At first glance, a juxtaposition of French and American history may seem arbitrary and unproductive. One is an old European country with more than a thousand years of continuous existence; the other a much newer one formed by the European settlement of North America and constituted as a nation scarcely two centuries ago. To avoid turning an historical comparison between France and the United States into a mere set of contrasts, it is necessary to begin with some underlying similarities.

First and most obviously both France and the United States revolted against kingly rule to establish republics in the late eighteenth century.¹ In the process, they became the world’s first nation states of substantial size based on popular sovereignty and government by consent. By abolishing or prohibiting nobility as well as
monarchy they created a presumption of legal and political equality for all citizens. The Declaration of Independence and *les droits de l’homme* set forth the principle that merely being human entitles individuals to basic natural rights. The kind of nationalism that developed to defend these radical political projects is usually categorized as “civic” or “territorial” nationalism, as opposed to the “ethnic” or “organic” type that developed in nineteenth century Europe, especially in Germany.\(^2\) The civic type meant that, in theory at least, one belonged to the nation simply by being there and being human; membership in the ethnic type required the right ancestry or “blood.” But as Anthony D. Smith has pointed out, all nations have combined “ethnic solidarity” and “political citizenship,” albeit in differing proportions.\(^3\) Whatever cultural or ethnoracial identities were implicitly or explicitly endorsed in the two societies, the theory promulgated to justify the revolutions and subsequent egalitarian reforms was a universalistic conception of citizenship as the embodiment of natural or human rights. But because of its association with a nation state citizenship was necessarily a bounded concept, and establishing qualifications for full membership in the polity as potential voters and officeholders would open the way to particularistic standards involving age, gender, place of birth, and (sometimes) parentage or ethnoracial ancestry.

A second common feature, which clearly brought race to the fore, was the involvement of both France and the United States in the involuntary transportation of Africans to the Americas and their employment as slaves on the plantations of the Caribbean and the American South. In the period just before the revolutions of the 1790s in France and Haiti, plantation slavery and the transatlantic trade associated with it constituted the most profitable and dynamic sector of the French economy. After the loss of Haiti, it declined in
significance, but the planters of Martinique, Guadeloupe, and Bourbon (La Réunion) were able to resist abolition or even significant reform until the Revolution of 1848 unexpectedly put opponents of slavery into power. North American slavery appeared to be in some trouble at the time of the Revolution, principally because of the collapse of the tobacco market upon which the profitability of slavery in the Chesapeake region depended. But the relatively prosperous rice and long-staple cotton growers of South Carolina and Georgia would not have joined the union had their interests been unacknowledged and unprotected. Subsequently, the rise of short-staple cotton production in the expanding Deep South of the early nineteenth century made the planter class so affluent and politically powerful that it took a bloody civil war to bring about the abolition of slavery. The long association of black people with a form of servitude never imposed on whites would encourage the belief in both countries that blacks were servile by nature and therefore incapable of being the self-governing citizens of a republic. Set in motion was a long-lasting conflict between the universalism of the republican ideology and beliefs about the natural capacities of blacks.

The third common element on which comparison can be based is immigration. Unlike other European nations, France has been a country of immigration rather than emigration and has at times resembled the United States in the proportion of its population recruited from foreign sources. Because of low birth rates and the extent to which the peasantry remained rooted to the soil, France in the late nineteenth and early twentieth century had to recruit much of the labor for its industrial revolution from other countries. Like the American immigration of the same period, the principal sources were southern and eastern Europe, especially Italy and Poland. The time of greatest
influx was not exactly the same, however. American immigration from Europe peaked between 1900 and 1910, whereas the high point for France was the 1920s. The French manpower losses in the war created an acute labor shortage, and America’s new policy of immigration restriction made France a more feasible destination than the United States for work-seeking Poles and Italians. In the period since the 1960s, both countries have seen new waves of immigration, mostly from non-European sources, and similar questions have been raised on how best to integrate or accommodate these recent arrivals. Hostility to immigrants, whether of European or non-European origin has been a recurring phenomenon in both countries. Because it may be based primarily on cultural intolerance rather than biological racism, a useful term for such an attitude is “nativism,” the term employed by the late John Higham in his classic study, Strangers in the Land.

The fourth common element is a history of national expansionism involving the conquest, subjugation, and (in some instances) assimilation of other peoples. The last stage of this expansionism was the establishment of overseas colonies that eventually became independent rather than being annexed to the metropole. The creation of Modern France through expansion goes back to the establishment of a small kingdom in the area around Paris in the late tenth century and was not completed until the incorporation of Nice and Savoy in 1860. The existing “hexagon” was the result of a long series of wars and conquests involving the triumph of French language and culture over what once were autonomous and culturally distinctive communities. The assimilation of Gascons, Savoyards, Occitans, Basques, and others helped to sustain the myth that French overseas expansionism in the nineteenth century, especially to North and West Africa, was a continuation of the same assimilationist project. But a variety of
circumstances, including the cultural and racial prejudices of the colonizers, impeded the transformation of Arabs and Africans into Frenchmen and put them on the path to national independence.

American expansionism before the end of the nineteenth century took the form of a westward movement that, despite some rhetorical gestures in the direction of assimilation, displaced rather than incorporated the indigenous Indian populations. The Spanish-speaking inhabitants of the territories wrested by force from Mexico in the 1840s were granted citizenship under the treaty that ended the Mexican-American War but excluded from effective power even in the areas where they predominated. With the acquisition of Puerto Rico and the Philippines after the Spanish-American War, the United States acquired its first overseas colonies, thus following the example of France and other European powers. As in the case of France, a prior history of conquering contiguous territories to enlarge the national domain influenced the character and ideology of the new imperialism.

Having established the broad commonalties on which a comparison can be based, we will now look for the differences that appear when we move from the general themes to their specific applications. Both nations have proclaimed themselves to be republics, but their conceptions of republicanism have differed significantly. From the tradition of absolute monarchy, the French revolutionaries inherited the concept of a centralized unitary state, with the critical difference that it should now reflect the general will as manifested in an elective national assembly rather than the particular will of the ruler. The belief that there should be no intermediaries between the individual and the sovereign state was basic to French revolutionary thought. The American republic, on the other hand, began as the
cooperative struggle of thirteen British colonies, each with a distinctive history and relationship to the crown, for independence from the mother country. During and immediately after the Revolutionary War, the states, as they were now called, functioned as a loose confederation. Although the Constitution of 1787 established a stronger central authority, it divided sovereignty between the federal government and the states in a manner that made no more sense to the French than French centralization and étatism made to the Americans.

John Adams found Turgot’s classic dictum that “all power should be one, namely that of [single] nation” to be “as mysterious as the Athanasian creed.” In the American republican ideology a strong central state was viewed as a threat to liberty, because it could fall into the hands of corrupt or power-hungry men. For French revolutionaries, who were seeking to destroy strong pre-existing hierarchies based on birth and obliterate the remnants of feudalism, the prime objective was the guarantee of individual equality that could only be provided by a powerful state acting uniformly on all citizens. Although liberty and equality were affirmed in both revolutions, the priority was given to the former in the American case and to the latter in the French.

A second difference that was there from the beginning and has persisted to the present day is the role that religion is expected to play in the public life of the nation. The French revolution was animated by a fierce anticlericalism directed at the association of the Catholic Church with the ancien régime. The principle of laïcité, the ban on affirming religious identities in public space, can be understood in part as a defensive reaction to the Catholic Church’s long-standing opposition to the republic and its support for a monarchical restoration, dispositions that lasted until well into the twentieth century. The fact that a powerful, centralized, and
internationally supported religious body could retain the adherence of a majority of the French people and still be at odds with the political principles of French republicanism created a contentious situation with no American analogue. American separation of church and state developed in the context of a basically Protestant religious pluralism. Since no single denomination could claim national predominance and movements for disestablishment and religious tolerance were developing in several states, it is not surprising the Founding Fathers of 1787 decreed a separation of church and state that implied no hostility to religion. Consequently expressions of a generalized, non-denominational theism—originally Protestant in inspiration but later broadened to cover the beliefs of Catholics and Jews—have a place in public discourse and patriotic ritual in the United States that they clearly do not have in France.

Paradoxically, however, a need to come to terms with the power and popularity of the Catholic Church has forced French republican regimes to associate themselves with the church in ways that would violate American conceptions of church-state separation. Between its creation in 1870 and the full disestablishment of religion in 1905, the officially secular Third Republic paid the salaries of Catholic priests and held title to church property. Religious neutrality was maintained by also paying salaries to ministers and rabbis. Even today the state provides direct aid to religious schools, and official, government-subsidized bodies negotiate with the state on behalf of religious communities. Earlier this year, Moslems gained the right to elect a council empowered to make representations to the state, a privilege previously granted only to Catholics, Protestants, and Jews. America’s tradition of religious tolerance and pluralism has for the most part precluded direct government support of religious activities (except in
the form of tax exemptions), while French laïcité has found a place for
the official recognition and empowerment of religious communities,
which are regarded as corporate entities over which the state feels it
must exercise a measure of control. A full analysis of this surprising
anomaly is beyond the scope of this paper, but it needs to be borne in
mind whenever claims are made that cultural pluralism or diversity is
legalized and institutionalized in the United States but not in France.
In the realm of religion the reverse would seem to be the case.

Comparison of the two forms of republicanism is of course
complicated by the fact there have been five republics in France and,
in a formal sense at least, only one in the United States. France did
not become permanently committed to democratic forms of republicanism
until the establishment of the Third Republic in the late nineteenth
century. The American Revolution on the other hand created a durable
national consensus behind republican principles. The basic structure
established by the Constitution of 1787 remains in effect to this day,
although an argument could be made that the Civil War and the
Reconstruction Amendments to the Constitution ushered in a de facto
second republic. What needs emphasis here is that the French Revolution
was a much more internally divisive event than the American. It left
behind it two nations—revolutionary, republican France with its
commitment to the rights of man, and traditional, Catholic France with
its lingering dedication to the institutions and values of l’ancien
régime. The latter allegiance, although remaining a minority
persuasion, came to the surface spectacularly in the hysteria
surrounding the Dreyfus Affair at the turn of the century and in the
rhetoric and policies of the Vichy government during World War II.
Antisemitism and Nativism were among its hallmarks, and its legacy can
be found today in the anti-immigrant agitation of Jean Marie Le Pen and Le Front National.¹²

If the precarious and episodic character of French republicanism stemmed from the fact that the Revolution had failed to eradicate the conservatism of the old order, the American experiment faced its greatest threat when the division of sovereignty between the states and the federal government became of crucial importance in the contest for national power between slave and free states in the period between 1846 and 1861. The resulting civil war was far bloodier than the revolutionary upheavals that occurred in France in 1830, 1848, and 1871. The Union victory in the war ended claims of state sovereignty, but the retention of federalism and "states' rights" left the post-bellum United States far less centralized than the Third Republic. One consequence was that the citizenship rights for African Americans proclaimed in the Fourteenth and Fifteenth Amendments could not be effectively enforced in the southern states after white supremacists regained control there in the 1870s.

The issue upon which the Union broke apart—the future of black slavery—was also an issue in France, both during the Revolution and in the 1830s and 40s. The relation of slavery to the dominant political and social values was of concern from the start in both republics but clearly loomed larger and had greater impact in the United States. Slavery for the French before the Revolution had been mostly confined to distant Caribbean colonies. As Sue Peabody has shown, there were concerted efforts throughout the 18th century to prevent the growth of slavery and a black population in Metropolitan France.¹³ Under a law of 1777, for example, West Indian planters visiting the metropole could be attended by their slaves during the voyage but then had to deposit them in special detention centers in the port cities from which they could
be sent back on the next available ship. It is hard to determine how much of this exclusionary policy was based on a belief that slavery as an institution was contrary to French values and how much it reflected racial prejudice—a desire to ensure that France remained all white. But the result in any case was to prevent both slavery and a black presence from developing in metropolitan France. As Robin Blackburn has suggested for both France and England, the confinement of slavery and most blacks to distant colonies may have put limits on the growth of "popular racism." Certainly there was less fertile ground for its development than in the United States.

Before the American Revolution slavery had been established everywhere in the North American colonies; afterwards it was phased out in the northern states, although cities like New York and Philadelphia retained substantial black populations. The Constitution compromised the slavery issue by making provision for the future abolition of the international slave trade but also rendering it virtually impossible for the federal government to take action against slavery where it was authorized under state law. As previously suggested, such a compromise was necessary in order to gain the adherence of the planter-dominated deep southern states. The revolutionary French national assembly, where West Indian planters were virtually unrepresented, voted to abolish slavery in 1794, the first time any nation had taken such action.

Historians debate the extent to which this decision was motivated by principled adherence to the rights of man, as opposed to pragmatic calculations arising from the Haitian revolution and the competition with the British for control of the Caribbean. But clearly there was a more efficacious sense of the incompatibility of republican values and chattel slavery in the Paris of 1794 than in the Philadelphia of 1787. French revolutionary emancipation was short lived, however, except in
Haiti. In 1803, at a time when gradual emancipation was proceeding in the American north, Napoleon reinstated slavery in France’s remaining plantation colonies. By the 1830s and 40s antislavery movements had developed in both Metropolitan France and in the northern United States. The French movement was much more cautious and elitist than the American and scrupulously avoided mass meetings and popular agitation. It succeeded in 1848 only because of a special opportunity created by the revolution of that year.\textsuperscript{16} American abolitionism, like that of Britain, appealed to the moral and religious sentiments aroused by an evangelical revival that scarcely touched France, a country where Protestants were a small minority. But the American antislavery movement, unlike the British, aroused massive internal opposition. Until 1860, the slaveholding South was able to dominate the national political arena and thwart antislavery reform or even action against the expansion of slavery. Consequently it took a sectional civil war to bring about a reform that occurred much more easily in mid-nineteenth century France, where the institution under attack had come to be viewed as a marginal and mainly colonial interest.

Black slavery left significantly different legacies in the two countries because the cultural and social weight of slavery as an institution was so much greater in one case than in the other. Post-1848 France did not have a domestic color line for the simple reason that no significant black population had been allowed to develop there. That France had ever been seriously implicated in African slavery was virtually wiped from the national memory. A survey of the history texts used in French schools before the 1980s revealed that they condemned slavery in general but contained no acknowledgement whatever that French slave colonies had ever existed or that slavery had been abolished, reinstated, and then abolished again.\textsuperscript{17} In the United
States on the other hand, slavery left behind a domestic heritage of racial division and inequality that has remained a central feature of the national experience. African Americans have remembered slavery as the brutal oppression of their ancestors and a source of their enduring stigmatization. Many whites, consciously or subconsciously, have used the memory of blacks as slaves and whites as masters to buttress their sense of priority and supremacy over a race stereotyped as inherently servile. Emancipation did not destroy a status order based on pigmentation and ancestry. Indeed the color line was more clearly and fully articulated than ever before in the Jim Crow system that developed in the South in the late nineteenth and early twentieth centuries. Reformist efforts to make the relationship between blacks and whites more egalitarian or competitive--such as those made by Reconstruction era Radicals and the interracial Progressives who formed the NAACP in 1910--kept hopes for racial justice alive but also intensified the reactive racism of many whites. The French were not color blind, but their sense of identity was far less dependent on whiteness than was that of many Euro-Americans. "Otherness" for them would be constructed somewhat differently.

As we have seen both the United States and France were immigrant-receiving societies that required massive importation of foreign labor to industrialize themselves in the late nineteenth and early twentieth centuries. But they did not manage immigration in the same way. Immigration to the US was primarily an individual matter, especially after the prohibition of contract labor in 1882. The main restriction before the 1920s was the exclusion of Asians, beginning with the Chinese in 1882. Most French immigration was of groups of workers whose recruitment was controlled by the state working in cooperation with labor-hungry industries and negotiating the terms of employment with
Citizenship through naturalization was relatively easy for European immigrants to America, but this right was denied to Asians until the mid-twentieth century. France made naturalization much more difficult for everyone by establishing stringent cultural and linguistic requirements. In 1930 55% of the foreign born in the United States had become citizens, as compared to only 11% in France. Under the American system of *jus soli*, all children of immigrants born in the United States are automatically citizens. In France there has been an elaborate set of compromises between *jus soli* and *jus sangunis* (descent based citizenship). Under the system that prevailed from 1881 to the post-World War II period, birthright citizenship was granted only to the children of foreigners who were themselves born in France. Even today the children of non-naturalized immigrants do not officially become citizens until they have reached maturity and met a residence requirement. Bars to immigration and naturalization in the United States have tended to be based on ethnoracial categorizations, going back all the way to the first law governing the naturalization of immigrants, passed in 1790, which limited the right to “free white person(s).” The establishment of quotas for European nationalities in 1924 responded not only to cultural nativism but also to the belief that old stock “Nordic” or “Anglo-Saxon” Americans were innately or racially superior to the “new immigrants” from southern and eastern Europe. In France an immigrant’s right of entry has been based primarily on the needs of the French economy and his or her access to citizenship has been more dependent on perceptions of cultural difference or distance than on the kind of broad racial categories that were applied in the American case.

The relation of immigration to national identity has played itself out quite differently in the two contexts. Being inhabitants of
a new country populated mainly by settlers and immigrants (voluntary or involuntary,) Americans have tended to see immigration as central to the meaning of the national experience. As citizens of an old nation with a long past that predated substantial immigration, the French tend to see newcomers simply as candidates for assimilation into the existing cultural crucible rather than as bringing something new to the mix. Many current observers have seen a contrast between America’s acceptance of ethnic pluralism or “multiculturalism” and France’s adherence to the ideal of a single, homogeneous national culture. The absence of hyphenated identities and avoidance of the very term “ethnicity” in French discourse would seem to support this view. There may be Italian-Americans but not Italo-French, a Jewish vote in the United States but not in France. However valid this contrast may be from a contemporary perspective (and we will return to this later), it is misleading when applied to the reception of immigrants in the late nineteenth and early twentieth centuries. During that period pressures for the assimilation or “Americanization” of immigrants was just as insistent as current demands for the Frenchification of new arrivals. Ethnic diversity was not a prominent American value at a time when the issue seemed to be whether southern and eastern Europeans, who deviated from an essentially Anglo-American cultural prototype, could be Americanized. “The melting pot” as usually conceived had a fixed composition rather than one that could and should be changed by introducing new ingredients.

Although the subject has not been extensively investigated, it appears that the immigration to France from other parts of Europe that occurred between the 1880s and the 1930s did not inspire the kind of fervent and insistent assimilationism that has developed more recently. It was simply taken for granted that foreigners who desired citizenship
would become culturally French. And to a considerable extent they did. Two factors promoted rapid cultural assimilation, particularly of the second generation. One was a uniform, centralized, and compulsory educational system that effectively inculcated French language and culture. The other was the strength of class-consciousness. Most immigrants were workers. When they were simply foreigners brought in to work in mines and factories, they were sometimes objects of violent hostility from French workers who saw them as low-wage competitors. But, to the extent that they or their offspring gained citizenship rights, they tended to be integrated into the institutions and subculture of the French working class and often substituted a class-based identity and ideology (socialism or communism) for one based on national origins. Those of the second generation who had middle-class origins or did particularly well in school could benefit from the meritocratic quality of French higher education and public bureaucracies. In the late nineteenth and early twentieth centuries individual Jews may have had readier access to French elites than Jewish immigrants and their children had to the equivalent inner circles in the United States. But they also encountered more public antisemitism and found that the price of success was to de-emphasize or obscure their ethno-religious identity. A delegate to the national assembly during the Revolution expressed an enduring French republican attitude toward Jews (and toward ethnicity in general): “To the Jews as a nation, one must refuse everything; but to Jews as men one must grant everything..., there cannot be a nation within the nation.”

American schools, like those of France, played a major role in acculturating immigrants, as did the labor movement, which simultaneously opposed massive immigration because of its effect on wages but, with a similar protective instinct, invited many of the
newcomers into its own ranks. But the decentralized American educational system opened the way to local control, which in areas where one ethnic group predominated could include instruction in a foreign language, such as occurred in German medium schools in the Midwest until World War I brought an end to this form of multiculturalism. More powerful and lasting as sustainers of the ethnic identities of Americans of recent immigrant background were the non-political character of American labor movement and the pervasive national belief in upward social mobility. Politics, especially urban politics did not normally revolve around class interest and ideologies but was more often a struggles for ethnic dominance or influence in the allocation of public jobs and resources, as between the Irish and the old stock Americans in many cities in the late nineteenth century. Whereas French centralization and class-based politics left little scope for mobilizing around ethnic identities, American localism and interest-group politics provided fertile ground for this kind of pluralism.

Because of the color line in the United States, immigrants often benefited from claiming a “white” identity. Doing so put them on the right side of the great ethnoracial cleavage in American society, providing economic opportunities unavailable to blacks and simultaneously bolstering their self-esteem and sense of belonging. It also acted as a further inhibition to class-consciousness. The French, lacking a domestic color line, defined “otherness” primarily in terms of nationality. The major distinction was, and continues to be (at least officially), between foreigners or aliens and French citizens of whatever ancestry. The question of the moment is whether some foreigners are more likely to become French than others. Before World War II most immigrants to France came from other European nations, and
their descendents are now regarded as thoroughly French. But the immigration from outside of Europe and especially from north and west Africa has raised serious questions about the current and future viability of the assimilationist model. Many Algerians or their children have gained citizenship by virtue of having been born in Algeria at a time when it was still considered part of France. But in this case recognition of citizenship has not led to assimilation.

Understanding the situation of Algerians in contemporary France requires attention to our fourth and last comparative theme—the growth of the national domain and the establishment of new settlements and colonies. As we have seen, both the United States and France had a history of geographical expansionism even before they acquired overseas colonies. The creation of the French hexagon by conquests and annexations established an ideological precedent for the “civilizing mission” that served as a rationale for French colonialism. A long experience of turning peasants and culturally exogenous provincials into Frenchmen seemed to raise the possibility that the same could be done for colonized peoples in Africa and Asia. The universalism of the revolution and the republican tradition could provide a blueprint for liberating and civilizing the world. The sense of mission that accompanied American expansionism also invoked universalist principles. Westward expansionism under the banner of Manifest Destiny was meant to extend “the area of freedom,” and the acquisition of the Philippines in 1899 was proclaimed as an opportunity to bring civilization to “our little brown brothers.”

But proto-colonialist expansionism in the two cases differed in the degree to which indigenous populations were actually assimilated. Occitans, Savoyards, and Bretons became French to a fuller extent than American Indians, or even the visibly Latino inhabitants of the
formerly Mexican Southwest, have become Americans. The greater role of “race” in white American thinking is part of the explanation but not all of it. The cultural proximity of the peoples involved and the demographics of their relationship also have to be taken into account. Efforts to “civilize” and assimilate American Indians were notably ineffectual (when not hypocritical), partly because of the sheer volume of white settlement in what had been their homeland and partly because of cultural differences and antagonisms. Not only were whites contemptuous of what they took to be Indian “savagery,” but many Indians vigorously resisted the demands of missionaries and government agents that they abandon their traditional way of life. Those becoming French over the centuries already partook of the broader European Christian civilization and, for the most part, kept possession of the soil rather than being displaced by settlers from the older France.

These contrasts are obvious. More intriguing and less self-evident were the consequences for subsequent colonialism of the earlier histories of expansion into contiguous areas. As in the case of non-white immigration, America’s melting-pot assimilationism once again ran up against barriers of race or color. The elevation to full American citizenship of Filipinos and other non-white colonial subjects acquired at the end of the nineteenth century was never seriously contemplated. Since these peoples were not potentially full citizens, they had to be granted eventual independence or a peculiar “commonwealth” status. French colonialism on the other hand was compatible, at least in theory and rhetoric, with a colorblind assimilationism.

But theory and rhetoric are not reality, and it would be unrealistic to conclude that the “civilizing mission” of French imperialism was genuinely egalitarian in purpose and effect. The presumption that French republican civilization was the universal norm
to which all humanity should aspire can of course be seen as covertly ethnocentric. But, putting aside contemporary debates over the truth claims of Enlightenment universalism, the assimilationist ideal could not be lived up to or successfully implemented, because of two principal factors. One was racial prejudice. While generally less susceptible to color-coded racism than white Americans, the French were not immune to it. In 1778, intermarriage between blacks and whites was formally prohibited in metropolitan France. Although the ban was not enforced and disappeared with the Revolution, it was indicative of a residual tendency to stereotype blacks as inferior, buffoonish creatures beyond the pale of respectable society. Attitudes of this kind were most salient and openly avowed, it would seem, among conservatives or traditionalists who retained serious reservations about republican ideals and values. Those who carried out the work of colonization in Africa and Asia were often men of the right who had little sympathy with zealous efforts to implement liberty, equality, and fraternity. Imperialism itself tended to be promoted in France by those who believed that foreign and military adventures might cure the French from the dead weight of bourgeois egalitarianism and individualism.

Nevertheless the differences that impeded the assimilation of non-Europeans into a greater France were in the end more cultural and religious than racial. Even those genuinely committed to a universalist civilizing mission had to confront the immediate and practical challenges of ruling colonies with cultures vastly different from that of France. Given the limited manpower and resources available, colonial administration in many places would have been impossible without establishing a dual system of laws and rights. In its north and west African colonies the French generally made a distinction between the
many indigenes who wished to adhere to their traditional way of life and those few who were willing to give it up in order to become French. In practice this meant that most people were granted a dispensation to follow Islamic or other non-Christian laws and customs (polygamy for example) but that the rights associated with French citizenship were withheld from them so long as they continued to do so. The idea that colonized people could exercise citizenship within a greater France was always limited to those who would or could become culturally French, a qualification that paralleled the French concept of immigrant assimilation. To the extent that Algeria became a colony of settlement with its own representative institutions, Moslems were asked to give up their religiously based customs, if not their faith itself, in order to vote and have full civil rights. If a color bar operated to limit the American civilizing and assimilating mission, a culture bar directed particularly at Islam had a similar effect in some French colonies.

The late nineteenth and early twentieth centuries saw a dramatic surge of French colonial expansionism in North Africa and the encouragement of European settlement in Algeria with the aim of eventually incorporating that colony into metropolitan France. Driving these efforts was a desire to compensate for the loss of Alsace-Lorraine in the Franco-Prussian War. But to conceive of Algeria as a settler colony that was to become part of France when it was thoroughly Europeanized was to imply that the indigenous Moslem majority was to be denied representation except to the unlikely extent that it underwent a radical cultural transformation. Indicative of the two-edged or dualistic character of French response to ethnic différence was the open-door inclusiveness of eligibility for membership in French Algeria. Not only were the majority of settlers recruited from southern European countries other than France itself, but also the resident Jews
were granted naturalized French citizenship in 1870. (This decision from the metropole sparked hostile reactions from many of the European settlers and made Algeria a hotbed of antisemitism at the time of the Dreyfus affair.)

A somewhat different pattern prevailed in Senegal, where an original French enclave dating back to the slave trade of the seventeenth century had produced a class of African or mixed race assimilés who were considered French citizens between 1833 and 1851 and than again after 1871. As the colony expanded in the nineteenth century through the conquest of traditional societies, the ideal of assimilation continued to be proclaimed, and a few Africans took advantage of the opportunity to acculturate and gain French citizenship, but most did not and were ruled under a separate set of laws. During the early twentieth century, the ideology of the colonizers vacillated between assimilationism and “associationism,” a doctrine that acknowledged cultural pluralism and sanctioned indirect rule through the agency of cooperative chiefs or other traditional authorities. Appreciating the tangled and ambiguous heritage of French colonialism is essential to an understanding of current French attitudes toward race and ethnicity, even though, like the heritage of slavery, its influence is rarely acknowledged.

Currently the United States and France would appear to have sharply contrasting conceptions of how to manage ethnoracial diversity. Recognizing the role that race has played in producing group inequalities, the United States has adopted race-specific policies such as affirmative action and electoral reforms designed to promote greater representation for minorities. After a brief experiment with multiculturalism in the 1980s, it would appear that France has decisively rejected “the American model” and resolutely returned to an
assimilationist approach to the diversity created by the new wave of immigration. In recent years there has been much acerbic French commentary on American multiculturalism and similarly critical American complaints about the French refusal to acknowledge their own racism. Both sides in the debate have failed to give sufficient attention to differences in the two situations as they have developed historically. Group specific policies in the United States were originally justified as a response to the peculiar disadvantages and caste-like status of African Americans. They were later extended to other groups, especially Latinos, on the grounds that they had also suffered historical injustices. The emphasis on cultural diversity as valuable in itself is a fairly recent development. Elites in the United States are apparently more comfortable with affirmative action as an effort to achieve diversity, loosely defined, than as a direct, redistributive attack on the structural inequalities bequeathed by a long history of slavery, segregation, and discrimination. The fact that there is no domestic population group in France with a history of oppression and disadvantage equivalent to that of African Americans must be constantly borne in mind when comparing the two situations. Policies that are necessary and justifiable in one context may not be warranted in the other.

The contrasts are less sharp and the differences more subtle when it comes to comparing the responses to recent immigration from outside the developed West. In my view, the French have a more serious problem with nativism and xenophobia than does the United States, where anti-black racism continues to affect group relations in a decisive way. In France the greatest hostility is toward North Africans and especially Algerians. Blacks of slave ancestry from the French Antilles encounter much less prejudice and discrimination. The colonial experience and the
immense trauma of the Algerian War help to explain these attitudes. The traditional view that Moslems are difficult if not impossible to assimilate and the catastrophic failure to create an Algérie Francaise are major historical sources of current prejudices. The alleged incompatibility between a strong Islamic identity and the French concept of laïcité—as reflected most dramatically in the head scarf incident of 1989—stimulates current fears about the growth of a Moslem population in France and legitimates fervent appeals to the heritage of universalistic assimilationism. Before 9/11 at least, and arguably up to the present, the United States has had less of a problem with Islam *per se* because of its stronger tradition of religious pluralism and toleration. American concerns about the diversity created by recent immigration have tended to focus on Latinos and especially Mexicans. The sheer size of the influx and the retention of close ties between the immigrants and their friends and relatives across the border has engendered a concern for the survival of Anglo-American culture in some parts of the nation. But the reaction has been muted by a thirst for the low-wage, unskilled labor that these immigrants provide and also by the increasing acceptance of cultural pluralism as a general principle that has developed since the 1960s.

It seems to me that the United States and France can learn from each other. French universalism, or its equivalent, is a powerful weapon against racism, which is based on the belief in innate unalterable differences among human groups. Stressing what rights all people have because of what they have in common remains at the heart of anti-racism. A stronger awareness of such human commonality may be needed in the United States at a time when a stress on diversity and ethnic particularism may deprive us of any compelling vision of the larger national community and impede cooperation in the pursuit of a
free and just society. On the other hand the identification of such universalism with a particular national identity and with specific cultural traits that go beyond essential human rights can lead to an intolerance of the Other that approaches color-coded racism in its harmful effects.

NOTES

1 A comparison of the two revolutions is Patrice Higonnet, Sister Republics, the French and American Republicanism (Cambridge, Mass, 1988).


8 Quoted in Higonnet, Sister Republics, 166-167.

9 David Brion Davis makes this point in Revolutions: Reflection on American Equality and Foreign Liberations (Cambridge, Mass, 1990), p. 11.

10 My knowledge of church-State relations in France derives primarily from Jean-Louis Ormières, Politique et religion en France (Brussels, 2002).


14 Ibid., 116-118.


18 See Cross, *Immigrant Workers*.


25 Ibid., passim.

26 On how and why this occurred, see especially Feldblum, *Reconstituting Citizenship*. 