issue which will be dealt in the next section). It is the *banlieue* man that is identified as the problem and most specifically the particular form of *banlieue* masculinity. The other important factor is Islam. It is not simply the immigrant origins of the *banlieue* residents that is identified as a problem but particularly their apparent adherence to Islam. In response to the 2005 riots Muslim leaders were dispatched to appease the rioters. Many academic commentators noted that this was unsuccessful because the rioters did not associate themselves with Islam.²⁰ However, regardless of this fact, the responsibility given to, and taken by, Muslim leaders served to reinforce the riots as a 'Muslim problem'.

(c) Gang rapists and 'Veilers'

The identification of the urban violence of the *banlieue* with a certain (deviant) form of masculinity and Islam is even more clearly elucidated in

¹⁷ Peter Sahlins, 'Civil Unrest in the French Suburbs: November 2005', Social Science Research Council (US) web forum, 24 October 2006 - <http://riotsfrance.ssrc.org/>, accessed 15 November 2006.

¹⁸ Hargreaves, 'An Emperor with No Clothes?' Social Science Research Council (US) web forum, 28 November 2005 - <http://riotsfrance.ssrc.org/>, accessed 15 November 2006.

¹⁹ Ibid.

²⁰ Jocelyne Cesari, 'Ethnicity, Islam and les banlieues: Confusing the issues', Social Science Research Council (US) web forum, 30 November 2005 - <http://riotsfrance.ssrc.org/>, accessed 15 November 2006.

public discourses on another highly mediated series of events involving the *banlieue*; the 'gang rape phenomenon'.

In late 2000, discourses on *les violences urbaines* took a turn and focused on a "new" phenomenon of sexual violence in the housing projects of the *banlieue*. With the release of the film *La Squale*, which depicts a group of young men from immigrant backgrounds who prey upon and gang rape young women in a Paris *banlieue*, the "*tournantes*" became a topic of regular media discourse. The year 2001 brought the first widely publicised criminal trials, and in 2002, the launch of the autobiography of a gang rape victim, Samira Bellil, received intense media coverage. Media and public attention culminated in a number of women's marches throughout France under the banner of a new association which appeared in the public space in February 2003, *Ni Putes Ni Soumises* ('Neither Whores Nor Submissives') who became the new 'voice of (women of) the *banlieue*'. The widespread use of the term '*les tournantes*', a term, which is *banlieue* slang literally translating as 'taking turns', identified the sexual violence as specifically connected with the *banlieue*. The graphic details of girls being subjected to gang rape in the dingy cellars of the dilapidated, vandalised, filthy tenement blocks of the housing estates have remained vivid images within French public imagination.

Aside from the close association of *Ni Putes Ni Soumises* with the issue of '*les tournantes*', its leaders and figureheads were also closely associated with the second 'headscarf affair' which became a source of intense public discourse in 2003. In December 2003 the magazine *Elle* published a petition addressed to Jacques Chirac and signed by a large number of left-wing intellectuals, artists and by the leaders and patrons of *Ni Putes Ni Soumises*, in which it was stated, "To accept the Muslim headscarf in schools and public administration is to legitimise a symbol of the submission of women in places where the State should guarantee a strict equality of the sexes."²¹ Further to this, Fadela Amara, President of *Ni Putes Ni Soumises* in her book of the same name, sets out to describe the situations in which girls in the *banlieue* wear the *hijab*. She concedes that certain girls wear it for religious reasons but notes that it is not always clear

²¹ Nacira Guénif-Souilamas & Eric Macé, *Les féministes et le Garçon Arabe* (Paris: Éditions de l'aube, 2004, p.9: '...Accepter le voile islamique à l'école et dans l'administration publique, c'est légitimer un signe visible de la soumission de la femme dans des lieux où l'État doit être garant d'une stricte égalité entre les sexes.'

whether this religious belief is assumed voluntarily or enforced due to pressure placed by family and religious leaders. Amara goes on to argue that in the context of the *banlieue* the *hijab* has become “like a protective shield against male aggression” for many women and girls,²² who feel compelled to wear it to avoid harassment and the threat of sexual assault. In the words of French sociologist, Eric Macé, who has written extensively on the *banlieue* and the phenomenon of *les violences urbaines*: “...first young people [of the *banlieue*] were equated with thieves; then with the revelation of the gang rapes, rapists; then, with the headscarf controversy, they were ‘veilers’; and now finally they are considered scum that has to be simply scrubbed out...”²³ Macé’s comments astutely highlight the links drawn between criminality, deviant masculinity, sexual violence, misogyny and Islam all of which converge to form the common sense understanding within French popular discourse of the *banlieue*. To be added to this is one further significant feature within representations of the *banlieue*; Islamic fundamentalism.

(d) Islam

A preoccupation with Islamic fundamentalism can be identified in France pre-dating the events of 2001. From his analysis of televised representations of the *banlieue* from 1951 until 1994, Guy Lochard concludes that from 1989 on not only did the *banlieue* receive increasing media attention, it was also increasingly associated with Islamic fundamentalism, as well as the ‘un-integratability’ of certain immigrant groups.²⁴ The expression, ‘*L’Islam des Caves*’, used to describe a form of political Islam closely associated with both the *banlieue* and radicalism, has promoted an image of the *banlieue* as a breeding ground for Islamic fundamentalism. The first real French encounter with Islamic terrorism came in December 1995 with bombings in the Paris Métro allegedly by a young man born in France of Algerian origin.²⁵ However as the journalist and presenter of *Arret sur Images*, a weekly television programme dedicated to auto-critique of the media (similar to the Australian *Mediawatch*), Daniel Schneidermann sets

²² ‘comme une armure censée les protéger de l’agressivité masculine’

²³ Eric Macé, ‘Banlieues: des territoires abandonnées?’ *Le Monde Chat*, 7 November 2005 - <http://www.lemonde.fr/web/chat/0,46-0@2-3226,55-706489,0.html>, accessed 27 November 2006.

²⁴ Lochard *supra* note 5, p.39, see also Daniel Schneidermann, *Le Cauchemar Médiatique* (Paris: Éditions Denoel, 2003), p.28.

²⁵ Cesari, *supra* note 20.

out in his book, *Le Cauchemar Médiatique*, since the events of 9/11, “the battle against Islamic terrorist groups is a subject of periodic sensationalisation.”²⁶ Schneidermann goes on to provide an example; shortly after 9/11, one of the main national television networks, France 2 reported a rumoured threat of a helicopter attack on the United States Embassy in Paris by Islamic terrorists.²⁷ Furthermore, he reports a linking of Al Qaida, Islamic fundamentalism and the ‘*malfrats des cites*’ (‘miscreants of the housing projects’) within televised news reports, resulting in the formation of what he describes as, “a united group of little devils who pose a silent daily threat to France.”²⁸

If it is accepted that the *banlieue* has been constructed as a space dominated by immigrants, violence, misogyny and Islamic fundamentalism, the next question, which must be asked is why? What is the significance of the *banlieue* as a site of chaos and the discourses on ‘reclaiming’ the *banlieue* through law and order and ‘cleansing’, promoted by politicians and widely reported within the media in France? Furthermore, if discourses on the *banlieue* are indeed about ethnicity, immigration and Islam, then why does it need to be done through such an indirect means? It is suggested that a possible explanation may be found through an interrogation of the principles underlying the French construction of national identity and its policy of integration.

PART TWO: FRENCH REPUBLICAN VALUES & INTEGRATION

(a) The myth of the ‘Old and Static Nation’

In contrast to many other European nations, which have transformed from countries of emigration to countries of immigration (see for example Italy), France has long been a receiving country, with large-scale immigration dating back to at least the middle of the nineteenth century. However, immigration has generally been excluded from France’s imagined national identity. Instead, France has seen itself as an old and static nation with the role of migrants seen only in terms of fulfilling economic needs, in part due

²⁶ Schneidermann, *supra* note 24, p.27: ‘la lutte contre les groupes terroristes islamistes est un sujet périodique d’emballement.’

²⁷ Schneidermann, *supra* note 24, p.28.

²⁸ Ibid: ‘un groupe homogène de diabolins, qui font danser les Français une sourde menace quotidienne.’

to low birth rates in France compared to other European nations.²⁹ Alec Hargreaves explains this erasure in terms of the relatively early establishment of the French state compared with other parts of Europe. In this way, the founding myths on which French national identity has been built pre-dated the waves of major immigration,³⁰ and are particularly tied up with the identification of 'Republican values' as providing the core to the French nation.

These founding myths have also impacted upon French conceptions of nationality and citizenship. In contrast with, for example Germany, which has based its construction of national identity on an ethnic concept of nationality, France has based its nationality and citizenship laws on a principle of socialisation, not ethnic origin.³¹ Through reliance on French republican values, French academic, political and other public discourses have preferred to rely on the language of equality through the sameness of 'being French' than through recognition of difference. This has led to a general disdain for the language of 'multiculturalism' and 'ethnic relations' which are seen as Anglo-Saxon imports inappropriate to the French context.³² Rather, France has followed a policy of integration, based upon a theory that, "In France, once you're French, you're French and that's it".³³ As Schnapper, Krief and Peignard put it; "The main implicit principle of the French republican model of integration is that the lack of a specific integration policy is the best way to integrate migrants, as they are simply considered as French citizens."³⁴ National identity and belonging in France has been constructed around the ideal of fostering shared cultural values, through adherence to Republican principles and equal access to core institutions, such as the unified national education system.³⁵

²⁹ Pontus Odmalm, *Migration Policies and Political Participation: Inclusion or Intrusion in Western Europe?* (Basingstoke, England: Palgrave MacMillan, 2005), p.19.

³⁰ Hargreaves, *supra* note 1, pp.4-5.

³¹ Heckmann, *supra* note 2, p.9.

³² Rinaudo, *supra* note 7, p.7, Hargreaves, *supra* note 1, p.2.

³³ Tribalat quoted in Valérie Orlando, 'From Rap to Rai in the Mixing Bowl: Beur Hip-Hop Culture and Banlieue Cinema in Urban France', *Journal of Popular Culture*, Vol. 36, No. 3, Winter 2003, p.398.

³⁴ Cited in Heckmann, *supra* note 2, p.11.

³⁵ *Ibid*, p.8, Odmalm, *supra* note 29, p.25.

(b) The Reality of Integration

The reality has not however reflected the principle. For a start, the myth of a unified, cohesive nation masks the forcible erasure of regional identities in France, a fact which has not been without a sense of loss, as the assertion of minority cultural rights in regions such as Brittany demonstrate. In addition, throughout France's long history of receiving immigrants a resistance to the integration of *étrangers* (foreigners) has been documented. While currently most anti-immigration discourses in France, as with elsewhere in Europe, concentrate on non-European immigrants (particularly from North Africa), due to the perception that they are culturally incompatible (an idea that will be further interrogated later in this paper), these discourses have not always been limited to those external to Europe. Rather, in a sense they seem to accompany whichever is the dominant migrant group at the time. Initially the majority of immigrants to France came from other European nations, particularly Belgium, Southern Europe and (in the inter-war years) Poland. Michel-Louis Rouquette, in his book *La chasse à l'immigré: Violence, mémoire et représentations*, describes events in the late nineteenth century in Aigues-Mortes, a town in the south of France, which led to rioting and the murder by a mob of approximately 50 Italian immigrant workers, due to the perceived threat they posed to the local French community.³⁶ In the inter-war years, anti-immigration discourses focussed on the 'unintegrability' of Italians into France due to their Catholic beliefs³⁷ and criticism was levelled by many politicians in the 1930s against the Polish immigrant population in France for their failure to integrate and religious practices which were seen as incompatible with the French Christian tradition.³⁸

In this context, the current focus in French popular discourse on immigrant communities from the Mahgreb is not surprising, when it is noted that this has been quantitatively the most significant migrant group in France since the 1950s.³⁹ Furthermore, as Hargreaves also points out, the attacks on Italians in the late nineteenth century coincided with a period of economic

³⁶ Michel-Louis Rouquette, *La chasse à l'immigré: Violence, mémoire et représentations* (Paris: MARDAGA, 1997).

³⁷ Catherine Wihtol de Wenden, in Hargreaves & McKinney, *supra* note 15, p.99.

³⁸ Gérard Noiriel, *Atlas de l'Immigration en France: Exclusion, intégration* (Paris: Éditions Autrement, 2002), p.53.

³⁹ Hargreaves, *supra* note 1, preface, xvi.

downturn. With the most significant waves of immigration from the Mahgreb coinciding with a slowdown in economic growth, the climate of hostility can in part be explained by a general fear within certain sectors of French society regarding the security of their access to employment and economic and social mobility.

However, racism and colonialism cannot be excluded from the equation. The rhetoric of social rather than ethnic citizenship has not avoided the division in France between "the real French" ("*les Français de souche*") and the "foreigners" ("*les étrangers*") or "immigrants", terms which are also used to refer to French citizen children of immigrant origin and French citizens of the DOM-TOM ("*Département d'Outre-Mer*" and "*Territoires d'Outre-Mer*", the remaining French territories outside of the French mainland).⁴⁰ Political citizenship and adherence to French cultural values has been not demonstrated to be sufficient to overcome the distinction made on somatic differences. An example of this is provided by Amara, an anti-racism activist of Algerian origin, president of the *Fédération nationale des Maisons des Potes* and of the feminist association *Ni Putes Ni Soumises*, who remembers that;

It was in the cradle of the Republic - the school of my childhood - that I felt for the first time that I was an *étrangère* (foreigner/outsider), the day when one of the teachers wanted to count the foreign students and, certainly thinking she was doing the right thing, asked me to raise my hand. And yet, according to the laws passed under the Evian Accord, I had French citizenship.⁴¹

Amara's identification of the school as the 'cradle of the Republic' is not incidental. As noted above, one of the foundations upon which French integration policies have been built is an emphasis on the core institutions of a unified national school system and secularism.⁴² While Amara clearly subscribes to these principles (as detailed in both the previous and the next sections), her continued identification as an *étrangère* demonstrates the reality that true integration is not considered possible for certain groups

⁴⁰ Ibid, p.32.

⁴¹ Fadela Amara, *Ni Putes Ni Soumises* (Paris: La Découverte, 2003, p.19: '...c'est dans le creuset de la République - l'école de mon enfance -, que j'ai véritablement senti pour la première fois que j'étais une étrangère, le jour où une institutrice voulant recenser les élèves étrangers, et pensant certainement bien faire, m'a demandé de lever la main. Et pourtant, selon la loi issue des accord d'Évian, j'avais la nationalité française.'

⁴² Heckmann, *supra* note 2, p.8.

within the French national space.

Similarly, the failed reality of France's integration policy appears to have been illustrated in the social and economic marginalisation of *banlieue* communities where, as noted in the previous section, immigrant populations have been disproportionately represented. While the housing projects of the *banlieue* were initially intended to provide low cost housing which could be used as a springboard for the working classes during a time of great economic growth, the economic downturn in the 1970s and increased unemployment established the *cités* as a permanent reality for their residents. This coincided with the settlement of first or second generation immigrants in these areas, following the dismantling of the *bidonvilles* (shanty towns) and transit centres initially set up for migrant workers who were ultimately expected to return home. As Jocelyne Cesari writes; "...immigrant families gained access to government-sponsored housing at the very moment when it became no longer a symbol of progress, but instead a trap for working-class families who did not have the financial means to leave".⁴³ Furthermore, due to the combined reality of racism against non-European immigrants in France and the stigma associated with the *banlieue*, the opportunities to leave have steadily decreased creating permanent sites of marginalisation for immigrant communities.

So why is there this divergence between the rhetoric and the reality of integration? The most oft-cited reasons for France's failure to integrate its immigrant communities, particularly those from the Mahgreb are the new immigrants' apparent reluctance or even incapacity to integrate due to the incompatibility of their cultures and religion (Islam) with democratic Republican principles. The examples of Islam's opposition to secularism and the negative treatment of women versus Republican egalitarianism are often used to illustrate this basic incompatibility. The next section of this paper will therefore interrogate these Republican values, through which integration is meant to be possible.

(c) The Paradoxes of 'Republican Values'

⁴³ Cesari, *supra* note 20.

This belief in the unwillingness of certain immigrant communities to be integrated is in stark contrast to the findings of sociological research. Scholars such as Jonathan Laurence and Justin Vaisse have documented a high level of cultural integration among second and third generation immigrants in France, particularly those of Maghrebin origin. They found that Muslim immigrant communities in France predominantly speak French, are open to inter-marriage, adhere to French cultural values and norms and have birth rates which increasingly mirror white French birth rates.⁴⁴ However, it is in terms of social and economic mobility that immigrant communities have had success: "If [open policies towards naturalisation] and other aspects of general integration can be seen as tendency toward the goal of "integration" or acculturation, housing policy seems to totally run counter to this goal. It clearly leads to a marked pattern of segregation."⁴⁵ As the *Beur* movement of the 1980s and subsequent pushes in the area of anti-discrimination have demonstrated, it is not through active attempts to maintain other cultural or national affiliations that, particularly second and third generation immigrants remain outside French society. Rather, the problem has been the wide-scale social and economic exclusion and stigmatisation of residents of the *banlieue*, particularly (although not exclusively) those of immigrant origin.

This would appear to lend weight to John Crowley's argument that, in direct contradiction to popular belief, anti-immigration and racist discourses emerge in response to the integration of immigrant communities rather than their failure to integrate. Crowley argues that it is not the *presence* of immigrants but rather their *place* that is the source of insecurity, which fuels these discourses. In the French context, while active recruitment of labour from the colonies began in 1916 and particularly following World War II, large numbers of immigrants from France's North African colonies were brought over as manual labour to assist with the extensive post-war re-construction, these migrants were seen as a temporary solution to a labour shortage. In contrast to active attempts to attract European family immigration to boost French demographic recovery, the colonial migrant workers were actively discouraged from bringing their families, through the provision of hostel-type accommodation. It was largely expected that the migrant workers would ultimately return home, similar to the German

⁴⁴ Laurence & Vaisse, *supra* note 2.

⁴⁵ Heckmann, *supra* note 2, p.11.

experience with the *gastarbeiter*, or 'guest workers' and far from attempts being made to integrate them into French society, they were kept external, in a similar manner to during colonialism albeit this time on the French mainland.

However, despite various attempts from the 1960s on to ensure this continued externalisation through attempted bans on family reunification (which was deemed unlawful by the *Conseil d'Etat*, the highest administrative court in 1974) and a policy of repatriation introduced in 1977 and the declaration of an 'end to immigration' in the 1980s, these migrant workers have become a permanent part of the French population. Their geographical and social exclusion was possible while they remained simply a manual labour force, with limited access to or need for French social institutions. With the arrival of families came the first proper contact with the broader French society and an increased visibility within the public sphere, where they were considered to pose a threat through their accessing of French resources and core institutions.

In light of this history, French republican universalism must be juxtaposed with its adherence to colonial ideology:

[t]he ideology of colonial domination was built on the alleged inferiority of non-Europeans. The widespread view that colonized peoples differed from the French to a far greater degree than Europeans helped to underpin the colonial system, and was reinforced by it in turn.⁴⁶

Thus, previous difficulties with integrating other European immigrants are downplayed and, regardless of the reality, the incompatible, usually backward, cultural practices of non-European immigrants are identified as restricting the possibility of these immigrants ever being completely absorbed into French society.

Closely tied to this discourse is the issue of Islam. As set out in the previous section, Islam in France has been problematised through discourses on the *banlieue* in a manner similar to other parts of the world and influenced by global events. However, the problematisation of Islam has a longer history than this. Since the time of the crusades, Islam has been viewed as a threat to Christian Western Europe. The construction of the debauched Arab

⁴⁶ Hargreaves, *supra* note 1, pp.153-154.

appears often in European colonial literature, art, political and academic discourse.⁴⁷ France's colonial enterprise brought significant contact with the Muslim world, resulting in representations of Islam and the Muslim being particularly prevalent. In the words of Nacira Guénif-Souilamas, “[a]lready in the glorious period of the colonial Empire, the Arabs were seen as perverted, a perversion tolerated by their religion, intrinsic in their moral code, transmitted and inherited.”⁴⁸ She goes on to identify how many of these stereotypes can also be seen in current constructions of the young Muslim men of the *banlieue*.

France also subscribed strongly to the defensive colonial discourses of the ‘civilising mission’, which constructed the local population as inherently inferior and in need of managing. In particular the tool of *laïcité* was drawn on as means of establishing and maintaining colonial order.⁴⁹ Drawing on this colonial history, it becomes less surprising that within current popular discourses, the main obstacle to integration is often cited to be Islam, which is cast in direct opposition to the cherished Republican value of *laïcité* (secularism). This perceived opposition is not specific to France, as the Danish cartoon controversy has illustrated. However, as Ruth Mas identifies, through the use of *laïcité* as a form of domination in the French colonial enterprise, Islam became a potent symbol of subversion, resistance and dissent, particularly in the Algerian war.⁵⁰ In this context, the alleged battle between Islam and *laïcité* so often referred to in French popular discourse can be perhaps better viewed in terms of an exercise of (post-)colonial reassertion of dominance than a true case of irreconcilable opposites.

Furthermore, France more than other European nations has attempted to eradicate all connection between its Christian tradition and its construction of statehood. Indeed, as Mas articulates, while great emphasis is placed on

⁴⁷ As detailed by Edward Said in his classic work, *Orientalism* (London: Penguin, 1995).

⁴⁸ Guénif-Souilamas & Macé, *supra* note 22: ‘Déjà, à l’époque glorieuses du centenaire de l’Empire colonial, les Arabes sont vus comme des pervers, une perversion tolérée par leur religion, inscrite dans leurs moeurs, transmise et héritée’.

⁴⁹ For example, Ruth Mas describes how citizenship was denied to Muslims – Ruth Mas, ‘Compelling the Muslim Subject: Memory as Post-Colonial Violence and the Public Performativity of « Secular and Cultural Islam »’, *The Muslim World*, Vol. 96, October 2006, p592.

⁵⁰ Ibid. See also the example of the wearing of the veil by Algerian women in Moussa Khedimellah, ‘Corps et inconscient collectif voilés: Enjeux de la similitude et de l’altérité’, *Cosmopolitiques*, Vol. 6, March 2004, p.79.

the 1905 law secularising the education system and its reduction of the influence of the Catholic Church in France, the various exceptions to and derogations from that law have generally not been given such primacy. As a result, “[t]he history that brought the Church under state patronage for most of the 19th century and the continuing influence that both this history and the Catholic Church have on public discourse, law and society in France is most often ignored”.⁵¹ Thus, while secularism has provided a central feature in discourses on integration to the point that there has been a strong push within French ethnic minority and immigrant communities to identify themselves as ‘secular Muslims’, when seen in context France’s commitment to secularism has not always been so clear cut nor innocent.

A final point worth noting is that the Republican myth of French egalitarianism is also in stark contrast with the reality of exclusion from access to political rights which impacted not just on members of the former colonies, but up until 1944 on the entire French female population. Indeed, the very concept of Republican citizenship based on egalitarianism is paradoxical as initially active citizenship remained the domain of the wealthier male sections of French society. This justifies a certain scepticism when “Republican feminism” is used in relation to discourses on immigrant communities and Islam.

PART THREE: THE *BANLIEUE* – BEYOND INTEGRATION?

So what is the significance of Republican values and their paradoxes to consideration of the *banlieue*? As identified above, the Republican model on which French national identity has been constructed is interpreted as rejecting the language of difference (ethnic, religious or gender) in favour of affirming equality through citizenship and shared cultural values. However, as the first part of this paper demonstrated, representations of the *banlieue* have been intricately woven with ethnicised, Islamicised and gendered imagery suggesting that while official rhetoric prohibits the identification of difference, in reality it is a central source of concern. At the same time, the *banlieue* is not simply an indirect manner of debating ethnic or religious diversity through the employment of a neutral geographical space. An analysis of the representations also highlights the *banlieue* as a highly charged environment, associated with criminality,

⁵¹ Mas, *ibid*, p.590.

misogyny, intolerance, religious extremism and violence. Thus, concern about the impact of ethnic and religious diversity and immigration on the mythical cohesive nation become inextricably intertwined with fears regarding the threat to physical security and social stability.

The use of the language of 'threat' to describe immigrants is not new, nor is it limited to France.⁵² The French Right, as with many right-wing political parties throughout Europe, has drawn on this image and, along with re-asserting the "positive aspects of colonialism",⁵³ affirmed the fatalistic view of the 'unintegrability' of certain (backward, uncivilised, non-European) cultures. Meanwhile the Left has responded in terms of re-establishing Republican order in relation to the poorly integrated, badly socialised citizens of the *banlieue*.⁵⁴ However, what is clear across the French political spectrum is the unquestioning adherence to Republican principles. This has also been the case within much of the anti-racism movement. While Mas identifies this in relation to her deconstruction of the 'Secular Muslim' identity currently being negotiated in response to Islamophobia and racism in France, this paper will now look at the example of *Ni Putes Ni Soumises*, the association which has emerged as a major player in discourses on the *banlieue* in recent times.

Ni Putes Ni Soumises – 'The New Voice of the Banlieue'

After great success in the 1980s, the *Beur* anti-racism movements appear to have lost mainstream French interest. *SOS Racisme*, which had emerged as the strongest force, has essentially disappeared from the public domain. By way of contrast, since its launch in 2002 the association *Ni Putes Ni Soumises* has received ever increasing media and political attention and features heavily in public debate on ethnic relations and *banlieue* issues. Indeed its launching march, the *Manifestation de la Journée des Femmes* on 2 Mars 2003 was used as a parallel to the highly successful 1983 March for Equality and against Racism (dubbed the '*Marche des Beurs*'). Whilst starting out with a general anti-racist, anti-sexist agenda identifying

⁵² For a detailed account of this phenomenon with particular emphasis on the experience in Greece and Italy see Anastasia Tsoukala, 'Looking at Migrants as Enemies' in Bigo & Guild, *supra* note 8, pp.161-192.

⁵³ For more on this and the relationship between colonial discourses on the 'civilising mission' and current discourses on the management of Islam in France see Mas, *supra* note 48.

⁵⁴ Peralva and Macé, *supra* note 7, pp.21-23.

practical issues such as education, employment and support services, in reality *Ni Putes Ni Soumises* has focused on addressing the issue of sexist violence within the *banlieue*, perpetrated by *banlieue* men.

This is not incidental. In a television discussion on France 5 in 2005, Loubna Méliane, a representative of the association, stated that attempts had been made for a period of three years prior to the launch of the association and the march. She stated that they had received little interest from the media or social services on the basis that, "they said that there weren't problems with the girls [of the *banlieue*] – they did well in their studies and all was going well. It was rather with the boys that there were problems."⁵⁵ It was only after the launch of Samira Bellil's autobiography in which she describes her experiences as a victim of the *tournantes* and the highly mediatised death of Sohane, a young woman burnt alive in the basement of a block of flats in a Parisian *banlieue*, that the movement attracted sufficient support. The leaders of the march were subsequently received by Jean-Pierre Raffarin with 3 other ministers at Matignon. Arguably; this 'voice of the *banlieue*' was only worthy of interest when it allowed for the further condemnation of young *banlieue* men.

It is also important to note that *Ni Putes Ni Soumises*' main platform has been the condemnation of violence and discrimination suffered by women in the *banlieue* through the reinforcement of Republican values. In particular, the association has closely allied itself with the French socialist party and with notable French republican feminists and declared a strict adherence to *laïcité* and equality between the sexes. The association has also been very vocal in its criticism of Islam. In her book about her experiences as a victim of '*les tournantes*', Samira Bellil does not explicitly refer to Islam or ethnicity as a direct factor in the rapes; however, a connection is implicitly made. In the preface to Bellil's book, the journalist Josée Stoquart states:

It seems that within these areas, euphemistically called, "sensitive", where the majority of the families are of immigrant origin, it is difficult to situate a place for the woman. Certain young men are pulled between the strict discipline of their cultural origins (religious fundamentalism, the untouchability of the

⁵⁵ *Arret sur Images*, France 5, 27 March 2005 – 'ils ont dit qu'il ne y avait pas de problèmes avec des filles - elles russissent dans leurs études, tout va bien, c'est plutôt avec des garçons qu'il y avait des problèmes'.

woman, polygamy) and a cultural environment which is heavily eroticised...These adolescents have no point of reference and are not conscious of the gravity of their actions. For them, 'la tournante' (gang rape) is a game and the girls, the objects.⁵⁶

Thus, in her apparent attempt to find explanations for the phenomenon of *les tournantes*, Stoquart identifies the problem as one specific to the *banlieue* (also referred to in French as '*les quartiers sensibles*') and linked directly with ethnicity and Islam. This link was also made by various spokespeople for *Ni Putes Ni Soumises* around the time of the 2003 march. In an interview with the left-wing newspaper, *Libération*, Bellil was quoted as stating she would never go out with a *Beur*: 'With anyone else, fine, but not with someone of my own culture! They're either religious (fanatics) or scumbags.'⁵⁷

Similarly, Amara in writing about the *hijab* in the *banlieue* both stresses her commitment to secularism ('I, who places great value on fundamental freedoms, think that the religious practice is legitimate when it is freely chosen, without pressure or constraint, but above all when it is done in accordance with respect for the communal rule which is *laïcité*.'⁵⁸) and identifies the *hijab* as first and foremost a symbol of female oppression. She is dismissive of women she refers to as the 'green (Islamic) fascists'⁵⁹ who assert a feeling of liberation through wearing the *hijab* and argues that these women are in fact 'dangerous to democracy'.⁶⁰

⁵⁶ Samira Bellil, *Dans L'Enfer des Tournantes* (Paris: Denoël Impacts, 2002), Preface: 'Il semble que dans ces quartiers que l'on dit pudiquement 'sensibles', où la majorité des familles est issue de l'immigration, il soit difficile de donner sa place à la femme. Certains jeunes sont pris entre le rigorisme de leurs origines culturelles (intégrisme religieux, intouchabilité de la femme, polygamie...) et un environnement culturel très fortement éroticisé...Ces adolescents n'ont plus aucun repère et ils n'ont pas conscience de la gravité de leurs actes. Pour eux, la "tournante" est un jeu et les filles, des objets.'

⁵⁷ Luc Le Vaillant, 'Profil- Samira Bellil', *Libération*, 7 October 2002, quoted in Benabdessadok, Chérifa, 'Ni putées ni soumises: de la marche à l'université d'automne', *Mouvements*, Vol. 1248, March-April 2004, p.67: 'Avec toute la terre d'accord, mais pas avec quelqu'un de ma culture! C'est soit un religieux soit une racaille'. It is interesting to note that Bellil also uses the term 'racaille', used by Nicholas Sarkozy, Minister for the Interior in his controversial 'cleaning the *banlieue*' statement.

⁵⁸ Amara, *supra* note 40, pp.47-48: 'Moi qui suis très attachée aux libertés fondamentales, je pense que la pratique religieuse est légitime quand elle est librement choisie, sans pression ni contrainte, mais surtout quand elle s'inscrit dans une démarche de respect de la règle commune qu'est la laïcité.'

⁵⁹ 'les soldates du fascisme vert'.

⁶⁰ Amara, *supra* note 40, p.48.

The intense publicity *Ni Putes Ni Soumises* has received has had two major consequences. The first is the further association of Islam with the *banlieue*, through the conflation of *banlieue* women and Muslim women. In one of many examples, a discussion on Muslim women's sexuality on the French television channel *Arte* on 8 February 2005 featured representatives from *Ni Putes Ni Soumises* as *banlieue*/Muslim women. Furthermore, the most visible faces of the organisation are women of Mahgrebin origin; in particular Bellil, the now deceased patron of *Ni Putes Ni Soumises* and famous survivor of gang rape and Amara, the President of the Association who is of Algerian descent. The second has been, through the association's often highly critical stance on Islam and its vocal support for the *hijab* ban, a reinforcement and perpetuation of the links currently drawn within French popular discourse between sexism, violence, Islam and the *banlieue*.

As a result, a number of academics and activists have been deeply critical of the association. As Nacira Guénif-Souilamas and Eric Macé argue, *Ni Putes Ni Soumises* has done little to challenge the racist and stigmatised representations of the *banlieue*. Instead, the association has further justified colonialist and racist discourses on the "Arab"/Muslim and reinforced French patriarchal order. Certainly, the association seems to have done little to address the fact that representations of *banlieue* women are reduced to one of two positions; that of victim or of pawn of male domination. Activist with the association, "*Femmes françaises et musulmanes engagées*" ('French women and active Muslims') and co-author of the book *L'une voilée, l'autre pas* ('One veiled, the other not'), Saida Kada describes how in the national left-wing newspaper, *Libération* she was accused in wearing the *hijab* of being, 'an accomplice to masculine domination and thus to gang rapes and other acts of barbarism'.⁶¹ She also quotes a journalist from the local left-wing feminist newspaper, *Lyon Femmes* who stated, 'the headscarf and the gang rapes come from the same contempt for women'.⁶²

By remaining within the paradigm of Republican values, *Ni Putes Ni Soumises*' attempts to address the issue of discrimination and violence against immigrant/*banlieue* women has been limited to that perpetrated by "their own" men. The *banlieue* is re-affirmed as a site of intersection between violence, misogyny, immigration and Islam thereby justifying its

⁶¹ Dounia Bouzar & Saida Kada, *L'une voilée, l'autre pas* (Paris: Éditions Albin Michel, 2003), p.145: 'complice de la domination masculine et donc des viols collectifs avec actes de barbaries'.

⁶² Ibid: 'le foulard et les viols collectifs relèvent du même mépris pour les femmes'.

residents' continued marginalisation. So too, the blind adherence to Republican values without situating them within the context of France's colonial and racist past, the continued pre-eminence of dominant patriarchal order and current anti-immigration and Islamophobic trends allows for the reinforcement of dominant hegemonic identity and power structures.

CONCLUSION

While official French rhetoric seeks to efface all racial and ethnic distinction, an analysis of representations of the *banlieue* demonstrate that indirectly through this highly problematised and stigmatised site, it is exactly issues of ethnicity and cultural diversity and their impact on mythical constructions of nationhood that form a central concern within French popular discourse. In this way, rather than France being distinct from other European nations, it can be seen to be caught up in many of the same struggles with managing the perceived threat posed by ethnic minorities and immigration to the constructed cohesion of French national identity. This is only made more complicated by France's deep implication in European colonialism.

While the popular understanding is that the *banlieue* represents a site of failure of French integrationist policies, I argue that it in fact provides a far more important stabilising force. It is true that the *banlieue* is a site of conflict between dominant French hegemonic order and marginalised communities. However, through the subtle, indirect conflation of the *banlieue* with, on the one hand immigrant communities and Islam, and on the other, violence, criminality, extremism and intolerance and misogyny, this unintegrated zone is legitimated. Indeed, the need for the *banlieue* and its residents to remain outside of French constructions of national identity and power structures is justified as to integrate it would be to allow negative influences to threaten 'good French order'. A closer look at the issues underlying the problematisation of the *banlieue* and most particularly its residents of immigrant, particularly North African Muslim origin, demonstrates that the cause of many of the problems can be found within the inherent contradictions in mythical Republican values. However, the legitimacy of these values is rarely interrogated and is accepted even within the anti-racist movement as providing the only possible basis for French constructions of national identity and national belonging. In this way, rather than the *banlieue* representing a weakness or a threat, it provides a useful

means of reinforcing the myths upon which dominant hegemonic identity is built in France.

At a time when most European nations are struggling with their growing immigrant and ethnic minority communities and the re-assertion of the myth of homogenous national identity and the relationship between Europe and Islam both within and outside its borders is a source of intense debate, consideration of the French example provides an opportunity to identify similarities and differences with the broader European experience.

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