

From Varieties of Capitalism to Varieties of Activism: The Antisweatshop Movement in Comparative Perspective

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Recent decades have witnessed an upsurge in activism around labor issues in global production networks. A particularly prominent example is the antisweatshop movement, a diverse collection of efforts to promote labor rights and improve working conditions in international supply chains for apparel and footwear products. Much of the literature on the antisweatshop movement emphasizes its global nature and the reliance of activists on transnational advocacy networks involving coalitions of Northern (usually U.S.-based) consumers and Southern workers. Drawing theoretical inspiration from the varieties of capitalism literature, we examine instead the emergence and institutionalization of antisweatshop politics within the global North. Based on interviews with groups in eight countries, we analyze the trajectories of antisweatshop activism in Western Europe, the United States, and Canada, finding marked variation in the leadership and composition of the movement across regions. Antisweatshop politics were particularly contentious in the United States, where labor leaders were active in framing the sweatshop scourge as a domestic as well as an international social problem. In Europe and Canada, the key role was played not by organized labor, but by other civil society groups that encouraged a multistakeholder approach to what was perceived primarily as an issue of social and economic development in the global South. Overall, our analysis highlights how national institutions and political cultures shape the way that actors assess a social problem and evaluate the possibilities available to effect meaningful change. Keywords: antisweatshop movement; global apparel industry; transnational advocacy networks; varieties of capitalism; labor rights.

Trade liberalization and the concomitant globalization of apparel production have been linked to deteriorating working conditions, stagnant wages, and the suppression of organizing efforts in numerous countries (Bonacich and Appelbaum 2000; Esbenshade 2004). Over the last two decades, a diverse collection of efforts to address these issues and improve conditions for garment workers has emerged, largely in response to a spate of sweatshop exposés. Because consumer campaigns and other mobilizations around labor rights in global industries are often framed in terms of solidarity between Southern workers and Northern consumers, most research on the antisweatshop movement has emphasized its transnational character and the extent to which it reveals a growing awareness of the ways in which people, places, and processes are connected to each other through global production systems. Relatively little is known, however, either about the specific conditions that gave rise to antisweatshop politics in particular countries, or about the degree to which these local conditions shaped the development of transnational networks among labor rights activists. How did sweatshop labor become identified as a social problem in different

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countries? Which actors were responsible for highlighting the plight of workers in global supply chains? Did they propose similar solutions to the sweatshop problem?

This article answers such questions by analyzing the emergence and institutionalization of antisweatshop activism across three different regions of the global North. Based on interviews conducted with antisweatshop groups in Western Europe, the United States, and Canada, our comparative study highlights a dimension that is ignored by an exclusive focus on the transnational character of labor rights activism, which is the way in which national institutions, particularly industrial relations systems and political cultures, differentially shape actors' assessments of the opportunities and mechanisms available to effect meaningful change.

We identify two key differences in the way that antisweatshop activism developed in Europe and North America, and within North America, in Canada and the United States. These include the role played by organized labor in the emergence and framing of the movement, and the composition of the multistakeholder initiatives (MSIs) that were formed to encourage collaboration between companies, unions, and other civil society groups. We argue that the institutional contexts of domestic political economies, and the kinds of relationships they facilitate among social groups, shaped the forms of antisweatshop politics that emerged in North America and Europe.

We develop this argument in six sections: First, we build linkages between three hitherto unconnected literatures that represent complementary perspectives for understanding the emergence and development of antisweatshop movements in comparative perspective. In this section, we also explain our research design and methods. In sections two through four, we use primary data to analyze the evolution of labor rights activism in Europe, the United States, and Canada. The fifth section elaborates the key findings to emerge from our comparative study, while section six concludes by observing that, despite some indications of convergence in the antisweatshop field, the diverse origins and trajectories of activism that we describe continue to shape the evolving debate about working conditions in global supply chains.

Contentious Politics in the Global Economy

Three broad areas of research inform our comparative study of antisweatshop politics: transnational social movements, global commodity chains, and varieties of capitalism. While studies of transnational labor rights activism reveal the degree to which civil society actors are organizing across geographic borders to improve conditions in global supply chains, scholars of global commodity chains fill a gap in this literature by analyzing the organizational dynamics of the supply chains themselves. In so doing, they illuminate the underlying causes generating both sweatshop conditions in garment factories worldwide and the strategies chosen by activists to target global buyers in antisweatshop campaigns. However neither of these research streams, focusing as they do on the organization of the global apparel industry on the one hand, and the organization of transnational activist efforts to challenge industry practices on the other, has been sufficiently attentive to cross-country variation in *how* different groups mobilized around the sweatshop issue; we propose that this lacuna can be addressed via insights from the varieties of capitalism framework.

The Rise of Transnational Activism and Advocacy Networks

Social movement scholars have developed a robust literature on contentious politics in the era of globalization (Della Porta and Tarrow 2005; Smith, Chatfield and Pagnucco 1997; Tarrow 2001). Within this field, Margaret Keck and Kathryn Sikkink's (1998) work on transnational advocacy networks (TANs) has proven particularly influential. TANs refer to coordinated relationships in which nonstate actors "working together on an international issue" are "bound together by shared values, common discourse, and dense exchanges of information and services" (p. 2). Such networks have been used by environmental, human, women's, and workers' rights activists to coordinate their efforts across borders (Collins 2006; Moghadam 2005; Moog Rodrigues 2003; Sperling,

Feree, and Risman 2001; Stillerman 2003). Through TANs, activists have forged a “transnational public sphere” in which social movement organizations of diverse origins “interact, contest each other and their objects, and learn from each other” (Guidry, Kennedy, and Zald 2000:3).

Numerous researchers have applied the TAN construct specifically to labor activism, examining how linkages between Northern and Southern groups organizing around workers’ rights are developed (Anner and Evans 2004; Bandy 2004; Wimberly 2009), and why some transnational campaigns fail while others succeed (Armbruster-Sandoval 2005; Bandy and Bickham-Mendez 2003). Collectively, this work suggests that activists use TANs not just to pressure governments, but also increasingly to contest business practices in global industries. Scholars of TANs have thus “challenged the narrow conception that politics are limited to the state” by demonstrating how “contentiousness often spills into other institutional domains, such as the market” (King and Pearce 2010:250). Tim Bartley (2003, 2005), for example, attributes the emergence of certification programs that regulate the production of apparel and forestry products to two factors: (1) campaigns by unions and NGOs targeting companies for poor labor and environmental practices; and (2) the prevailing neoliberal climate, which channeled activist challenges to conventional industry practices into private forms of governance instead of possible alternatives, such as public regulation by governments or international institutions.

Critics of these private governance initiatives abound, however. Some scholars argue that they displace potentially more efficacious strategies, such as strengthening the state’s capacity to develop and enforce laws protecting workers (Esbenshade 2004; Seidman 2007). Others claim that private regulatory solutions, such as auditing programs designed to verify compliance with corporate codes of conduct, depoliticize labor struggles, co-opt critics, and fail to address the underlying causes of sweatshop conditions (Rodriguez-Garavito 2005; Sum and Ngai 2005). Although we do not disagree that private auditing and certification schemes have, for the most part, failed to secure the objectives sought by activists, we agree with Bartley that it is nevertheless important to understand how and why these strategies became the dominant response to the concerns highlighted by labor and environmental activists. Our study contributes to this understanding by examining the varying economic, political, and institutional environments in which antisweatshop activism emerged within three regions of the global North.

Situating TANs in Global Commodity Chains

If social movement scholars examine how civil society groups mobilize to challenge the policies and practices of multinational corporations, studies of commodity chains focus on the changing nature of corporate power in the global economy, and thus shed light on the conditions precipitating antisweatshop activism. Gary Gereffi (1994) coined the term buyer-driven commodity chain to describe the governance structure of labor-intensive industries in which far-flung subcontracting networks are a common organizational form. Buyer-driven chains are managed with varying degrees of closeness by lead firms, which market but do not make merchandise. Most prominent among these are retailers, including mass discounters such as Wal-Mart, and brands, such as Levi’s and Adidas.

Originally, much of the commodity chain literature focused on the implications of buyer-driven chains for the developing-country manufacturers that become incorporated into them as suppliers to lead firms. However, scholars soon noted that the buyer-driven concept also illuminates the experience of workers in these chains because, as apparel manufacturing becomes increasingly organized through global subcontracting networks, the cost pressures on contractors competing for the orders of lead firms increase. This pressure, in turn, is often passed on to workers in the form of stagnant wages and poor working conditions (Bonacich and Appelbaum 2000). In other words, buyer-driven chains can promote a race to the bottom among suppliers, thereby creating conditions ripe for precisely the kind of sweatshop scandals that we describe below.

Activists concerned about this race to the bottom and its implications for workers realized that they could leverage the buyer-driven dynamic of these chains to their advantage. Specifically,

they argued that the lead firms calling the shots regarding what is made, where, and at what price could also be held responsible for labor conditions throughout their subcontracting networks. Indeed, by linking the business practices, and especially the sourcing decisions of brands and retailers, to working conditions in developing-country factories, antisweatshop activists and organizers were creating a new discourse of corporate accountability—one that rested fundamentally on the role played by Northern-based companies in buyer-driven commodity chains (Featherstone 2002; Quan 2008). Thus, while efforts to institutionalize this accountability have not yielded the hoped-for results, as critics of extant private monitoring schemes have pointed out (Esbenshade 2004; Locke, Amengual, and Mangla 2009; Seidman 2007), any satisfactory account of why and how stateless regulation emerged, and any effort to develop alternatives to it, must acknowledge the challenges that globalized production systems managed by distant lead firms pose to the promotion and protection of labor rights.

Thus far we have discussed two literatures, transnational advocacy networks and global commodity chains, that privilege the *global* level for understanding the phenomenon in question—i.e., the organization and coordination of political activism and commodity production, respectively. However, relatively few contributions to these literatures are explicitly *comparative* (cf. Nepstad 2008). As a result, we know less than we should about the extent to which the buyer-driven dynamic of the apparel industry generates similar outcomes and similar activist “push back” in the different locations where these commodity chains touch down.

Varieties of Capitalism

A central argument advanced by the varieties of capitalism school is that globalization is compatible with persistent diversity among political economies precisely because different institutions encourage particular capabilities to develop among home-country firms (Casper and Whitley 2004; Hall and Soskice 2001). While most work within this tradition examines how different institutional configurations shape organizational behavior at the firm and inter-firm level, and/or produce patterns of industry specialization (Streeck 2009; Whitley 2007), we extend its core insight—that patterns of coordination and conflict among social actors vary across political economies—to the analysis of stakeholder relations within the antisweatshop field.

In so doing, we draw inspiration from a small but growing body of literature that examines how institutional contexts shape interactions between private sector actors and other segments of civil society (Hughes, Buttle and Wrigley 2007; Kang and Moon 2012; Schurman and Munro 2009). For example, Susan Christopherson and Nathan Lillie (2005) show that after being targeted in activist campaigns, both Wal-Mart and IKEA adopted policies to improve labor standards in their supply chains, but the degree to which these policies actually changed working conditions varied across companies, reflecting differences in how each retailer manages its subcontracting relationships and interactions with suppliers. This variation in organizational behavior, in turn, is linked to characteristics of each company’s home-country context, including the regulatory environment and the industrial relations climate (see also Durand and Wrigley 2009).

Our study builds on this emergent stream of literature, which brings a comparative institutional perspective to the question of how private sector actors and civil society groups engage. However, our focus is less on how companies have responded to labor rights activists than it is on how activists came to target brands and retailers in the first place, and how these various corporate campaigns coalesced into an antisweatshop movement featuring various degrees of collaboration among stakeholders. Further, the comparative design of our study enables us to chart how this movement emerged in three different regions, and thus to consider whether and how the diverse institutional contexts from which labor rights activism emerged proved significant in shaping the antisweatshop field.

Our comparative research design enables us to make three contributions to the extant literature. First, because most research on antisweatshop politics focuses on U.S. activists, or on networks between U.S. activists and their partners in the global South (Anner and Evans

2004; Armbruster-Sandoval 2005), we have only limited knowledge of when and why labor rights activism emerged elsewhere. Our study of the European and Canadian cases are a first step in filling this empirical gap, as they build on interviews and written material produced by the activist organizations themselves (e.g., Ascoly and Finney 2006; Merck 2007; Sluiter 2009).

Second, the primary data that we collected enable a new appraisal of the comparatively well-known U.S. case insofar as our interviews underscore the pivotal, but previously neglected role that organized labor played in this country's antisweatshop movement (cf. Johns and Vural 2000). Third, our interviews provided an opportunity for activists to recount not simply how particular campaigns coalesced into a movement and eventually into the field of antisweatshop politics, but also to reflect on how these developments were shaped by their views regarding what issues were at stake in these struggles, and what kinds of collaboration with other actors in the antisweatshop field made sense. Thus, by documenting the underappreciated variety that exists within what is often described as a global social movement, our comparative study of antisweatshop politics allows us to recognize diverse trajectories of labor rights activism within the global North, and to identify a connection between these trajectories and the specific political and institutional contexts shaping our informants' understanding of the causes, consequences, and possible solutions to the sweatshop scourge.

Research Design and Methods

Our interest in comparing trajectories of antisweatshop activism grew out of prior research the authors conducted over the last fifteen years on the global textile and apparel industries. This work focused primarily on the geography of production and the implications of global sourcing networks for firms and workers in both developing and developed countries (see, for example, Bair 2008; Bair and Gereffi 2001; Palpacuer, Gibbon, and Thomsen 2005). In the course of this research, we attended and participated in numerous workshops, conferences, and other meetings organized by a variety of apparel industry stakeholders, including brands and retailers, garment manufacturers, industry associations, unions, and NGOs. These events alerted us to a substantial diversity of views and approaches to the sweatshop problem, both among the activists and organizations comprising the antisweatshop field and among private sector actors. We drew on the tacit knowledge gained through this earlier research to formulate the specific questions motivating the present study: How did antisweatshop activism emerge and evolve within the global North? Do we observe systematic differences across regions in activist strategies and their interactions with other stakeholders in the field, such as labor unions and companies? If so, what explains this variation?

The primary data for our analysis was generated through 38 semistructured interviews with current or former representatives of 17 groups involved in antisweatshop politics in Europe and North America. The organizations and individuals in our sample were chosen because of their active role in either the emergence or institutionalization of antisweatshop activism in their countries. Some of these groups coordinated the first campaigns targeting companies accused of poor labor practices, thus initiating the wave of sweatshop activism that emerged in the 1990s, while others are multistakeholder initiatives that grew out of these efforts. The authors conducted interviews with representatives of these organizations over a seven-year period (2006 through 2012) in a total of eight countries (the United States, Canada, United Kingdom, the Netherlands, Belgium, France, Germany, and Switzerland). Most interviews lasted between one and two hours and were carried out in person at the offices of the organization, although some were conducted by phone. The majority of individuals we interviewed were staff members of the organization in question; their positions included founder and/or executive director of the organization, field representative and compliance auditor for a multistakeholder initiative, union organizer and strategist, and coordinator of transnational campaigns for a labor rights NGO.

Each of our interviews was transcribed, analyzed, and given an identifying code consisting of a letter and number; the letter refers to either E for Europe, US for the United States, or C for

Canada, and the number denotes the rank order of the interview among all those conducted within the relevant group. For example, E5 refers to the fifth interview carried out with one of the European-based groups in our study. We use these codes to reference specific interviews throughout our analysis, and when doing so, we also provide the year in which the interview was conducted (see Table 1 for additional information). Although the interviews provide the primary data source for our analysis, we also draw on varied reports, publications, and internal documents, which were produced by the organizations in our sample and which contain quotes from activists that we occasionally use to complement our own interview data.

In the following three sections of the article, each case is presented and analyzed along three dimensions: We first characterize the genesis of antisweatshop activism in each region. Next we explain how this activism became institutionalized in the form of multistakeholder initiatives (MSIs) involving various combinations of private and public sector actors. Finally, we explore relationships between different stakeholders in the antisweatshop field within and across the regions.

Before proceeding, two clarifications are in order. First, the objective of our study is to analyze the origin and trajectory of antisweatshop activism in North America and Europe. Accordingly, our sampling strategy was based on identifying the set of civil society groups that coordinated exposés and/or corporate campaigns designed to bring the sweatshop issue to public attention, and/or the organizations that emerged out of this activism. We therefore exclude private sector initiatives that were established, usually under the rubric of corporate social responsibility, by industry actors without the substantial participation of unions or NGOs. These include, most notably, the Worldwide Responsible Apparel Production (WRAP) project, a labor and environmental standards certification program established in 2000 at the initiative of the American Apparel Manufacturers Association, and the Business Social Compliance Initiative (BSCI), which was created in 2003 by the Foreign Trade Association (an industry association comprised primarily of large European retailers) to harmonize standards and promote social compliance in global supply chains.

Second, consistent with the expectations of the varieties of capitalism perspective, we acknowledge that differences in the evolution and development of antisweatshop politics exist within Europe. Notwithstanding such variety, our research revealed the existence of a *European* antisweatshop movement that is more than the sum of national movements. This largely reflects the role of a particular organization in the European field, the Clean Clothes Campaign (CCC), which contributed to the formation of different antisweatshop coalitions at the national level, and continues to coordinate the interaction of these coalitions with each other and with stakeholders outside Europe, including apparel companies and activist organizations in North America and in the global South. Thus, while the European case is not strictly comparable to the United States and Canada as single country cases, the coordination that the CCC achieves across countries within Europe justifies our decision to treat it as a case for purposes of this analysis.

The Antisweatshop Movement #1: The European Case

As is also true in the United States and Canada, the European antisweatshop movement is comprised of numerous organizations. What makes the European case distinctive, however, is the level of coherence that the movement achieves across countries. This coherence reflects the prominence of the CCC as the leading antisweatshop organization in the European field. Founded in 1989, the CCC is a network of national coalitions, each of which is comprised of a variety of civil society organizations, including religious and human rights groups as well as trade unions. In total, about 250 groups are allied through the CCC structure, all of which are coordinated by the International Secretariat of the CCC in Amsterdam. In this section, we explain how the CCC came to acquire such a leading role, before discussing its relationship to other stakeholders in the anti-sweatshop field.

Table 1 • Organizations Interviewed

Organization	Type	# Interviewees	Location of Organization	Dates	# Interviews
Clean Clothes Campaign Secretariat	NGO, European	1	Amsterdam	2007, 2008, 2010, 2012	4
Clean Clothes Campaign Belgium	NGO, European	1	Brussels	2007	1
Clean Clothes Campaign Germany	NGO, European	1	Banz	2007	1
Clean Clothes Campaign U.K.	NGO, European	1	London	2007	1
Clean Clothes Campaign Netherlands	NGO, European	2	Amsterdam	2008, 2010	2
Clean Clothes Campaign France	NGO, European	1	Paris	2008	1
Fair Wear Foundation	MSI, European	1	Amsterdam	2008	1
Ethical Trading Initiative	MSI, European	1	London	2007	1
UNITE	Union, U.S.	5	New York	2008, 2010, 2012	5
International Labor Rights Fund	NGO, U.S.	1	Washington, DC	2012	1
USAS	NGO, U.S.	1	Washington, DC	2010	1
Fair Labor Association	MSI, U.S.	11	Washington, DC	2007, 2008	4 ^a
Worker Rights Consortium	MSI, U.S.	2	Washington, DC	2008	2
Social Accountability International	MSI, U.S.	1	Washington, DC	2012	1
Maquila Solidarity Network	NGO, Canadian	2	New York	2007, 2008, 2009	3
ETUF: TCL ^b	Union federation	1	Toronto	2012	1
ITGLWF ^c	Union federation	2	Brussels	2007, 2009	2
Unaffiliated activists ^d	NA	3	Various, U.S. and U.K.	2007, 2010	3
		N = 38			N = 35

^aincludes focus group interview with eight staff.

^bEuropean Trade Union Federation: Textiles, Clothing and Leather Workers.

^cInternational Textile, Garment, and Leather Workers' Federation.

^dIndependent activists, including those who had previously worked for a labor rights organization.

Genesis of the Movement

Antisweatshop activism in Europe began in 1989 with a consumer campaign against the European retailer C&A. Activists in the Netherlands burned clothes in front of a C&A store in support of women garment workers in the Philippines who had been dismissed after demanding to be paid the legal minimum wage. Because the factory in question was owned by a U.K. company, both Dutch and British activists became involved in the campaign. Adopting a tactic that would subsequently be repeated, European activists organized a tour for the affected workers in the United Kingdom and the Netherlands, holding press conferences to bring their plight to public attention (E5 2007; Sluiter 2009).

British and Dutch organizers of the C&A campaign built on preexisting relationships that they had established with women's, labor, human rights and other groups in the Philippines. In the Netherlands, transnational feminist connections were particularly important for the early anti-sweatshop campaigns and the eventual formation of the CCC. From the viewpoint of Northern activists, organizing around labor conditions in industries employing primarily female workers in developing countries was an expression of feminist solidarity, and one that responded to calls made by women's organizations from the developing world, especially in Asia. One of the founders of Development Alternatives with Women for a New Era (DAWN), a well-known network of feminist activists from the global South, issued such a challenge at an NGO forum in the mid-1980s attended by a Dutch activist who would go on to play a major role in the creation of CCC almost a decade later (E1 2008).

The decision to develop an antisweatshop organization grew out of the C&A campaign, and led to the formation of the CCC in Amsterdam in 1990. The decision was motivated by two main considerations. First, activists felt that the campaign, by generating so much publicity, had created a rare opportunity to educate and activate consumers around the sweatshop issue: "It became a very famous case . . . it almost became a national discussion about sweatshop issues, gender, labor issues, internationalization of employment, and the role of C&A . . . The campaign . . . struck a nerve" (E1 2007). By mobilizing around concrete situations involving specific people, consumer campaigns made visible and accessible a number of complex issues, including the intricacies of global supply chains, their implications for workers at the manufacturing links of the chain, and the "regulation gap" created by a system in which economic power (and hence, the CCC would argue, responsibility) was located far from the production base, in the hands of Northern corporations (E2 2007). Second, leading activists in the Netherlands saw coordinated campaigns as an opportunity to cooperate with more mainstream social movement organizations and trade unions: "When we officially started the CCC it was really positioned as a network, precisely with the aim to bring together different types of NGOs and trade unions, and to respect the political differences [between them]" (E1 2007).

A similar motivation led activists in other European countries to create antisweatshop coalitions, several of which became national affiliates of the CCC. European expansion was achieved via a CCC bus tour across France, Germany, Belgium, and the United Kingdom in 1995. En route, activists publicized the research they had conducted on labor conditions and the relationship between European companies and apparel manufacturers in eight Asian countries. Workers' representatives from six of these countries participated in the tour. In each European country visited, national CCC coalitions grew out of the work that local groups did to organize the event. The network continued to grow during the next five years with CCC coalitions created in Spain, Sweden, Switzerland, and Austria. Later Italy, Norway, Denmark, Poland, and Finland were added to CCC's roster of national affiliates, bringing the total number of European coalitions under the organizational umbrella of the CCC to 14 by 2010.

The Development of Multistakeholder Initiatives in the European Field

Public campaigns on behalf of garment workers exerted pressure on northern companies on a case-by-case basis, but by the early 1990s CCC activists began wondering how they could achieve

broader impact. Following lengthy internal discussions and exchanges with trade unions and Southern partners, the CCC opted to develop a code of conduct for companies, which was released in 1998 as the Code of Labour Practices (E2 2007). In the Netherlands, the CCC also took a leading role in the creation of a multistakeholder initiative, the Fair Wear Foundation (FWF), to insure the Code's meaningful implementation. Today, the private sector members of the FWF number around 50, predominantly Dutch, retail and clothing brands, though the organization has expanded to include a number of companies from other European countries, particularly Germany, Sweden, and Switzerland.

By developing and advocating adoption of the base Code, the CCC explicitly opted for what its organizers call an "oppose and propose" strategy. On one hand, through the FWF, the CCC works collaboratively with companies to promote positive changes in working conditions at their suppliers' factories. On the other hand, the CCC publicly exposes recalcitrant companies and pressures them to implement changes through negative publicity and consumer campaigns. While recognizing the tensions in this model, CCC organizers also emphasized the complementarity between the "oppose" and "propose" dynamics, arguing that the development and dissemination of the Code of Labour Practices established a baseline expectation of what workers, activists, and consumers looking to support the rights of garment workers should be able to expect.

The other major MSI in Europe, the Ethical Trading Initiative (ETI) was formed in 1998 in the United Kingdom. The ETI grew out of an informal network of activist organizations, including Oxfam and CAFOD (the U.K.-based Catholic Overseas Development Agency), as well as British and international trade union federations that started meeting in the 1990s to observe and analyze the development and implementation of corporate codes of conduct. This group drafted a proposal to create a multistakeholder organization that would bring private sector actors into a conversation with civil society groups about how codes could be made meaningful instruments for supply chain monitoring (E5 2007). The ETI was subsequently created with financial support from the British government's Department for International Development.

Like the FWF, the ETI is organized as a tripartite alliance of corporate, trade union, and NGO members, but unlike the FWF, which is an organization designed to verify code compliance, the ETI does not monitor its members' supply chains. Rather, it is based on a learning process model in which companies share best practices and commit to bringing their sourcing practices progressively in line with ETI's code (E7 2007; E14 2012). With approximately the same number of member companies as the FWF, the ETI includes several large retailers, such as Tesco and Marks & Spencer. Although the companies belonging to it are mostly based in the United Kingdom, its membership has expanded to other European countries, and the U.S.-based specialty retailer, Gap, is also a member.

Getting Along

Between 2000 and 2005, the CCC organized 184 campaigns in response to labor rights violations, of which 78 percent occurred in Asian factories (Merck 2007). Consistent with the oppose and propose philosophy described above, public campaigns were launched only when the CCC was (1) contacted directly by workers, or by local network partners in the global South acting on behalf of affected workers, and (2) when the company in question, upon being contacted by the CCC, was judged to be unresponsive. Thus, a public "name and shame" campaign is seen as a last resort, and one that is appropriate only when other avenues for convincing a company to address a problem have been exhausted.

Although CCC organizers use the oppose and propose language to describe the organization's interaction with companies, a subtler version of the same dynamic can be observed in its relationship with labor unions. On the one hand, securing the right of workers in the global South to exercise freedom of association has been among the main objectives of antisweatshop activism, and it is one of the most difficult to achieve: Freedom of association violations appeared in fully 75 percent of the campaigns the CCC organized between 1999 and 2003 (Dent 2005). By supporting

the efforts of developing-country workers to organize, antisweatshop activists arguably reinforce the importance of unions as a bulwark against labor abuses. However, organized labor has not always sided with the CCC in particular campaigns (E2 2007). Furthermore, there has been some tension between the CCC and labor unions regarding the degree to which the former may encroach on organized labor's turf, as when, for example, the CCC informally advocates for workers in their negotiations with the brand or retailer placing orders with a factory at the center of a campaign (E4 2007).

These concerns may be giving way to a greater appreciation on the part of organized labor for groups like the CCC, however. One European trade union official reflected on his own evolving views about the importance of NGOs dedicated to labor issues:

Originally trade unions felt that defending workers is the preserve of labor unions, but I have a different perspective on it now . . . Although trade unions are accepted as partners to business more [in Europe, compared with the U.S.], you can still get access to companies and do things working through an NGO or some other neutral organization that you can't do as a union (E15 2012).

Furthermore, given declining union density, organized labor has to be supportive of other kinds of labor-oriented civil society groups because these groups "at the end of the day want to reach the same goal as unions: [promoting] labor rights." For the most part, organized labor has played a secondary role within the European antisweatshop movement. In many European countries, textile and apparel unions have merged with other, generally stronger, unions, such as those in the chemical sector. As a result of these mergers, "textile unions don't really exist anymore and so it's not easy to organize people around these issues" (E15 2012).

The Antisweatshop Movement #2: The U.S. Case

As in Canada and Europe, the U.S. antisweatshop movement grew out of corporate campaigns against well-known companies linked to labor rights violations. However, unlike in Canada and Europe, some of the most high profile instances of sweatshop labor occurred at home, allowing the sweatshop issue to be identified as a problem confronting workers in North and South alike. This framing resulted from the strategic efforts of organized labor, and especially the main apparel industry union, UNITE, to link the globalization of apparel production to labor struggles at home and abroad.¹

Genesis of the Movement

One of the earliest corporate targets of U.S. antisweatshop activism was Nike, whose shoe factories in Indonesia became a focus of scrutiny in the early 1990s. Jeff Ballinger, an activist and labor organizer who moved to Indonesia in 1987 to work with the Asian American Free Labor Institute, a union-affiliated organization funded by the AFL-CIO, engineered the Nike campaign.² Although numerous articles alleging sweatshop conditions at Nike's supplier factories in Indonesia appeared between 1992 and 1994,³ the sweatshop issue did not receive sustained attention in the United States until August 1995. What finally forced it into the national spotlight was a dramatic raid by government agents to free more than 70 immigrants who were being detained in a factory

1. The Union of Needletrades, Industrial, and Textile Employees (UNITE) was formed in 1995 out of the merger of the two major unions in the U.S. garment industry: the International Ladies' Garment Workers Union and the Amalgamated Clothing and Textile Workers Union.

2. The AAFLI was one of four regional institutes affiliated with the AFL-CIO and funded largely by the U.S. government to encourage the development of anticommunist labor movements in developing countries. In 1995, the regional institutes were consolidated and renamed the American Center for International Labor Solidarity, or Solidarity Center. On the history of the free labor institutes, see Spalding 1989.

3. Jeff Ballinger later co-edited a collection about Nike's activities in Indonesia (see Ballinger and Olsson 1997).

compound in the southern California town of El Monte. The workers, who had been smuggled into the United States from Thailand, were forced to work in a garment factory subcontracting for well-known retailers (Esbenshade 2004).

That same summer the National Labor Committee (NLC), an organization with close ties to organized labor,⁴ launched a major campaign against Gap following accusations that workers at Mandarin International, a Gap contractor in El Salvador, had been fired in retaliation for organizing activity. In spring 1996, the NLC exposed yet another case of sweatshop labor in Central America. This time the NLC uncovered hazardous working conditions and labor law violations, including underage workers, in a Honduran factory making clothes sold at Wal-Mart under the Kathie Lee label. Shortly thereafter, the apparel industry union UNITE announced its discovery that Kathie Lee products were also being made in a New York City apparel factory by undocumented workers from Latin America who had not been paid in weeks.

The administration of U.S. President Bill Clinton responded to the wave of embarrassing sweatshop scandals by convening the Apparel Industry Partnership (AIP), a forum intended to promote dialogue among NGOs, companies, and trade unions about working conditions in the clothing industry. It quickly became clear that the central focus of the AIP would be the elaboration of an industry-wide code of conduct—a model that had first been proposed by the NLC following its exposé of sweatshop conditions at an El Salvadoran factory supplying Gap. Initially, the idea of a code that could be independently monitored and verified enjoyed support from organized labor and from NGOs, and participants in the AIP set to work debating what the code should include (US11 2010; US12 2010).

Although the early rounds of negotiations proceeded smoothly, a number of serious disagreements emerged about specific clauses, including those regarding wages (specifically, if the code would specify a living wage), maximum working hours, and organizing rights. In June 1998, the unions and the NGOs, then negotiating together, sent a counterproposal to the companies, to which there was no response. At some point during the stalemate that followed, several of the NGOs began meeting with the companies to continue negotiations (US1 2008; US14 2012).

It was not until November 1998 that a final agreement, including a framework for monitoring the new code, was announced. However, this agreement was not reached with the participation of all the original members of the AIP: a group that included both unions and one of the participating NGOs had been absent from the last stage of discussions, after criticizing what they considered to be the private sector's excessive influence over the emerging instrument. This faction declined to endorse either the final code or the monitoring system that was proposed to insure compliance with it. The split within the AIP was a formative moment in the historical development of the antisweatshop field in the United States, resulting in the emergence of two distinct multistakeholder initiatives.

The Development of Multistakeholder Initiatives in the U.S. Field

The November 1998 agreement marked the concluding phase of the Apparel Industry Partnership and the first stage in the creation of its successor organization, the Fair Labor Association (FLA). Created to serve as the monitoring and implementation arm of the new industry code, the FLA counted among its members several, though not all, of the companies that were active in the AIP, as well as NGOs and university administrators involved in the licensing of collegiate apparel. Absent among the members of the FLA are those former participants of the AIP that were critical of the final agreement, including the apparel industry union UNITE. Following the creation of the FLA, these critics were quick to fault the new organization for being insufficiently independent from the industry whose behavior it was supposed to monitor. At the same time, critics realized

4. The NLC, which was established in 1980 as the National Labor Committee in Support of Democracy and Human Rights in El Salvador, investigated and publicized the political persecution and abuse of labor leaders by the El Salvadoran government and paramilitaries (see Krupat 1997).

the importance of developing a proactive alternative to the FLA model so they weren't in the "position of just saying no" (US12 2010).

Two organizations, UNITE and United Students Against Sweatshops (USAS), were instrumental in creating an alternative. These organizations were themselves closely linked: USAS grew out of an internship program, Union Summer, which the AFL-CIO launched in the mid-1990s to create a cadre of students with organizing experience who could become active in promoting labor issues on their college campuses. Alumni of this program took up the sweatshop issue, organizing fellow students and pressuring university administrators to disclose information about the conditions under which their school's licensed apparel was being produced. In order to facilitate communication and activities among a burgeoning number of antisweatshop groups, USAS was founded with UNITE's strategic and financial support in spring 1998 (US9 2010; US10 2010).

Again with the support of UNITE, USAS members began to work with a number of academics and NGOs to create an alternative monitoring model that would be completely independent from the industry, unlike the FLA, whose operating budget is drawn largely from the membership fees paid by participating companies. Following the creation of this new organization, the Worker Rights Consortium (WRC), in 2000, USAS members pressured college administrators to join. As of August 2012, 180 universities and colleges were affiliated with the WRC, and approximately 172 universities and colleges were affiliated with the FLA. These memberships overlap to some degree, since many schools belong to both.

Getting Along

The landscape of antisweatshop politics in the United States is more fractured than in the other cases discussed in this article. No single NGO plays a role analogous to that of the leading antisweatshop groups in Europe and Canada, and the large number of NGOs that have been active around the sweatshop issue at different times and in different regions have done so in the absence of an overall coordinating body of the sort that the International Secretariat of the CCC represents. For example, peace activists that had been active in Central American solidarity movements during the 1980s played a leading role in some of the campaigns involving that region (Wimberly 2009), while immigrant rights groups were a key part of antisweatshop coalitions in California (Cummins 2009). As one long-time U.S. activist explained, during the heyday of the movement in the late 1990s, "other NGOs with an international focus came in once the sweatshop issue was out there because they saw it as a great teaching tool." Although some of these groups "weren't in it for the long haul," they saw the sweatshop issue as a way to educate people about the political economy of globalization and the kinds of relationships it creates between workers in the global South and consumers in the North (US11 2010).⁵

One of the key features complicating the U.S. landscape as compared with the European and Canadian cases is the coexistence of two distinct, and to some degree competing, MSIs. Now more than a decade old, the FLA recently focused on developing what it calls a sustainable compliance program. This program, FLA 3.0, aims to build compliance into the everyday operations of factories rather than relying on periodic audits, which may identify incidents of noncompliance but do little to address their root causes. Officials at the FLA acknowledge the organization's ongoing reassessment of its mandate in light of the evolving debate about codes of conduct and growing skepticism about the ability of the traditional monitoring model to combat sweatshop conditions (US4 2008; US6 2008).

Critics of the FLA maintain that the causes of noncompliance are well-known and are to be found in the sourcing practices of the brands and retailers buying apparel from developing-country

5. The same characterization can be applied, though to a lesser degree, to the European and Canadian movements. Several of our European informants mentioned that large NGOs like OXFAM tended to move on to other "hot" topics (e.g., climate change) once the initial wave of public (and perhaps more critically, donor) interest in the sweatshop issue subsided (E5 2007; E6 2007).

suppliers. The Worker Rights Consortium has placed the sourcing practices of buyers, and particularly the price they pay to the manufacturers of their garments, at the center of its proposal to create a Designated Suppliers Program (DSP). Under the DSP, collegiate licensees would agree to develop longer-term, more stable relationships with a small number of select factories that would promise to insure higher labor standards, including a living wage. Although the DSP was put on hold after officials at the Bush-era Department of Justice found it inconsistent with U.S. antitrust law, the WRC has rolled out a pilot project that attempts to implement elements of the DSP model with a volunteer company (Greenhouse 2010).

The Antisweatshop Movement #3: The Canadian Case

In Canada, the main social movement organization advocating on behalf of garment workers is Maquila Solidarity Network (MSN), which was established in 1994 by two longtime activists coming from a feminist and a labor union background, respectively. Together MSN's founders had numerous relationships with Mexican and Central American groups, including the tri-national women's collective *Mujer á Mujer* and a Canadian network of trade union activists promoting labor solidarity with maquila workers, *SolidarityWorks*. MSN was established in the midst of negotiations over the North American Free Trade Agreement, and one of the organization's goals was to bring the voices of Mexican workers into the discussion in order to build solidarity between them and their Canadian counterparts.

Genesis of the Movement

MSN's initial engagement with antisweatshop activism in the clothing industry occurred in 1995, when it participated in the Gap campaign described earlier. Involvement in this campaign provided a rapid tutorial on the organization of clothing production and the reliance of lead firms on global supply chains. One of MSN's founders explained that "[w]e didn't understand until then the power of the brand, and the fact that you could influence a company because of its brand sensitivity and vulnerability" (C1 2007). That understanding "changed how we work, set new directions, and connected us to a whole new movement, including the CCC" (Ascoly and Finney 2005:89).

Although MSN progressively enlarged the geographic scope of its activism, its historical connections to groups in Mexico and Central America influence how the organization perceives the implications of global production. For example, the shift in the industry's center of gravity to Asia is largely assessed from the perspective of its consequences for workers in Latin America. Just as MSN worked to overcome rivalry between Mexican and North American workers during the NAFTA debate, so has it sought to develop connections between Chinese garment workers and their Latin American counterparts in order to build labor solidarity and lessen the sense of competition created by employers' relocation strategies.

Insofar as it has sought to build broad-based coalitions around the sweatshop issue, MSN has modeled itself after the Clean Clothes Campaign (C3 2010). It played an important role in creating the Ethical Trading Action Group in 1998, an alliance of faith-based organizations, trade unions, student groups, and development NGOs such as OXFAM Canada. Through the Ethical Trading Action Group, MSN launched efforts to spread antisweatshop initiatives across Canadian states using a CCC-type of strategy, but without establishing formal linkages across local coalitions of the sort that are coordinated by the CCC Secretariat. Around the same time, MSN began working with CCC in critically assessing the implementation of codes of conduct in the face of proliferating standards. MSN produced and distributed a series of "Code Memos" and other reports summarizing key developments with regard to codes of conduct in the global apparel industry. Through extensive research on various monitoring and compliance initiatives in multiple countries, MSN developed expertise in this area, which enables it to provide periodic guidance and input to MSIs (E12 2010).

Maquila Solidarity Network also participates in a variety of transnational campaigns coordinated by organizations in the United States and Europe, and its historical relationships with groups in Latin America often prove valuable in such circumstances. For example, in 2001 MSN was involved in a campaign targeting Kukdong, an Asian-owned factory in Mexico working as a contractor for Nike. MSN played a role in convincing Nike to publicly support freedom of association at its supplier's factory, which in turn, led to the formation of the first independent union to emerge out of an international labor rights campaign in Mexico. At the same time, participation in campaign networks coordinated by CCC has brought MSN into contact with local stakeholders in other regions, and in this sense, involvement in transnational advocacy networks has enabled both CCC and MSN to expand their network of relationships with groups in the global South, while maintaining the historical ties that they have built over time with partners in particular regions: "We complement each other . . . We have developed through CCC links with groups in Asia and Africa but they're not as strong as CCC's, and the same is true for CCC in Latin America" (C1 2007).

Getting Along

Inspired by the model of the Apparel Industry Partnership in the United States, MSN initially sought to establish a federal taskforce to evaluate the sweatshop problem and consider possible solutions. This effort was unsuccessful, however. Although MSN did manage to initiate a dialogue with some companies, the substance of those conversations quickly narrowed to developing a voluntary code of conduct, as opposed to other possible approaches to the issue, such as public regulation (C2 2008). Furthermore, companies in Canada had adopted highly conservative positions in the code of conduct debate, leading organized labor in Canada to reject further negotiations. In part, the greater intransigence of Canadian companies was due to the fact that they had not been exposed to major public campaigns of the sort that large U.S. and European brands had already experienced. At the same time, the retail and industry associations that represented companies in these negotiations included among their members some U.S.-based companies, such as Wal-Mart, that had been among the most reluctant to engage with the antisweatshop movement during its formative period (C3 2010).

With efforts to create a Canadian MSI unsuccessful, and in the context of a clothing market dominated by U.S.-based companies, MSN opted to work closely with other MSIs, particularly the Fair Labor Association. The relationship between the FLA and MSN has evolved over time, and in some ways the contours of this relationship resemble the oppose and propose strategy employed by the CCC. On the one hand, MSN has adopted a fairly adversarial position towards FLA member companies, as when it organized a protracted campaign against the Montreal-based company Gildan, which became one of the few Canadian companies belonging to a major MSI after joining the Fair Labor Association in 2003. On the other hand, when the company later signaled its willingness to address the problems identified by MSN and its partners, MSN worked with the FLA, as well as Gildan, to negotiate details of a remediation plan (C1 2007). Most recently, the relationship between MSN and FLA has evolved yet again, with the current director of MSN accepting one of the seats reserved for civil society organizations on the FLA's board.

In contrast to the more contentious relationship between the private sector and some U.S. antisweatshop groups, MSN tries to balance participation in an MSI and engagement with the private sector more broadly with periodic campaigns against companies. Like CCC, the leadership of MSN believes that confrontational and collaborative approaches can reinforce each other. For example, in 2002 MSN was involved in a campaign in support of the Lesotho garment workers' union in Africa. Both MSN and UNITE targeted Gap, and one MSN organizer emphasized the different but complementary Canadian and American approaches: "[O]urs [our campaign] was more *engaging with* Gap and they were *campaigning against* Gap. And it actually worked well, we were able to persuade Gap to facilitate a dialogue between the employer and the union" (C1 2007). While MSN values what it considers to be a positive relationship with organized labor, it also seeks to develop and sustain relationships with other types of social movement organizations, both in Canada through the Ethical Trade Action Group coalition, and in the global

South: "We are quite supportive of worker's organizing as well, but we think there's also a role that women's organizations are playing in terms of worker training, NGOs giving advice and assistance to workers, there are issues of national regulations, what kind of regulation can be created through MSIs, etc." (C3 2010).

The Institutional Embeddedness of Global Activism

Two significant findings emerge from our comparative analysis of antisweatshop activism in the United States, Canada, and Europe. Among these cases, we find variation in (1) the kind of organizations that played a leading role in galvanizing public attention around the sweatshop issue, and (2) the composition of the multistakeholder initiatives that evolved out of this initial movement. Insofar as our findings reflect the particular institutional contexts out of which antisweatshop activism emerged, including the dominant patterns of coordination and conflict characterizing interactions among stakeholders in these political economies, they are broadly consistent with the varieties of capitalism framework. In Peter Hall and David Soskice's (2001) typology of capitalisms, the United States is the exemplary liberal market economy, in which a market-oriented pattern of coordination dominates and labor-capital relations are more conflictual, while most European countries are closer to the ideal type of the coordinated market economy in which corporatist institutional configurations produce more collaborative relations between stakeholders. As we elaborate below, this framework is useful for making sense of which social groups were most active in publicizing the sweatshop problem, how relations among stakeholders evolved as this activism coalesced into a movement, and how activists evaluate their prospects for effecting change in apparel supply chains.

Getting off the Ground: Diverse Origins and Leadership

The type of organization that was most important in defining the sweatshop issue as a social problem worthy of mobilization differed across our cases. In Europe, civil society organizations, especially feminist and religious groups, were responsible for cultivating public awareness of labor rights and working conditions in the global apparel industry. The heterogeneous composition of the national CCC chapters across different countries underscores the broad NGO coalitions involved in antisweatshop activism in Europe.

While most scholars have emphasized the importance of consumers and activists, especially students, for the emergence of the labor rights movement in the United States (Featherstone 2002; Silvey 2004), organized labor played a critical and underappreciated role, both by leveraging the publicity generated by a succession of sweatshop exposés, and by mobilizing other constituencies, particularly student activists, around the sweatshop issue. The sweatshop issue emerged at a time when the apparel industry union, UNITE, was confronting numerous challenges, including increasing import penetration of the U.S. clothing market, the decline of garment production in the union's traditional stronghold of the northeast, and growth in nonunion apparel shops on the west coast (Esebsnhade 2004). In response, the union had launched a major organizing drive targeting nonunion apparel factories in southern California as well as in Central American and the Caribbean.⁶ Because the union was already working and organizing in these regions, UNITE was well positioned to identify and publicize the sweatshop scandals described above (US10 2010;

6. For much of the twentieth century, fear of being associated with Communism sharply circumscribed the internationalist attitudes and activities of the U.S. labor movement. In this sense, the collapse of the Soviet bloc created a political opening in which American unions could pursue alliances with a more diverse range of labor groups in the South, and UNITE was in the process of restructuring and further developing its international activities during the formative period of the antisweatshop movement in the mid-1990s. However, it is important to note that the efforts of American union officials to develop new relationships with civil society organizations in developing countries have been complicated by a legacy of distrust, which stems from the complicity of organized labor with American foreign policy during the Cold War.

US14 2012). Much more so than their European and Canadian counterparts, American unions forged a discursive link between labor abuses abroad and labor rights at home (US13 2012).

Yet the union's dominant role in framing the sweatshop problem in the United States is a reflection not of labor's strength, but rather its lack of institutionalized power. The American industrial relations system produces a labor movement that focuses on a time- and resource-intensive strategy of factory-by-factory organizing (C3 2010; US14 2012). These kinds of organizing efforts are, in turn, subject to antiunion campaigns launched by employers who, when benchmarked against most European and to a lesser extent Canadian companies, exhibit strong opposition to organized labor. In this context U.S. union leaders sought to combat an assault on organizing rights by linking declining union density and deteriorating workplace conditions on the domestic front with the plight of workers in foreign sweatshops. It was thus only in the United States that the sweatshop issue was defined as a national as well as an international social problem that affected Americans as workers, not just as consumers.

In contrast, the more entrenched position of organized labor in Europe's institutional settings provides weaker incentives for Northern unions to tackle working conditions in informal, weakly organized workplaces such as domestic sweatshops, and heightens potential conflicts of interests between unions' role as workers' representatives in lead firms and their possible involvement in workplace battles in the developing-country factories supplying those lead firms. For example, during the negotiations that followed an antisweatshop campaign involving workers in Matamoros, Mexico who were producing apparel for the German sportswear brand PUMA, a major German labor union sided with PUMA against the CCC and the workers (Palpacuer 2009). In another case, a major French union withdrew from a campaign against French retailers coordinated by the national CCC (E11 2008). While the leadership of the international union federation for the apparel sector, the International Textile, Garment, and Leather Workers' Federation, has been active in many specific campaigns involving workers in the global South, national or regional unions in Europe have been less involved (US13 2012; US 14 2012).⁷ The leadership role has been played by the CCC, which, like its Canadian counterpart MSN, sees its principal role as one of working in solidarity with partner organizations in developing countries.

As Canada's leading antisweatshop organization, MSN is the creation of two activists, one whose background is in organized labor and another with a long history of feminist solidarity work in Central America. In this, as in other respects, the Canadian experience resembles a cross between the European case, in which antisweatshop activism was driven by a broad-based coalition of civil society groups, and the U.S. case, in which unions provided strong leadership. This hybrid status is also consistent with our comparative institutional argument: While Canada is classified as a liberal market economy by Hall and Soskice's (2001) typology, it represents a more moderate form of economic liberalism that includes "effective mechanisms for the participation of a range of stakeholders" (Konzelmann, Fovargue-Davies, and Schnyder 2012:519). Thus, to the extent that the Canadian political economy represents something of an intermediate form between the United States and Europe, this is also an accurate description of the country's anti-sweatshop movement. Hence, the first finding to emerge from our comparative analysis regarding the leadership roles of different organizations can be explained by the different industrial relations regimes prevailing in each context.

From Protest to Participation: The Uneven Evolution of Multistakeholder Initiatives

Just as Canadian, U.S., and European activists drew on similar repertoires of contention in getting the antisweatshop movement off the ground—specifically, corporate campaigns targeting

7. Cases or campaigns involving countries in greater Europe (central and eastern European countries, Turkey) are an exception to this general rule (E15 2012).

companies associated with sweatshop conditions—so too did their efforts become similarly institutionalized in the form of multistakeholder initiatives. However, our study reveals considerable differences in how MSIs developed in North America and Europe: While *both* of the leading European MSIs, Fair Wear Foundation and Ethical Trading Initiative, claim among their members companies, unions, and NGOs, the same is not true of *either* of the two leading U.S. initiatives that grew out of the AIP. Companies are absent from the WRC, and although the governing structure of the FLA allows for the participation of organized labor, to date the seats on its governing board allocated for civil society representatives have been filled exclusively by NGOs as opposed to trade union representatives (US5 2008).

This difference in the composition of MSIs affects the ways in which activist groups orient themselves towards the other stakeholders in the antisweatshop field. The oppose and propose strategy adopted by CCC and MSN enables them to combine confrontational actions against companies during campaigns with regular collaboration through multistakeholder initiatives. In contrast, the leading organizations in the U.S. antisweatshop movement represent different elements of the oppose and propose model: the WRC sees its role as one of providing a counterweight to companies, while the FLA develops its policies in consultation with company members, as well as with the NGO members on its board of directors (US7 2008; US8 2008).

Despite the strong leadership provided by organized labor, the sweatshop movement in the United States has been less cohesive than in the other two cases, a fact noted by several of our informants from Europe and Canada in the context of reflecting on their participation in international campaigns involving U.S.-based groups: “It’s very uneven in the U.S.; there are more initiatives and they don’t always work together. It’s not like Europe where CCC is really ‘the’ group in each country and not like Canada where MSN is probably the only main group in the antisweatshop movement [leading a coalition] including others” (C3 2010). This view was echoed by one of our American informants, who regretted the absence of a more coordinated approach in the United States: “We need something like the CCC in North America. We haven’t created it here. All [the groups] for the most part work alone, raise their own money. There is no system for setting a common agenda, saying ‘these are the most important fights’” (US2 2008).

The varied composition of the MSIs that grew out of antisweatshop activism in the United States and Europe reflect differences in the coordination patterns of these political economies. One Dutch activist attributed the success of the Fair Wear Foundation, which was created by the CCC as a collaborative effort between labor, business, and civil society groups, to a national predisposition for joint problem solving: “In a way that’s a relatively Dutch sort of approach, because for Dutch people it doesn’t sound like an odd thing to have these employers and NGOs and unions in a foundation to collectively try and figure out what to do” (E1 2007). In comparative context, however, this appears to be more of a pan-European than a specifically Dutch orientation; the tripartite composition of Europe’s leading MSIs, the Fair Wear Foundation and the Ethical Trading Initiative, represents a modified form of the corporatist structures found in most European political economies, with NGOs substituting for the state. Thus, the governance structure of FWF and ETI can be seen as a logical extension of the social dialogue model governing relations between labor and the private sector in Europe, albeit to a greater or less degree across different countries within the region (Keller 2003; Regini 2000).

In contrast, American activists cannot draw on a similar tradition of social dialogue. One U.S. NGO official observed that the European unions “believe they can sit down and negotiate with a company because they have had some success doing that in the past. The U.S. unions are more combative and distrustful because that’s their experience” (US13 2012; also E15 2012). Another American labor rights activist emphasized the specificity of the U.S. context, where the “raw struggle between capital and labor has produced a unique movement. There is less belief that corporations will follow through, less good faith” (US9 2010). An American union organizer who has been involved in many campaigns involving international groups expressed “the greatest respect for CCC” and acknowledged that its oppose and propose strategy is frequently effective; nevertheless,

he expressed doubt that a similar approach could work in the more confrontational U.S. context (USIO 2010).

Although Canada inherited a factory-by-factory organizing system comparable to the U.S. one, the cultural orientations of the union movement and the broader political context around labor issues facilitate a more inclusive approach. Fragmented coalitions, such as the ones formed around the FLA and WRC in the United States, rarely emerge in this country where social movement campaigns instead tend to feature two national coalitions—one French-speaking for Québec and another for the rest of Canada. Nevertheless, relationships with corporations remain more adversarial than in Europe, as revealed by the absence of a specifically Canadian MSI, which in turn led the leading NGO, MSN, to become involved in the Fair Labor Association.

So far, we have suggested that our findings are consistent with an institutional explanation that emphasizes the ways in which political economies shape patterns of interactions among stakeholder groups. However, our results do not concur with the varieties of capitalism framework in one important respect. In Hall and Soskice's (2001) typology of varieties of capitalism, the United Kingdom is considered a liberal market economy that differs markedly from its continental neighbors. In contrast, our research uncovered a British antisweatshop movement that much more closely approximates the European than the American model. In fact, British activists played a key role in the emergence and growth of the European antisweatshop field. As noted above, it was a joint U.K.-Dutch campaign in defense of Filipino workers that led to the creation of the CCC. The British activists involved in that campaign not only created the coalition of NGOs that became the U.K. affiliate of the CCC, but they also went on to play a major role in the creation of the Ethical Trading Initiative, which has the same tripartite governance structure as Fair Wear Foundation, the MSI founded by the CCC.

One apparent similarity between the British and the U.S. antisweatshop movements is that both feature MSIs created with government support. Yet here, too, the U.K. experience is consistent with the European pattern; while the U.S. cabinet official who presided over the government-sponsored initiative resulting in the FLA was Robert Reich, the Secretary of Labor, an analogous, albeit less prominent role was played in Britain by Clare Short, the Development Secretary. This is consistent with the dominant framing of the sweatshop problem in the United States, where unions succeeded in making it an issue about labor exploitation and workers' rights, while in Europe sweatshop conditions were often linked to broader development themes, such as the empowerment of Southern communities or women's and human rights.

Finally, the geography of the commodity chains coordinated by lead firms played a role in linking antisweatshop activists in the United Kingdom to developments in the rest of Europe. Turkey is a major sourcing destination for European companies, including those based in Britain, as are a number of other countries in Eastern Europe and North Africa (Gibbon 2002; Palpacuer et al. 2005). Major American brands and retailers, in contrast, tend to source heavily from Latin America—a region that is of marginal importance for European firms. The cooperation between British and continental activists was thus motivated by the specificities of regional sourcing patterns, including the importance of re-imports through countries such as Germany and Belgium into the rest of Europe, as explained by a European activist: "U.K. brands also are more connected to Europe than to the U.S. There's a lot of sourcing that goes on through Germany, so in a way these struggles follow the brands. They have to" (E14 2012).

Thus our findings do not align perfectly with the varieties of capitalism perspective insofar as we find that activist organizations in the United Kingdom have embraced a "European" tripartite model of social dialogue instead of the competing coalition strategy that characterizes antisweatshop politics in its fellow liberal market economy, the United States.⁸

8. As noted, our finding that the British antisweatshop movement more closely fits the European pattern than the American one is in tension with the traditional varieties of capitalism framework. However, it is consistent with recent contributions to the comparative institutionalism literature that emphasize the existence and conceptual significance of variety "within" a type of capitalism (Peck and Theodore 2007; Wood and Lane 2011).

Conclusion

Despite our emphasis on the diverse origins and trajectories of the antisweatshop movement within the global North, there has been some convergence within this field. Organized labor, which played such a central role in the emergence of the U.S. antisweatshop movement, has become far less visible and less active around these issues. In the years after the merger of the apparel industry union, UNITE, and the union representing hotel and service workers, HERE, union leaders who saw little future for the domestic apparel industry shifted resources away from trying to organize garment workers in favor of targeting related facilities such as industrial laundries (US15 2012). As the union's commitment to the issue has waned, the role of organized labor in the U.S. and European movements has become more similar.

Some convergence is also evident at the level of the MSIs. In section two we briefly mentioned the Business Social Compliance Initiative, which was created in 2003 by a European industry group called the Foreign Trade Association. When it was launched, the BSCI departed from the tripartite structure of Europe's leading MSIs in that it did not include trade unions or NGOs in its governance structure. Activists have been highly critical of the group, which they regard as a sector-wide, private CSR program designed to give companies an alternative to joining initiatives like ETI and FWF that enable genuine multistakeholder engagement (US13 2012; US 15 2012; E14 2012). The BSCI has since invited civil society groups to sit on its stakeholders' advisory council, but several NGOs, including CCC and Oxfam, have refused to participate on the grounds that the Council has no real power to influence the organization's development (Egels-Zandén and Wahlqvist 2007; Fransen 2012). Thus insofar as BSCI is understood as a business-oriented organization suffering from a credibility deficit with activists, it suggests that the tripartite social dialogue approach to sweatshop issues is no longer the only model existing in the European field.

In the United States, meanwhile, a multistakeholder organization called Social Accountability International (SAI) could be seen as an alternative to the competing coalition model represented by the FLA and WRC. This organization was created in 1997 in the context of the debate about how to effectively implement and monitor codes of conduct. Its founders developed a methodology to improve the effectiveness of compliance monitoring worldwide, the heart of which is SA8000, an auditable social certification standard that was developed in consultation with numerous groups, including ETI, CCC, and the International Textile, Garment, and Leather Workers' Federation. As an organization primarily devoted to training auditors and developing social compliance standards, SAI is not strictly comparable to the other MSIs we have discussed, which either perform their own monitoring of code compliance (e.g., FLA, FWF) or investigate allegations of noncompliance with codes (WRC). Yet, SAI is similar to the European MSIs insofar as its governance structure includes companies, NGOs, and unions, and in this sense, the existence of a U.S.-based MSI with a tripartite composition might be interpreted as another indication of convergence (US15 2012).

Elements of SAI's experience also reinforce our argument regarding the differences between European and American approaches to the sweatshop issue, however. For example, SAI officials note that although there are seats on SAI's board reserved for organized labor, some U.S. unions are wary of participating. Additionally, although SAI claims both American and European companies as members, several activists noted that the participation of European companies on SAI's board has been a critical factor allowing the organization to include more rigorous standards in SA8000, including a living wage clause (US13 2012; US15 2012).

To the extent that American and European companies differ with regard to their participation in MSIs, one NGO official suggested this might reflect cross-regional variation in the dominant framing of the sweatshop problem. Insofar as the sweatshop issue is presented as part of a broader agenda of social and economic development, it may provoke less resistance or defensiveness from European business than it does in the United States, where it has been so closely linked to the domestic struggle for worker's rights (US15 2012). Thus, while some convergence is occurring within the antisweatshop field, the differences we identified among European and North American movements continue to shape these developments.

Accordingly, the key conclusion emerging from our analysis is that, while the global apparel industry is the organizational field in which antisweatshop activists formulate their strategies and negotiate interactions with other stakeholders, the way that actors orient themselves in this field is profoundly shaped by the distinct political cultures and institutional environments from which their activism emerges; these delimit and influence how the sweatshop issue is framed, by whom, and towards what ends. Consequently, efforts to globalize protest and organize across borders necessitate a coming to terms on the part of stakeholders with the historical and institutional specificity not just of the world around them (Kurzman 2008; Meyer 2004), but the country around them. Because it influences the strategies of activists, the attitudes of consumers, and the responses of corporations to the sweatshop issue, the national context will continue to shape emergent efforts in Northern countries to regulate working conditions and secure labor rights in a changing world economy.

Finally, although our study focuses on the global North, the findings have implications for “the other half” of the global antisweatshop movement. Future work could extend our approach by analyzing the various forms of activism that have emerged in parts of the global South, particularly in Asia and Latin America, and perhaps also in explaining the relative scarcity of such initiatives in other regions that play a role in global supply chains, including parts of Africa and Eastern Europe. In short, understanding how activists’ domestic political terrain shapes their interpretations of a social problem, their assessments of the possibilities for achieving meaningful change, and their willingness to collaborate with other stakeholders may, in the end, be a necessary condition for building and sustaining global social movements.

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