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## **Scaling Up? TRANSNATIONAL LABOUR ORGANISING IN GLOBALISED PRODUCTION**

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JONA BAUER, ANNA HOLL

**Workers' Power through Transnational Industrial Relations Agreements? A Global Framework Agreement and the ACT Initiative in the Garment Sector**

*ABSTRACT* This article analyses the impact on workers' power of two Transnational Industrial Relations Agreements (TIRAs) in the garment industry. A company-based Global Framework Agreement (GFA) is contrasted with the Action, Collaboration, Transformation (ACT) Initiative, which includes more than one lead firm and more extensive commitments. By applying a Power Resource perspective, we explore how vertical and horizontal power relations shape the implementation of both agreements, and how the agreements in turn affect those power relations. The research focuses on the implementation of the GFA and ACT in Bangladesh and Cambodia, respectively, drawing on document analysis and interviews with key stakeholders. We conclude that the GFA allows workers to pressure employers to comply with basic labour standards but also helps lead firms to better contain labour struggles and monitor their supply chain. ACT, in its design, gives unions the power to negotiate structural issues and therefore increases workers' power to a greater extent. However, ACT has so far lacked successful implementation. While both institutional approaches have the potential to influence asymmetric power relations in the garment sector, they have not, so far, substantially changed them.

*KEYWORDS* transnational industrial relations, trade union power, global production networks, garment, social upgrading

## **I. Introduction**

The Covid-19 pandemic and its effects on garment workers have shown once more how fragile garment workers' rights in global production networks (GPN)<sup>1</sup> are. When fashion stores in the global North closed due to lockdown regulations, garment lead firms used emergency provisions in purchasing contracts to cancel orders of already produced clothes. In this way, financial losses were passed on to the weaker actors in GPNs. Thousands of supplier factories in the global South had to shut down, and millions of garment workers lost their jobs and incomes (Anner 2020a). This mode of crisis handling renders a mode of production visible, which is characterised by highly asymmetric power relations between global apparel lead firms, their suppliers, and workers. Despite these asymmetries, however, an alliance of global and local civil society organisations successfully pressured garment lead firms to at least pay for orders placed prior to the crisis (Pay Up Campaign 2020).

Low wages and poor working conditions, such as health and safety issues, gender-based discrimination, and harassment of trade unionists, are central concerns in GPN research (e.g. Arnold 2014; Plank et al. 2014; Rossi et al. 2014). Social upgrading subsumes strategies to improve the working conditions and livelihoods of workers in GPNs, for example through enforcement of national labour laws and collective bargaining (Barrientos et al. 2011; Milberg/Winkler 2011). Both of these traditional routes have limits in GPNs, as they only target capital at the places of production, namely suppliers which directly employ the garment workers, and not the lead firms in the global North. Supplier companies, however, have limited power and resources to increase wages and change the mode of production, as the working conditions are strongly influenced by the purchasing practises of Transnational Corporations (TNCs) (Marslev 2019; Anner et al. 2013).

Mechanisms of global labour governance seek to address these issues and regulate working and employment conditions in GPNs, for example through Corporate Social Responsibility (CSR) standards. However, such standards have proven insufficient in securing substantial social upgrading due to their voluntary nature, limited participation by labour actors, and the neglect of the conflict of interests between capital and labour (e.g.

Barrientos/Smith 2007; Egels-Zandén/Merk 2014; Miller et al. 2010; Zajak 2017a). An alternative to CSR are initiatives involving trade unions, represented at the global level by Global Trade Union Federations (GUFs) such as the IndustriALL Global Union. Such instruments are promising but difficult to establish in the garment industry, due to a monopolistic buyer market and an abundance of garment suppliers, resulting in huge power asymmetries (Gereffi et al. 2005).

In our research, we analyse two Transnational Industrial Relations Agreements (TIRAs) (Ashwin et al. 2020) between GUFs and TNCs. One is a Global Framework Agreement (GFA), the other is the Action, Collaboration, Transformation (ACT) agreement. The GFA under analysis is signed by one TNC to secure basic workers' rights in the GPN of the TNC. ACT, in contrast, is a multi-firm TIRA signed by 20 TNCs and aims at addressing the root causes of low wages and poor working conditions by transforming the purchasing practises of the participating TNCs and establishing sectoral collective bargaining.

By integrating the Power Resource Approach (PRA) and multiscalar labour agency and applying them to the two TIRAs, we explore how vertical and horizontal power relations between labour and capital shape the agreements, and how they in turn affect those power relations. The second aspect cannot be addressed equally for both TIRAs, as they vary in their degree of institutional implementation. We analyse two TIRAs from an action-centred perspective, looking at agency spaces of workers and their representatives. This is inspired by the shift in global labour studies from regulatory towards social movement-oriented perspectives and the understanding of working conditions as an outcome of power struggles (Brookes/McCallum 2017).

While both TIRAs apply in various countries, the analysis focuses on their implementation in Bangladesh and Cambodia, respectively. Both are ranking among the worst regarding workers' rights (International Trade Union Confederation 2020). The two analysed agreements came into being in 2015. The GFA in question builds on many years of experience, as the GFA approach was already developed in other sectors in the 1980s and is now reasonably well established. Bangladesh was the first country where it was successfully implemented, and the one with the highest sourcing volume of the signing TNC outside of China. In contrast to the GFA, the design and institutional foundations of ACT are still under development.

We assess the challenges of its implementation in Cambodia, where this process came closest to completion.

Our argument draws on 29 semi-structured interviews with stakeholders in both countries and at the global level between March 2020 and June 2021, as well as on public and internal documents. The interviews covered involved trade unionists at different levels, supplier and lead firm representatives, and industry experts. The documents are the agreements themselves, internal procedural guidelines, press releases, website-texts, and similar communication material. The article proceeds by outlining the theoretical concepts employed. Subsequently, we present the two case studies. Finally, we comparatively conclude and outline how power dynamics shape both TIRAs and are in turn influenced by them.

## **2. Thinking workers' power in global production networks**

Whether and in which ways workers have agency and can influence the conditions of their own employment depends on power relations within as well as beyond places of production. These are fundamentally shaped by the architecture of the GPN(s) the workers are positioned in, the form of workers' organisation, and the policy and institutional environments (Henderson et al. 2002; Bair 2008; Rainnie et al. 2011). To operationalise the power of labour organisations, the PRA is a helpful heuristic model. It allows for understanding labour struggles at the intersection of structural analysis of capitalist production and for an investigation of workers' agency. In this way, the perspective has also proved useful for analysing capital-labour relations in the global South (Spooner/Mwanika 2018; Webster 2015).

The PRA differentiates between four interrelated power resources of workers and their collective organisations, which are key in the analysis of TIRAs. Structural power refers to the workers' capacity to interrupt the valorisation of capital. In GPNs, structural power is influenced by the mode of GPN operations (e.g. just in time production vs. warehousing), the workers' position in the process (e.g. low-skilled production vs logistics), and the nature of their employment (e.g. day labourer vs. fixed contract) (Coe 2015). Associational power of workers emerges if they collectively form organisations which act strategically, for instance by signing

agreements (Wright 2000). If structural power resources are mobilised and pooled by associational power in the form of strikes or other actions, social upgrading can happen (Marslev 2019; Selwyn 2013).

Institutional and coalitional power resources extend the original two power resources model (Schmalz et al. 2018). Institutional workers' power arises from legal guarantees such as the right to strike and institutions such as labour courts. Additionally, institutional power resources can emerge from formal and informal conventions and practices between employers and labour organisations, such as collective bargaining (Coe 2015: 186). Coalitional power resources can come about if trade unions engage with non-labour stakeholders, successfully utilising support of other civil society organisations or consumers for workers' demands. The different power resources are deeply interlinked and complement, substitute or contradict each other. While institutional arrangements often create agency spaces for workers, they can also restrict them by containing strikes and other workers' actions and by predefining paths of negotiation (Schmalz et al. 2018: 121).

While the PRA originated in global analyses of labour movements (Silver 2003), its subsequent conceptualisations by Schmalz et al. do not systematically account for the global dimension of the networks in which workers are positioned. To fill this gap, we extend the PRA with the concept of scales. Originating from geography, scales are used to describe geographically and politically constructed spaces of social relations, such as the factory, the national, the regional, and the global level (Herod et al. 2007; Lier 2007; McGrath-Champ 2005). Through globally operating TNCs and their GPNs, workers and their agency spaces are necessarily connected to various actors at different scales simultaneously (Cumbers et al. 2008).

As workers' power resources are shaped by their relation to other actors, especially to capital and the state, we look at these power relations in GPNs along two dimensions. On the one hand, the vertical dimension covers power relations across scales. Vertical power relations often refer to transnational relations between GPN actors, for example between a global lead firm and a trade union federation in a production country. They also include inter-firm governance between lead firms and suppliers, thoroughly conceptualised in GPN (as well as GCC and GVC) theory (Gereffi et al. 2005; Gibbon et al. 2008). On the other hand, there are horizontal power

relations within one scale. These are most elaborately discussed regarding the places where production takes place. While the need for control of labour is established through the vertical governance of GPNs, it materialises in horizontal, socially embedded relations between workers, direct employers, and the state (Coe/Jordhus-Lier 2011; Levy 2008).

Labour conflict, labour action and institutional answers increasingly expand across scales. By extending the battle from the factory to other scales and building transnational alliances with GUFs or advocacy organisations, less powerful labour organisations can increase their power towards capital (Brookes 2017). We refer to this strategy of “jumping scales” (Merk 2009: 599) as a ‘vertical escalation’ of the capital/labour conflict. Such vertical escalation to nodes more sensitive to disruption or negative publicity can be a source of leverage in contexts of low structural, associational, and institutional power at the factory and national scale. Workers’ power in GPNs depends on the workers’ capacity to facilitate and harness this vertical escalation and capital’s ability to prevent or at least shape such processes.

Global and local labour organisations are involved in utilising power resources emerging from GPNs and wider societal configurations as well as (co-)creating new power resources through strategic interventions and interactions at different scales (Zajak 2017b). In our research, we particularly analyse institutional power resources, understood as historic products of struggles at the factory, national and global scale. TIRAs such as GFAs and ACT are outcomes of power struggles and only as effective as the involved labour organisations are powerful (Gregoratti/Miller 2011: 98). At the same time, TIRAs can only count as effective if they are able to influence the power relations between workers, employers, buyers, and states (McCallum 2013: 19–47).

### **3. The double-edged nature of a single-firm Global Framework Agreement**

GFAs are documents negotiated and signed by GUFs such as IndustriALL, with TNCs mostly headquartered in Europe. They cover basic workers’ rights, such as the right to organise and apply to operations of the

TNC worldwide, often also to suppliers (Papadakis 2011). In contrast to enforceable ‘hard law’, GFAs are not legally binding, thus falling into the ‘soft law’ category (Mund/Priegnitz 2007). At least more recent ones have, however, included mechanisms for dealing with non-compliance. Hence, GFAs are mechanisms of global governance, co-created by workers’ organisations and TNCs (McCallum 2013; Niforou 2014).

The effects of GFAs have been debated. Scholars have particularly identified problems of local ownership at the production sites (Cumbers et al. 2008; Fichter/Stevis 2013) and of implementation in subcontracting arrangements (Gregoratti/Miller 2011; Williams et al. 2015). While GFAs clearly differ from other CSR commitments in their architecture, their social partnership approach might still primarily aim at reducing the risk of human rights activists campaigning and not trigger effective change for workers (Anner 2012; Fichter/McCallum 2015). However, GFAs have the advantage of putting a focus on enabling rights which can allow workers in the global South to stand up for their demands but are less secured by classical approaches of CSR (Egels-Zandén/Merk 2014; Hammer 2005).

In the garment sector, GFAs are relatively rare. This is common for buyer-driven GPNs, which are GPNs characterised by governance of lead firms not directly involved in production (Gereffi 1999). To date, there are six garment TNCs which have an active GFA with the sector GUF IndustriALL. The first GFA was signed with Inditex in 2007, followed by Mizuni in 2011, H&M in 2015 (an earlier version only covered its own staff), Tchibo in 2016, Asos in 2017, and Esprit in 2018 (European Commission 2021). One of these companies, subsequently referred to as ApparelCorp to protect interviewees, has a GFA with by far the most developed implementation mechanism (Bauer 2021).

ApparelCorp is an apparel retailer and operates slightly more than 5,000 stores in 74 countries. As is common in the garment industry, all production is sourced out to legally independent suppliers, with the lead firms focusing on design and marketing. Switching costs between a vast number of competing suppliers are very low, resulting in a highly asymmetrical power relation. In ApparelCorp’s GPN, 759 first tier suppliers and their subcontractors manufacture in 1,898 factories and employ around 1.6 million workers (ApparelCorp 2020). ApparelCorp’s collections with small volumes are still produced in Europe, mainly in Türkiye and Portugal. The

TNC offshores the production of goods with big volumes mostly to Asia and manages supplier relations through local offices.

ApparelCorp, the GUF IndustriALL representing their affiliated trade unions around the world, and the national trade union of the headquarters country signed the GFA in 2015. While IndustriALL had unsuccessfully attempted to sign a GFA with ApparelCorp for several years, the TNC eventually reached out to the GUF and signalled its strong interest in an agreement. Stakeholders of the agreement portray labour unrest at the scale of production and subsequent costly disruptions of the supply chain with short lead times as having motivated its formation.

In the GFA document, the buyer commits to ensuring the compliance of its suppliers with basic workers' rights, primarily referring to fundamental ILO conventions, and to promoting peaceful collaboration between employers and employees (ApparelCorp et al. 2015). While the GFA declares ApparelCorp's motivation to improve the situation of workers through conflict resolution support, the TNC makes no specific commitments regarding purchasing practices. The unique multi-scale implementation mechanism contains a conflict resolution procedure which allows workers and their organisations to report supplier misconduct to committees staffed by labour representatives and buyer personnel (ApparelCorp et al. 2018). Conflicts between supplier management and workers are intended to be discussed and solved at the factory scale. If no conclusion can be reached, they can be brought to so-called National Monitoring Committees (NMCs). These committees were established at the national scale and comprise 50% local ApparelCorp representatives and 50% representatives of trade unions affiliated with the GUF. At the global scale, a Joint Industrial Relations Development Committee (JIRDC) is set up as a final forum for conflict resolution.

The implementation mechanism has so far been established in Bangladesh, Cambodia, India, Indonesia, Myanmar, and Türkiye. Bangladesh was the first country where the GFA was implemented. Confronted by a strong anti-union environment (Rahim/Islam 2020) and pro-business policy (Bair et al. 2020), the trade union density in the garment sector of Bangladesh is only about 2%. The most common triggers of labour protest and wildcat strikes are withheld wages. Only few conflicts are brought to court, while jurisdiction takes years and often does not benefit the workers

involved (Moazzem 2017). Of 587 factories producing for ApparelCorp in Bangladesh in 2020, only 32 were unionised.

While the reach of the GFA implementation is still limited, the empirical analysis suggests that the GFA provides workers and their organisations in Bangladesh with meaningful access to institutional power. Conflicts such as union busting and withheld wages at supplier factories can be vertically escalated to the NMC, and from there to the global scale for resolution. By staffing 50% of these committees and being informed about employer misconduct, the lead firm can use its leverage on suppliers to enforce compliance with agreed standards. Trade union representatives characterise ApparelCorp as having a great influence on suppliers in Bangladesh due to high-volume orders and the reputational importance of business relationships with the lead firm.

The GFA mechanism is reminiscent of the boomerang model in social movement theory. In this model, activists target state policy through activating foreign actors to influence the state (Brookes 2017; Keck/Sikkink 1998). Similarly, trade union actors report an improved leverage vis-a-vis local suppliers by engaging with the geographically distant buyer under the GFA. By helping workers to challenge their employers, the mechanism works as an alternative to engaging with weak and employer-biased state institutions. Trade unions in Bangladesh report to prefer the GFA route in the fight for their rights to taking rights violations to labour courts, due to the low accessibility and probability of gains through national jurisdiction. Institutionalised resources providing workers power, such as GFAs, are particularly important for workers in an environment where associational power resources are low, as described above, and the mobilisation of structural power resources risky. Labour action has little legal protection and is often answered by violent actions of security forces.

However, the GFA with ApparelCorp has a two-sided effect. The instrument does not only enable the vertical escalation of labour conflicts towards the buyer; at the same time, it allows the buyer to govern the conflict escalation. Conflicts which previously reached consumer markets through transnational worker-civil society coalitions appear to be replaced by an institutionalised and collaborative approach between trade unions in production countries and TNCs. The GFA mechanism offers a path of vertical escalation which the agreement defines. It explicitly encourages keeping the conflicts as close as possible to where they occur. At the same

time, the joint resolution mechanism allows ApparelCorp to anticipate risks at formally independent suppliers. This shows that GFAs can not only provide added-value for TNCs by helping to monitor social compliance at subsidiaries (Bourguignon et al. 2019), but also at suppliers.

While the NMCs intervene in cases of labour rights violations, they do not engage in wage setting or collective bargaining. By leaving the wage setting to the parties at the factory scale, the GFA mechanism tries to assure “mature industrial relations” (Miller et al. 2010) between employers and employees. The hope is that “mutual understanding and bonding” (IndustriALL Global Union 2018) of the parties opens the way for improvements. However, the highly asymmetrical vertical power relations and very small margins in garment GPNs often do not enable suppliers to pay a living wage, as agreed in the GFA (Anner 2020b). Additionally, the horizontal power disparity between employers and workers in Bangladesh leaves little chances of substantial wage increases through collective bargaining at the factory scale.

The formation and functioning of the GFA shows that workers in the GPN have at least a certain power, and that this is an important driver for buyer engagement with labour rights violations at their suppliers. The implementation structure offers an institutionalised channel through which workers can react to violations, but the agreement simultaneously contains power struggles within the scale of production. Scholars and practitioners shared a vision of GFAs, and the one with ApparelCorp in particular, as providing a platform to negotiate wider employment conditions and purchasing practises with lead firms (Helfen/Fichter 2013; Kaltenborn et al. 2020). However, empirical data from five years of implementation in Bangladesh shows a different picture. While the mechanism is somewhat successful in enforcing legally secured claims and tackling illegal employer activities, the instrument does not provide a negotiation table for sector-wide challenges.

#### **4. The promising but contested multi-firm ACT agreement**

ACT is a multi-firm TIRA between IndustriALL and 20<sup>2</sup> garment lead firms, such as Inditex, H&M and Primark. Fifteen lead firms signed a Memorandum of Understanding with IndustriALL in August 2015. Over

the years, eight firms joined and three were sold to competitors, resulting in a current total of 20 signatory firms – most of them headquartered in Europe. The agreement’s aim is to create institutional platforms in producer countries, platforms on which trade unions and employers can negotiate sector-wide changes. This is supported by lead firms’ commitments to enable these changes, financially and structurally (Alexander et al. 2017; Aswhin et al. 2020).

The ACT office in Berlin represents both IndustriALL and the signatory lead firms and holds the executive role in implementing the two interlinked processes of sectoral bargaining and buyer commitments at two different scales. At the national scale in selected producer countries, the office works on establishing sectoral collective bargaining between national garment trade union federations and industry associations. At the global scale, the office coordinates and monitors the implementation of the lead firms’ commitments to transforming their purchasing practises in order to create conditions that support bargaining at the national scale.

Cambodia, a country with high unionisation rates and a vibrant history of workers’ action, was chosen as the first country for implementation. To date, it remains the one with the most in-depth negotiations among the implementation countries and is the one which has been most thoroughly examined (Cichon 2019). Promising developments in Myanmar, which led to a provisional sectoral agreement and Covid-19 commitments, were scotched by the military coup in March 2021. In Türkiye, sectoral negotiations have been hindered so far, due to the absence of a sector-wide industry association. Several introductory meetings were also conducted in Bangladesh, Vietnam, Ethiopia and in various Eastern European countries.

In the first years, the ACT office mainly worked on designing the process at the global scale, as the initial Memorandum of Understanding only laid out the foundation of the mechanism and still lacked crucial technical details. Central aspects of transforming the purchasing practices were identified through lead firms’ self-assessments and national stakeholder consultations. As a first result, six *Country-Specific Support Commitments* were announced in August 2018. These commitments aim at supporting countries in taking the first steps of establishing sectoral collective bargaining. They will be enforced by lead firms once a sectoral agree-

ment has been negotiated between suppliers and unions. Key elements are that lead firms make the country a preferred sourcing destination and incorporate higher wages in their calculation of purchasing prices.

In addition to these commitments at a national scale, ACT adopted five *Global Purchasing Practises Commitments* in November 2018. Signatory lead firms pledged to implement them throughout their GPNs by the end of 2023. Central here again is to include wage increases as an itemised cost in the purchasing price. Additionally, brands commit to timely payments as per purchasing contracts and to better planning and forecasting of orders.

If both processes are successfully enforced, the approach of ACT has the potential to fundamentally reshape vertical and horizontal power relations. The transformation of lead firms' purchasing practises could decrease the vertical power asymmetries between lead firms and suppliers. The establishment of sectoral bargaining would additionally create a source of institutional workers' power at the national scale vis-à-vis their employers. ACT is designed to vertically escalate sector-wide issues, such as the conflict regarding remuneration, from the factory to the national and ultimately global scale. This approach represents a major improvement compared to the escalation of individual rights violations in the conflict resolution processes of the GFA described above. However, the developments in Cambodia show that the implementation of ACT is confronted with serious challenges.

In September 2015, The ACT approach was introduced to Cambodian stakeholders for the first time. Unions reported that it took until 2017/18 for the meetings between the Garment Manufacturers Association of Cambodia (GMAC), trade unions, and the government to start. During a fourth ACT consultation in September 2018, IndustriALL reported on the progress of provisional negotiations between affiliated trade unions and the industry association. However, the optimistic hope to establish sectoral collective bargaining in Cambodia began to shatter at the beginning of 2019.

In February, the EU started a process to investigate the suspension of Cambodia's preferential access to the European market through the Everything-But-Arms (EBA) scheme, a suspension which occurred due to workers' rights violations, political repression, and a crackdown on inde-

pendent media. Cambodian unions called on the EU not to withdraw the trade benefit. In March, GMAC publicly withdrew from the ACT sectoral negotiations. They stated they would not be able to enter sectoral negotiations leading to higher wages if the signatory lead firms represented only 30-40 per cent of the buyers sourcing from Cambodia. Sectoral negotiations would result in the majority of suppliers having to pay higher wages while not benefiting from transformed purchasing practises. Additionally, ACT was not at this time able to address regional competition. The Country-Support Commitments did not prove attractive enough. GMAC stressed the comparatively high minimum wage in Cambodia's garment sector of 190 USD per month. Competitors in Bangladesh, for example, must pay only around 100 USD.

In April 2020, Cambodian unions called on several lead firms (GAP, Puma, Nike, Adidas, Uniqlo, Levi's and VF) to join the ACT agreement, blaming GMAC's decision to withdraw on their inaction. However, none of these lead firms have joined ACT. Companies headquartered in the US in particular, except for PVH, refuse to join. The Covid-19 pandemic and subsequent order cancellations by some ACT signatories created further distrust among suppliers. In May 2020, Cambodia partially lost its EBA status, which further increased the cost of garments exported to the EU.

While the two sets of lead firm commitments do not hold any legal status, the ACT office is working on an enforcement mechanism. In September 2019, it adopted a *Monitoring and Accountability Framework*. The implementation of lead firm commitments will be monitored by their existing self-assessment, the anonymous assessment of suppliers, and information collected through a complaint and dispute settlement mechanism which is yet to be created. So far, little is known about the actual transformation of lead firms' purchasing practices and the consequences of non-compliance. Cambodian stakeholders express concern about the lack of an obligation for lead firms to pay higher prices to suppliers. General distrust in the mechanism is also rooted in fact that the amount of the price increases remains unclear to Cambodian stakeholders. In consequence, the Cambodian government hindered the ACT process by refusing to create the legal conditions to enable sectoral bargaining.

As a result of the above factors, the implementation of sectoral collective bargaining in Cambodia has stalled. Overall, unions welcomed their

inclusion in the implementation process and the possibility to negotiate with employers at a sectoral level. While they have not gained access to relevant power resources so far, representatives stress that lead firms have already benefited, as they were able to improve their image. Convincing GMAC to join sectoral negotiations was the key point in implementing ACT in Cambodia; Cambodian unions played a secondary role. The ACT office, involved lead firms and IndustriALL tried to win over suppliers by promoting the 'win-win situation' between suppliers and workers, emphasising that collective bargaining 'takes conflict out of the workplace'. While trade unions were eager to join sectoral bargaining, the sectoral supplier association GMAC was reluctant to do so.

At the time of writing, the ACT office is exploring a new approach of implementing the ACT idea by bypassing GMAC. The office is negotiating with individual suppliers of ACT lead firms to join a multi-employer agreement. This avenue could be more successful, as all joining suppliers would directly profit from transformed purchasing practices. The sectoral dimension of collective bargaining, however, is lost in this approach.

Throughout the ACT implementation process, no major activation of structural, associational, or coalitional power resources took place to encourage lead firms and employers to get ACT off the ground. This is surprising given that Cambodian trade unions have been very successful in pressuring capital and the state into concessions through a combination of strikes and protests (Marslev 2019). In contrast to the call for immediate change made by labour NGOs, ACT's long-term approach made the agreement attractive for lead firms (Ashwin et al. 2020). However, the long-term approach could also obscure lead firms' immediate responsibility to enable the payment of living wages. This becomes particularly problematic if ACT fails to establish institutional power and the mobilisation of other power resources remains in the background.

## **5. Conclusion**

We analysed two TIRAs in different states of implementation on their design and effectiveness. The overall effect of the GFA with ApparelCorp is double-edged, enabling and limiting agency spaces of labour organisations

at the same time. Introducing institutional power allows unions at the scale of production to vertically escalate their concerns. The mechanism of the agreement has helped workers in Bangladesh pressure employers into complying with basic labour standards in a more effective way than was the case with state institutions. On the other hand, the focus of the GFA on avoiding the activation of coalitional power across scales and the governed vertical escalation of conflicts contains the struggle at the factory scale. This stabilises lead firm governance of the GPN. The GFA turned out not to serve as a tool for addressing sector-wide issues such as low wages. GFAs assign wage setting and collective bargaining to the factory scale, where small margins due to low prices paid by buyers, massive competition and horizontal power asymmetries render substantive wage increases unlikely.

ACT, in contrast, is designed to vertically escalate these sector-wide issues, especially the conflict regarding remuneration, from the factory to the national and ultimately global scale. The establishment of collective bargaining between trade unions and capital at the national scale is supported by the transformation of purchasing practises, orchestrated by a GUF and a group of lead firms at the global scale. ACT thereby addresses central weaknesses of the GFA approach by targeting issues deeply engraved in the GPN architecture. If the implementation of ACT succeeds, this instrument can reshape horizontal and vertical power relations in the garment industry. It can create institutional power of trade unions vis-à-vis their employers at the national scale and diminish the power disparity between lead firms and suppliers. However, existing vertical and horizontal power asymmetries have hindered the successful implementation of ACT since its formation. The agreement was unsuccessful in its critical goal of making suppliers join sectoral bargaining because of limited lead firm participation and a distrust regarding the mechanism among Cambodian stakeholders. ACT could even be detrimental to workers if the initiative remains unsuccessful in establishing institutional power over a long period and the mobilisation of other power resources continues to be treated as secondary in the meantime.

Both TIRAs have the potential to increase the institutional power resources of workers and their collective organisations in garment GPNs by connecting actors across scales. With the help of lead firms, they provide institutionalised platforms through which labour representatives can

address problematic employment and working conditions. The empirical research on the GFA in Bangladesh shows that such institutional power through the multi-scalar resolution process is appreciated by labour activists in the context of less effective state institutions. Similar perspectives were found in Cambodia, where trade unionists appreciate the idea of ACT and its potential to establish collective bargaining at the national scale. However, it has become clear that workers have gained little institutional power through ACT so far.

Overall, institutional power resources established through global mechanisms backed by lead firms need to be taken with caution. First, it should not be forgotten that the problems the initiatives try to solve are co-created by the lead firms' purchasing practises in the first place. This makes their role in the agreements contradictory, motivating the majority to stay away from TIRAs. Second, institutional power is usually the outcome of mobilising structural, associational, and coalitional power in labour action, which pressures capital into making concessions. Relying on institutionalised governance, a mobilisation of these power resources is at its best secondary in both TIRAs. Third, the analysed institutional arrangements can even support lead firms in managing and containing the mobilisation of other power resources.

Both TIRAs aim to provide ways for labour actors to cope with challenging political-economic contexts. By working on transnational institutional power, they try to compensate for a weak institutional environment as well as limited structural and associational power resources at the factory and the national scale. Whether this institutional approach can substantially and sustainably change the asymmetric power relations between capital and labour without a greater link to the mobilisation of structural, associational, and coalitional power resources is yet to be seen.

- 1 We use the term Global Production Network (GPN) as it has the advantage over Global Commodity Chain (GCC) and Global Value Chain (GVC) of being more open towards non-firm actors and institutions (Bair 2008).
- 2 The 15 founding lead firms include Arcadia Group (UK), Asos (UK), C&A (Germany), Debenhams (UK), Esprit (Germany), H&M (Sweden), Inditex (Spain), N Brown (UK), New Look (UK), Next (UK), Pentland Group (UK), Primark (UK), Tchibo (Germany), Tesco (UK), Topshop (UK); The eight subsequent signatory lead firms include Kmart (Australia), Bestseller (Denmark), Cotton On

(Australia), PVH (US), zLabels (Germany), G-Star (Netherlands), Lidl (Germany), Big W (Australia); three UK firms were sold to competitors, leading to 20 signatories in total.

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**ABSTRACT** *In diesem Artikel werden die Auswirkungen von zwei transnationalen Vereinbarungen über Arbeitsbeziehungen (TIRA) in der Bekleidungsindustrie auf Arbeitnehmer\*innenmacht untersucht. Ein konzernbezogenes globales Rahmenabkommen (GFA) wird der Initiative „Action, Collaboration, Transformation“ (ACT) gegenübergestellt, die mehr als ein Leitunternehmen umfasst und umfangreichere Verpflichtungen vorsieht. Unter Anwendung einer Macht-Ressourcen-Perspektive wird untersucht, wie vertikale und horizontale Machtbeziehungen die Umsetzung der beiden Abkommen prägen und wie die Abkommen ihrerseits diese Machtbeziehungen beeinflussen. Die Untersuchung konzentriert sich auf die Umsetzung des GFA und der ACT Initiative in Bangladesch bzw. Kambodscha und stützt sich auf die Analyse von Dokumenten und Interviews mit den wichtigsten Akteur\*innen. Wir kommen zu dem Schluss, dass das GFA es den Arbeitnehmer\*innen ermöglicht, Druck auf die Arbeitgeber auszuüben, grundlegende Arbeitsnormen einzuhalten, aber auch den führenden Unternehmen hilft, Arbeitskämpfe besser einzudämmen und ihre Lieferkette zu überwachen. Die ACT-Initiative gibt Gewerkschaften die Möglichkeit, strukturelle Probleme zu verhandeln, und stärkt somit die Macht der Arbeitnehmer\*innen in größerem Umfang. Allerdings ist ACT bisher nicht erfolgreich umgesetzt worden. Obwohl beide institutionellen Ansätze das Potenzial haben, die asymmetrischen Machtverhältnisse in der Bekleidungsindustrie zu beeinflussen, haben sie diese bisher nicht wesentlich verändert.*

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