Addressing cultural differences resulting from immigration: a comparison between French and Swedish public policies

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Cultural diversity, Multilingualism and Ethnic minorities in Sweden

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Résumé de l'article
La convergence des politiques de l'immigration et de l'intégration en France et en Suède : La plupart des universitaires français tendent à opposer le modèle suédois au modèle français en matière d'immigration et d'intégration, chacun renvoyant à deux approches opposées de l'altérité. La Suède serait inspirée par la conception traditionnaliste-communautaire qui privilégierait le groupe par rapport à l'individu. Le modèle français procéderait d'une approche individualiste-universaliste qui porterait l'accent sur l'individu par delà son inscription dans une collectivité. Cette catégorisation est séduisante au premier abord car elle permet de caractériser les référentiels globaux qui ont présidé à la définition des politiques d'immigration de ces deux pays. Toutefois, elle ne permet pas de rendre compte des similitudes entre les politiques d'immigration et d'intégration dans les deux pays ni de la convergence croissante qui s'est opérée à partir des années 1980. Alors que la Suède a tempéré son multiculturalisme pour promouvoir une politique d'intégration, la France a tempéré son universalisme pour mieux prendre en compte la spécificité des populations immigrées dans le cadre de la lutte contre les discriminations. Bien que les deux pays conservent encore certaines de leurs spécificités, il est manifeste que leurs divergences se sont réduites. Cette étude vise ainsi à ouvrir la voie à de futures comparaisons plus fructueuses entre les politiques de l'altérité des deux pays.
Abstract: Most French scholars tend to oppose the Swedish model of immigration to the French one as they are thought to handle the otherness of the other in opposite ways. These two distinct models are thought to call forth the well established distinction between the traditional communitarian approach to otherness and the individual universal one. The French model is therefore seen as stressing the right of the individual irrespective of the right of the groups whereas the Swedish model is depicted as promoting the rights of communities before those of individuals. This distinction is appealing at first sight since it provides an insight into the global frame of reference for Swedish and French policies handling the otherness of the others. It fails however to highlight the similarities between immigration and integration policies of the two countries as well as the increasing convergence that has been taking place since the 1980s. While Sweden mitigated its multiculturalism to promote an integration policy, France departed from its universalistic stance in order to better address the issue of cultural diversity. Hence, differences between the two countries have been dramatically reduced despite some enduring peculiarities. This investigation hence aims at paving the way for future fruitful comparisons between policies related to otherness in the two countries.
Cultural diversity, Multilingualism and Ethnic minorities in Sweden * Kulturell mångfald, Flerspråkighet och Etniska minoriteter i Sverige * Diversité culturelle, Multilinguisme et Minorités ethniquest en Suède

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Addressing cultural differences resulting from immigration: a comparison between French and Swedish public policies

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La convergence des politiques de l’immigration et de l’intégration en France et en Suède : La plupart des universitaires français tendent à opposer le modèle suédois au modèle français en matière d’immigration et d’intégration, chacun renvoyant à deux approches opposées de l’altérité. La Suède serait inspirée par la conception traditionnaliste-communautaire qui privilégierait le groupe par rapport à l’individu. Le modèle français procéderait d’une approche individualiste-universaliste qui porterait l’accent sur l’individu par delà son inscription dans une collectivité. Cette catégorisation est séduisante au premier abord car elle permet de caractériser les référentiels globaux qui ont présidé à la définition des politiques d’immigration de ces deux pays. Toutefois, elle ne permet pas de rendre compte des similitudes entre les politiques d’immigration et d’intégration dans les deux pays ni de la convergence croissante qui s’est opérée à partir des années 1980. Alors que la Suède a tempéré son multiculturalisme pour promouvoir une politique d’intégration, la France a tempéré son universalisme pour mieux prendre en compte la spécificité des populations immigrées dans le cadre de la lutte contre les discriminations. Bien que les deux pays conservent encore certaines de leurs spécificités, il est manifeste que leurs divergences se sont réduites. Cette étude vise ainsi à ouvrir la voie à de futures comparaisons plus fructueuses entre les politiques de l’altérité des deux pays.

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Sweden is considered by French scholars as a representative of the European model of multiculturalism along with the Netherlands and Great-Britain. The Swedish “immigrant policy” was commonly depicted as the by-product of liberal pluralism supported by popular social movements (folkrörelser) at the heart of the Swedish political culture. It has therefore been argued that Swedish multiculturalism stood in opposition to the alleged French tradition of universalism in which the state is meant to “guarantee the unity of a common political space which ensures the integration of all individuals irrespective of their social, religious, regional or national background through abstraction and formal equality”.

Policies aiming at handling the otherness of the other are therefore thought to stem from opposite traditions in France and in Sweden. The French model is thought to emphasize the right of individuals at the expense of the communities whereas the Swedish model is depicted as

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granting rights to communities rather than to individuals. This distinction is appealing at first sight since it provides an insight into the global frame of reference for Swedish and French policies handling the otherness of the other. It nevertheless requires further qualification since it fails to explain similarities between immigration and integration policies in the two countries as well as the increasing convergence that has occurred since the 1980s.

The alleged multicultural stance in Sweden can be questioned as its immigration policy has been multi-faceted from its very onset⁴. The contradictions between the official rhetoric and social practices in Sweden had yet to be underlined since:

"Nordic countries are not witnessing the constitution of organized ethnic minorities as in Great-Britain. Beyond the affirmation of respect towards cultural identities, we observe a strong pressure to align on the values of the host society which calls forth the French integration policy"⁵.

Even though this statement reflects a French-centered understanding of cultural diversity, it highlights the peculiarity of Sweden’s approach towards multiculturalism. Conversely, French immigration policy has often departed from its alleged universalist stance as it sought to ease the return of foreign workers to their homeland⁶. The polarizing effect of comparisons drawn between France and Sweden on immigration matters may have obscured the issue. The European legislation as well as the disillusion with the results of immigration have caused policies to converge. This article aims therefore at questioning the underlying statement that France and Sweden have contradictory, if not conflicting, values on matters of immigration.

**Swedish “migrants’ policy” and the lure of multiculturalism**

Sweden used to be a country of emigration as roughly 1 300 000 Swedes left the country between 1860 and 1920⁷. It became a country of immigration at the end of World War II as it

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³ There are several policies related to otherness in Sweden: immigration policy (invandringspolitik) which sets the rules to gain access to the Swedish territory; asylum policy (flyktningspolitik) concerning political refugees and integration policy (integrationspolitik) related to foreigners and to Swedish nationals of foreign descent regularly residing in Sweden. Minority policy (minoritetspolitik) should also be taken into account since it applies to the four national minorities identified in Sweden. In comparison, France only has two policies related to otherness: immigration policy (politique de l’immigration) which includes asylum policy and integration policy (politique de l’intégration).

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resorted to foreign workforce originating from Finland, Yugoslavia, Turkey and Greece to support its economic growth. The first programs directed towards foreigners were launched in Sweden in the mid-1960s with support to immigrant organizations and financial assistance delivered to cultural activities promoting immigrants’ original culture. They were devised to engage foreign communities in Swedish social life in accordance with the global frame of reference of Swedish policies of this time. Some communities were already strongly organized such as the Finnish and Estonian communities. They could even enjoy the support of foreign actors such as the Finnish government which was seeking to preserve the linguistic and cultural heritage of its nationals. In 1968, the adoption of the first policy designed to address the needs of immigrants in Sweden (invandrarpolitiken) did not however retain multiculturalism as an objective. The government opted for a middle-of-the-road stance cautiously avoiding referring to “assimilation” or “integration” to characterize its “immigrants’ policy”. Beyond the official rhetoric, the practice relied on various programs inspired by diverging principles. Some programs were clearly driven by multiculturalism and relied upon structured immigrant groups whereas some were inspired by universalism and targeted individuals.

In 1975, proponents of multiculturalism sitting at the immigration investigation committee managed to influence the content of the Swedish “immigrant policy”. Special rights were granted to minorities residing in Sweden as the new constitution stated “the right of ethnic, linguistic and religious minorities to preserve and develop their own cultural and religious life”. These new principles were introduced in a bill on immigration policy passed the same year. As a result, Swedish immigrant policy came to rely upon three pillars: equality, freedom of choice and cooperation between Swedes and foreigners. The newly acknowledged freedom of choice embodied par excellence the multicultural society that was thought to arise as it stated that:

“Members of linguistic minorities residing in Sweden should be granted the opportunity to decide themselves to which extent they want to preserve and develop their original cultural and linguistic identity. This implies that the various immigrant groups should receive economic support in order to develop their cultural activity.”

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10 Regeringsformen, Chapter 1. Basic principles of the form of government, article 2.
The Parliament therefore decided to subsidize cultural activities related to immigrants’ original culture and to enrol teachers in order to deliver lectures in immigrants’ mother tongue.

The rights of migrants were even expanded in 1975 as local electoral rights were granted to foreigners able to prove a three-year residency. Multiculturalism was officially advocated as the main objective of the “immigration policy” from 1975 to 1985 even though Swedish experts were aware of contradictions between its underlying principles. It was obvious that equality and freedom of choice would prove contradictory in some cases. Multiculturalism could indeed induce a competition between various communities where each would seek public resources at the expense of others contradicting the principle of equality. Even though the constitution acknowledged the rights of foreigners as part of a community, it also granted rights to foreigners as individuals since it stated that a foreign national equates a Swedish citizen in most matters.\footnote{Regeringsformen, Chapter 2. \textit{Fundamental rights and freedoms}, article 22.}

Swedish “immigrants’ policy” at bay: the challenge of mass immigration

Labor market restrictions for foreigners were introduced in Sweden in 1968 at the same time as the first programs for migrants. From 1972 onwards, work permit applications were so scrutinized that access to the Swedish labor market was de facto reserved to nationals of Nordic council member states\footnote{Aleksandra Ålund & Carl-Ulrik Schierup, \textit{Paradoxes of multiculturalism}, Adelshot, Aresbury, 199, p. 22.}. These restrictions were however challenged by the generous asylum policy led by the Swedish government from the late 1970s to the early 1990s. The contradiction between these two policies was surmounted only with the introduction of an immigration policy (\textit{immigrationspolitik}) in December 1996. This policy hence aimed at improving the consistency of rules applied to foreigners in Sweden with regards to their entrance, their stay and their possible return to their homeland.

In application of asylum policy (\textit{flyktningspolitik}) 30,000 to 50,000 asylum seekers came each year to Sweden whereas 10,000 to 30,000 came back to their homeland. Sweden was left each year with a net balance of 20,000 immigrants coming from various parts of the world. Iranians, Iraqis, Chileans, Argentineans, Peruvians, Kurds from Turkey and Eritreans from Somalia, to name but a few, formed new immigrant groups less structured than the previous ones. As a result, the pattern of immigrants was completely transformed as shown in charts 1 and 2.

In 1975, immigrants came mostly from European countries with a vast majority coming from Finland. Turkey was then the only non-western country whose nationals immigrated to Sweden yet it had than 10,000 nationals residing there. More than 30 years later, Swedish society shows more diversity due to immigration from the Middle-East, Latin America, Africa and South-East Asia as the number of foreign-born denizens increased by 400,000 from 1970 to 1995.

\footnote{Regeringsformen, Chapter 2. \textit{Fundamental rights and freedoms}, article 22.}
\footnote{Aleksandra Ålund & Carl-Ulrik Schierup, \textit{Paradoxes of multiculturalism}, Adelshot, Aresbury, 199, p. 22.}
As soon as 1985, the Committee on immigrant policy stated that immigration would never turn Sweden into a multicultural country as multiculturalism would only result in the addition of groups with different cultures and languages. The celebration of cultural diversity in the 1970s was indeed partly based on the firm conviction that immigrants would return to their homeland. The “immigrant policy” was therefore thought to ease the return of immigrants by maintaining as

strong links as possible with their original culture. As the number of returns turned out to be fewer than expected, one notices a drift in the Swedish stance towards a conception of cultural diversity more in line with the French integration policy. "Freedom of choice" was for instance reformulated in the late 1980s into "respect for the identity and integrity of the individual as well as opportunities to develop one's own cultural heritage within the framework of those basic norms which in Swedish society apply to human coexistence".\(^{15}\)

The late 1990s witnessed two main evolutions in the Swedish approach towards cultural diversity. First of all, the traditional "immigrant policy" was replaced by an "integration policy" in 1998. The latter aimed at "dealing with opportunities to get into a wider unity without hurting one’s cultural and ethnic identity. Certain adaptation should however always take place when meeting other people".\(^{16}\) The debate on cultural diversity also evolved since Sweden ratified in 1999 the Framework convention for the protection of national minorities. The Swedish Parliament recognized five national minorities: Jews, Roma, Sami, Swedish Finns and Tornedalians. These minorities were hence granted special rights that immigrant groups were not eligible to. This decision has therefore drawn a line between groups whose diversity has to be protected and those whose diversity has to be accommodated. The difference is even more striking since Swedish Finns were the main proponents of the "freedom of choice" that characterized the "immigrant policy" from 1975 to 1985. Yet, Sweden had not totally departed from its multiculturalism as there were still 83,042 pupils who followed lectures in their parents’ mother tongue during the 2006-2007 academic year.\(^{17}\) The figure is even more striking when compared to the 73,436 French pupils of foreign descent who followed these lectures during the 2004-2005 academic year.\(^{18}\) Furthermore, the Swedish government elevated 2006 as the year of cultural diversity in an attempt to value immigrants’ cultural heritage though it did not prove to be a conclusive experiment.\(^{19}\) Some authors have even suggested that the celebration of cultural diversity had reinforced the perception of an insurmountable otherness between Swedes and non Swedes. In this view, Swedishness has not yet incorporated the new components resulting from immigration.\(^{20}\) Such an analysis seems to be confirmed by the fact that Sweden is displaying the


\(^{17}\) SOU 2008:26, \textit{Värna språken – Förslag till språklag}, p. 162.


\(^{19}\) SOU 2007:50, \textit{Mångfald är framtiden}, pp. 60-72.

highest density of foreigners in the most disadvantaged suburban zones among western countries\textsuperscript{21}. This phenomenon is even consolidating as the share of foreigners or Swedes of foreign descent is growing bigger within given suburban zones (\textit{invandrartätområde}). For instance, the share of migrants has risen from 85.4\% in 2007 to 89.3\% in the city of Rinkeby\textsuperscript{22}.

\textit{From immigration to integration policy in France}

The colonial legacy has left its imprint into the French immigration policy as migration flows have been influenced by legal and informal ties binding the former metropole and its ex-colonies. Most notably, the Evian agreements, which opened the way to Algerian independence, contained a clause allowing freedom of movement between the two countries. This clause was not removed until 1968 as part of a new protocol on “free movement, employment and residence of Algerian nationals in France”. As demonstrations of “French Muslims from Algeria” in favor of Algerian independence grew in number from 1950 onwards French civil servants came to perceive North African as “a problem, a risk or a threat”\textsuperscript{23}. Jérome Valluy underlines that “this ideological transformation of policemen as well as prefectural and ministerial bureaucracies was reinforced in the 1960s as decolonization led colonial civil servants to hold new positions in the metropole”\textsuperscript{24} Hence “combined security and social policies targeting French Muslims from Algeria – who later became Algerians - […] laid the ground for supervision policies of immigrant population”\textsuperscript{25}

It wasn’t until 1968 that immigrants emerged as a social issue in French politics\textsuperscript{26}. Immigration policy was first aimed at strengthening immigrants’ original culture since it was thought to divert workers from union or political engagement. On July 3\textsuperscript{rd} 1974, the French government decided to suspend immigration for workers and their family. Immigrants already living in France were offered a choice between total assimilation and continued cultural entrenchment under the new immigration policy led from 1974 to 1977. This new set of rules and norms applied to foreign residents was aiming at strengthening the original culture of migrants in order to ease their return to their home country.

“When autonomy of migrants and increased dependency on home countries were in balance; social policies tended to promote dependency. Besides granting satisfaction to home countries and leaving the door open for a potential return,
this option was meant to cement social peace as it diverted migrants from political or union claims ‘à la française’.

In this respect some French institutional settings were offering common features with contemporary Swedish policies.

The state even departed from its tradition of secularism, established in 1905, by subsiding the development of Islam in workers’ dormitories. The French educational system has even hosted foreign teachers in order to provide lectures to immigrants’ sons in the original language of their parents as part of bilateral conventions concluded with Portugal, Algeria, Spain, Italy, Morocco, Tunisia, Turkey or Yugoslavia. These ELCO (enseignement en langue et culture d’origine) programmes were at first reflecting the underlying conviction that immigrant workers should leave sooner or later with their family. However, these programmes have been challenged by the settlement of immigrants and are witnessing a continuing decrease of its participants.

A political consensus on the need to address the situation of immigrants had to be achieved prior to the adoption of an integration policy. Such a consensus was reached in July 1984, as a new bill drew a line among immigrants between insiders and outsiders. Immigrants regularly admitted in France were granted equal rights with French nationals except the right to vote. Irregular immigrants were deprived of any legal status and protection. Integration policy was hence formulated as the immigration policy became obsolete due to the “zero immigration” objective.

Chart 3: Origins of the largest immigrant groups residing in France in 1975

Source: Institut national de la statistique et des études économiques

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Chart 4: Origins of the largest immigrant groups in France in 2005

Cultural diversity as a social issue: the need for anti-discrimination measures

Both France and Sweden were initially reluctant to introduce anti-discrimination measures. The political elite of the two countries was convinced to meet the highest standards for promoting integration. Hence the Swedish government expressed in 1973 its confidence in the lack of racial or nationalist prejudices among Swedish population and decided to discard anti-discrimination measures\(^{29}\). The commission on discrimination set up in Sweden in 1978 suggested however that a bill should be drafted to combat ethnic discrimination at work. Given the traditional reluctance of the legislator to intervene into the matters for which social partners hold the main responsibility, the proposal was unlikely to succeed. Rather than legal dispositions, a new ombudsman was created in 1986 to deal with discrimination at work. However the ombudsman against ethnic discrimination did not enjoy a power similar to that of the ombudsman for gender equality. The legislator accepted therefore to take actions to prevent ethnic discrimination at work in 1992. Yet, the new law was criticized for failing to offer appropriate protection against discrimination since the burden of proof relied upon the contestant. Ethnic discrimination and racism stirred public attention with extreme right wing movements' growing momentum. These movements also known as “white power” (vitmakt) were highlighted as two immigrants from Somalia were beaten up and a mosque burned down in the town of Trollhättan in 1993. Swedish society was even confronted

to the effect of the hatred of the other with the slaying of an Ivory Coastian in Klippan in 1995. As a result indirect ethnic discrimination was acknowledged with a new bill passed in 1999. European legislation spurred the progress of anti-discrimination measures in Sweden in the 2000s.

Anti-discrimination proved to be an equally sensitive issue in France. The country which prides itself in human rights leadership could not easily accept that its treatment of immigrants was not ideal. Furthermore, public authorities could not resort to some form of affirmative action in order to address the issues of integration since they refused to set up policies on the basis of origins. Territoriality was the only acceptable basis to build a policy on in accordance with the French Universalist political culture\textsuperscript{30}. For instance, special help in education was provided to immigrant communities through territoriality. Extra funding for education was therefore delivered to schools located in areas where immigrants accounted for about 30 percent of the local population (zones d'éducation prioritaires).

The first advisory body on integration, named Haut conseil à l'intégration, was founded in 1989 in order to give recommendations for the integration policy. However the turning point for French policies related to the otherness of the other occurred in 1998 as the Haut conseil à l'intégration suggested that the struggle against discrimination should become the cornerstone of French integration policy. The consultative body claimed in 1995 that “liberty implies that each person is free to choose his/her behavior as long as (s)he follows the rules of social life and respects the laws of the Republic”\textsuperscript{31}. It also pointed out that discrimination was based on ethnic basis, paving the way for a better acknowledgment of immigrants’ origins by French society. French integration policy therefore departed strongly from its initial Universalist stance. A ban on indirect discrimination at work was introduced in French law in 2001 in the wake of the EC anti-discrimination law. In 2005, a new authority called Haute autorité de lutte contre les discriminations et pour l’égalité was created to combat ethnic discrimination following the example of the ombudsman again ethnic discrimination.

**Uncertainties surrounding migrants integration in France and Sweden**

From the 1950s to the 1970s, migrants were mostly integrated through their work in France and were often deprived of the opportunity to socialize as they were relegated into workers dormitories. These dormitories were created for Algerian migrants in 1956 in order to prevent the National Liberation Front from getting a grip on this community. The creation of workers dormitories was consistent with a conception of public intervention “combining the allocation of


\textsuperscript{31} Haut conseil à l’intégration, Liens culturels et intégration, La documentation française, Paris, 1995, pp. 21-22.
social resources and the maintenance of public order notably through identification, localization and control of communities perceived as a problem”. Housing in workers dormitories was later extended to all African communities making it more difficult for them to integrate as they were concentrated in zones of urban relegation. The economic crisis that hit France in the 1970s had a deep impact on migrants as they fell prey to mass unemployment. From 1979 onwards, migrants contributed up to 42% of job losses in the industry. Most of them postponed their return as they were eligible to unemployment benefits and as the prospects for employment in their homeland became uncertain. From 1974 onwards, they have also benefited from family reunion which offered a strong incentive to settle down. Immigrants were relegated into the outskirts of French main cities as a result of dysfunctions of the French public housing system. They became exposed to social isolation, unemployment and underperforming at school.

The situation in Sweden was differing from the French case in various respects. Migrants originating from a country outside the Nordic Council were experiencing greater linguistic difficulties as they were not conversant with the Swedish language. The early setting up of programs designed to teach Swedish to foreigners (svenska för invandrare) provided only a partial answer to the isolation issue of migrants. Furthermore, only one third of foreigners established in Swedish had migrated for economic reasons and was inserted into Swedish society through work. A vast part of foreign communities was even more marginalized since they were relegated in suburban zones as already mentioned.

Social relegation of migrants witnessed in these two countries has led society to question the process of integration. Some political entrepreneurs have built their political career on the stigmatization of migrants. The Front National in France has managed to take roots in the French political scene advocating the return of migrants and their descents to their “homeland”. Ny demokrati however failed in Sweden to gain votes on the migrants issue after its breakthrough during the 1991 parliamentary elections. It hence plunged from 6.7% of votes in 1991 to 1.2% in 1994. Sverigedemokraterna have successfully reintroduced this topic into Swedish politics as they are likely to enter the Riksdag after the 2010 parliamentary elections. This new actor into the forum of Swedish policies on the otherness of the other could pave the way for future evolutions of rules and norms applied to migrants.

Conclusion

Principled pragmatism has driven the evolution of attitudes towards cultural diversity in both France and Sweden. Differences between the institutional settings of the two countries and the matter of otherness proved not to be as marked as their official rhetoric. Swedish officials have hence abandoned the idea of putting foreign communities at the heart of the decision making process on the matter of integration. Migrants’ associations felt disconcerted towards this new integration policy that appears a bit fuzzy\(^\text{35}\). On the opposite, French political leaders have tried to leave more space to the expression of the otherness in a society that contended with regional identities. As a result, French and Swedish institutional settings have initiated a convergence, increased by common EC legislation. Each country has yet retained some of its distinctive features inherited from previous institutional settings as well as social representations. This could explain how Sweden manages to outperform France at the MIPEX index.

However the two societies are experiencing a common impatience towards the integration process. The public debate over the ban of burqa and niqab in France in 2009 reflected this impatience. It appeared in Sweden with the conviction that a part of migrant communities cannot manage to integrate\(^\text{36}\). It is however difficult for scholars to draw conclusions on this matter since integration is “a process that can only be assessed with hindsight in order to tell whether it succeeded or failed”\(^\text{37}\). Integration is therefore a process that involves society as a whole over a long period of time.

Chart 5: Integration in France and Sweden compared


\(^{37}\) A. Sayad, « Qu’est-ce que l’intégration » in A. Sayad (dir. by), *La double absence*, p. 307.
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