Transnational Labour Organizing Instead of Global Competition – Limits and Possibilities

Findings from a special issue of the Austrian Journal of Development Studies (JEP) "Jumping scale, bridging space? Transnational labour organizing in global production networks"

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Introduction

Research on global value chains (GVCs) and production networks (GPNs)[1] has developed a rich analytical framework for studying globalized production and the international division of labor. It reveals important insights into the spatial expansion of production and firm strategies. Interestingly, labor relations and workers' agency remained a black box for quite a long time. Particularly "first generation" GVC research, which proliferated in the late 1990s, was above all concerned with inter-firm relations, the resulting modes of governance, and the possibilities for industrial or economic upgrading. "Upgrading" was seen as a viable strategy to development: supplier firms and producers in the global South should strive to shift to higher value activities, thus strengthening their bargaining capacity vis-à-vis lead firms, often transnational corporations (TNCs) from the global North, and, in the end, increasing their share of the total surplus.

The focus on upgrading can be explained by the fact that many researchers in the field came from or had close links to development studies. It is nevertheless somehow astonishing that labor issues remained at the margins since GVCs not only impact on economic development prospects, but also on working conditions, wages, and on workers' power and struggles. Labor was mainly treated like a commodity input into production or a cost factor with regard to decisions made on sourcing and location (Thompson et al. 2015: 53; Selwyn 2016: 53; see also Selwyn 2019). This has changed however over time and, since the 2000s, GVC and GPN scholars have opened up to labor issues. At the same time, researchers predominantly concerned with labor have approached the GVC/GPN field and transnationalised their agenda.

Critical commodity chain and network studies have their merits in studying globalized production and how powerful actors, in particular lead firms, are enabled to increase their profits. Labor studies, on the other hand, focus on working conditions and labor relations, exploitation and resistance in specific contexts. While the former often neglected labor relations and workers' power, the latter usually leave out the hierarchical connection of labor regimes at different locations and the maintenance of income differentials between the "high" and the "low ends" of a commodity chain, situated in different parts of the world. Engaging in a dialogue is therefore a highly productive endeavor.

This article and the broader special issue assess how transnational organizing is embedded within and structured by GVCs/GPNs and their specific sector dynamics and power relations. It visits concrete places and discusses broader political-economic and social contexts, thereby contributing to ongoing theoretical and methodological debates as well as enriching the empirical evidence on cross-border labour organizing. In doing so, its contributions go beyond trade unions (as important as they are),

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[1] Behind these acronyms are different strands of research that have been discussed, for example, in Bair (2005), Hess (2009) and Fischer et al. (2021).

looking at how different union, other labour and non-labour actors and organizations work together in often much less institutionalized ways. The contributions ask how forms of (transnational) labour organizing have evolved and changed in the context of GVCs/GPNs and what are their successes, challenges and prospects in changing power relations in and beyond GPNs.

This introductory article gives, firstly, an overview of key developments in the GVC and GPN approach with regard to labour as well as how a GVC/GPN perspective has been used in labour studies. Secondly, it discusses labour as a transnational actor, conceptualizing different approaches and actors of transnational organising initiatives and struggles. Thirdly, it provides empirical insights on the complexity of scales related to such (transnational) labour organising, deriving from the GVC/GPN and labour studies literature. The last section concludes.

GVC/GPN research and the labor question: critique and developments in the field

GVC analysis is a moving research field. Scholars from different disciplines and theoretical backgrounds have contributed to a lively debate and pushed the research community forward (Fischer 2021). This is clearly shown in the discussion about upgrading. After a first phase dominated by policy orientated studies, a large number of studies started to dismantle the "optimistic upgrading narrative" (Thompson et al 2015: 54). Many empirical studies have shown that economic upgrading is not an automatic outcome of participation in GVCs; rather it is a contested process and one where firms can remain stuck in or even downgrade to low-value positions including by choice (Bair/Werner 2011). Moreover, even if economic upgrading is successful, it does not necessarily bring with it the assumed benefits such as more security or higher profits. This is because in a context of high competition, supplier firms may upgrade just to keep pace with competitors and avoid being replaced in GVCs (Kaplinsky 2005).

The contested gains of economic upgrading are also not spread evenly. The implicit assumption was that economic upgrading benefits workers through better wages and working conditions. Yet early research focusing on labour pointed to mixed outcomes of integration into and economic upgrading in GVCs, showing that rewards were not passed on to workers in the form of higher wages, greater job security and/or improved working conditions. For instance, studies found that participation in apparel GVCs had different impacts for different sections of workforces (Nadvi and Thoburn 2004) and that commercial pressures of horticulture GVCs were passed onto workers, leading to job informalization, low wages and excessive working hours (Barrientos and Kritzinger 2004). With regard to commodity food chains, more often than not smallholders and contract farmers became increasingly dependent upon inputs, proprietary seeds, and the regulation of production by agribusiness. Finally, they lost control over processing and marketing. (Anner 2015; Fischer 2020; Fischer et al. 2021; Amanour 2019; Gibbon/Ponte 2005)

Following from this insight, researchers defined social upgrading as a distinct process. Social upgrading was defined as the 'improvement in the rights and entitlements of workers as social actors, which enhances the quality of their employment' (Barrientos et al. 2011: 324). Framed by the ILO Decent Work Agenda, it is anchored in the four pillars of the ILO Declaration on the Fundamental Principles and Rights at Work (1998): decent employment and income, standards and rights at work, social protection, and social dialogue. Evidence for social upgrading is widely classified in two dimensions: measurable standards, which refer to tangible aspects such as wage levels, contractual terms and working hours; and enabling rights, which refer to freedom of association and collective bargaining, non-discrimination, voice and empowerment (Barrientos et al. 2011).

Extensive literature emerged studying if, how, and in what form workers or contract farmers could increase their benefits and improve their working conditions during economic upgrading processes. (Barrientos et al. 2011) Key findings from this literature are that social and economic upgrading were not widespread, and that economic upgrading is a necessary but insufficient condition for social upgrading (see e.g. articles in relation to the Capturing the Gains research project[2]; Pickles et al. 2015 and Barrientos et al. 2016). There is also evidence of social 'downgrading', which is more widespread when one considers the uneven outcomes of economic upgrading on different aspects of working conditions and for different groups of workers. Work can be improved in many ways, for example, in terms of qualification, social security, working hours, income, gender equality, or freedom of association. These dimensions can change independently from each other. (Selwyn 2013; Bair/Werner 2011; Rossi et al. 2014) If firms take on further and/or higher value activities within GVCs, a core of workers might profit. In other areas of the production, or at other locations, there might emerge a new demand for flexible – and therefore unsecured and underpaid – workers.

For example, Anner (2020) highlighted that while economic upgrading may be associated with wage increases, it can simultaneously entail higher work intensity or a backslash on freedom of association. Studies further showed that economic upgrading may increase the skill content and improve working conditions for some workers but lead to social downgrading for others due to cost-cutting, quality, and flexibility pressures. Social up- and downgrading often differs by workforce segmentation (permanent vs. temporary, direct vs. subcontracted, etc.) and worker identities such as gender, migration or race (Rossi 2013; Plank et al. 2014). Such findings are also valid for agrarian value chains. More 'entrepreneurial' farmers might profit from integration into agrarian value chains. Although dependent on international markets and durable ties with the lead firm, they might be able to raise their profits – at the expense of (part-time, casual or informal) rural wage laborers they hire on poor and ever worsening employment conditions.

To capture how GVC participation may deepen rather than alleviate vulnerability for workers, Philips (2011), contributing to GPN research, incorporated the notion of 'adverse incorporation'. The concept denotes a vicious circularity where initial conditions of poverty make workers vulnerable to precarious employment in GVCs, which – largely due to the commercial dynamics of chains– reinforce these circumstances. Rather than an aberration, adverse incorporation is integral to the 'normal functioning' of GVCs, contravening the idea that economic upgrading will improve the socioeconomic situation of workers. From a different yet related angle, Bair and Werner (2011) address the 'inclusionary bias' of GVC and related research through a 'disarticulations perspective' that sees the incorporation into, and expulsion from, commodity circuits as connected processes of uneven capitalist development. Through this lens, the devaluation and exclusion of some workers (and firms and regions) are constitutive of the formation and restructuring of GVCs.

A related critique of research on social upgrading focuses on its neglect of interest conflicts and power asymmetries that permeate GVCs. Most forthcoming has been Selwyn (2013) who critiqued the social upgrading framework as an "elite comprehension of relations between capital, the state and labour". It denies, and this applies also to the Decent Work Agenda of the ILO, labour's exploitation by capital. In this view, lead firms` sourcing practices are based on existing class differentiations – on a national and transnational scale. (Selwyn 2016) Concretely, he criticizes the concept on three grounds: its assumption that lead firms, states, trade unions and international organizations coalesce around common interests in combating indecent work; its failure to see that the social relations of capitalist

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[2] www.capturingthegains.org

production render such cross-class alliances unviable; and its misspecification of the causes of indecent work and, consequently, unrealistic and ineffective policy proposals. As part of a wider turn to 'labour-led development', Selwyn (2016) argued for understanding labour exploitation and class conflict in GVCs from a bottom-up approach. From this perspective, it is clear that social upgrading and downgrading processes cannot be accurately captured without taking power relations between the actors involved into account (Selwyn 2016: 1781; Marslev et al. 2021).

It seems fair to say that the GVC camp needed some time to approach the labor issue. The GPN approach, however, was more open to labor issues from the very beginning. GPN researchers, predominantly economic geographers, do attempt to include a range of the relevant – non-corporate – actors and relationships involved in global production, such as national states, regions, supra-national institutions, business associations and trade unions (Coe et al. 2008) Even though the chain metaphor should not be equated with an essentially linear structure or solely vertical processes, the network perspective illuminates the wider social conditions in which production, reproduction, and consumption is embedded. The focus is therefore on broader economic, social and political arrangements and on how these structures affect agents at the various sites of GPNs. As Rainnie, Herod, and McGrath-Champ argue, the GPN approach has an advantage as it "restores the territoriality of institutional and regulatory contexts and the state as an actor," enabling the researcher to consider how production networks "are constituted and reconstituted by the economic, social and political arrangements they inhabit" (Rainnie et al. 2011: 159). Thus, in the context of GPNs, workers' power is as much about actors' political and institutional ties as it is about their economic location (Coe/Jordhus-Lier 2010: 222) Although the GPN framework acknowledged the importance of integrating labor in the picture, studies rather tended to treat labor as the passive victim of restructuring, thus reproducing the factor of production approach (Taylor et al. 2015: 2; see also Herod 1997; Cumbers et al. 2008; Rainnie et al. 2011)

Labor geographers within the field have criticized the focus on workers as objects without deeper conceptualization of their agency for some time, making a plea to place labor agency at the center of GPN dynamics (Cumbers et al. 2008; Rainnie et al. 2011; Carswell and De Neve 2013; Coe and Jordhus-Lier 2011). It was labor geography in particular that criticized GVC approaches as capital- and state-centric and introduced GPNs as "networks of embodied labor." The central tenet of labor geography "is the claim that the geography of capitalism makes a difference to workers and that workers make a difference to the geography of capitalism." A central motive is to show that workers are not powerless and condemned to follow the dictates of global capital. Instead, they actively create and shape geographies, even when exposed to high vulnerability and insecurity. Significant here is labor and its "geographical condition": actions of labor play out in complex social geographies and, at the same time, can be seen as spatial phenomena themselves. Therefore, labor geography is interested in workers' economic and political practices.

Making the social reproduction of labor visible is what gender/feminist theorists contribute to the GVC/GPN research agenda. Feminist scholars inform our understanding of how chains or networks are embedded in and exploit gender and other social relations and hierarchies (e.g. race, sexuality, age, nationality, ethnicity, place, community). They point to the place-specific, but transnationally interconnected dynamics of gender, race, and class, and how they interact with global inter-firm relations in GVCs (Bair 2010). Strategies of firms often build on prevailing social hierarchies, as social differences are mobilized to ensure labour control. For instance, supplier firms adjust to cost, quality and flexibility pressures from lead firms by creating fine-grained stratifications among their workforces linked to differences in terms of gender, ethnicity, migrant status or types of working contracts, which

is the basis for differential schemes of remuneration and working conditions (Werner 2015; Plank et al. 2014). Such workforce segmentation, within firms and whole sectors, also serves to fragment labour and poses obstacles to working class solidarity (Coe/ Jordhus-Lier 2011). Further, female workers are frequently subjected to patriarchal managerial styles by male supervisors (Mezzadri 2020) or migrant workers are kept under surveillance in employer-controlled dormitories (Pun 2005).

Studies on female workers in global production have been particularly widespread, making us aware of gender hierarchies and discrimination. Markets, and GVCs, are 'gendered institutions' that buttress widely held perceptions of typical 'men's work' and 'women's work' (Elson 1999). The majority of the workforce in export production zones in the global South are young, semi-proletarized women. They are attributed worldwide with the same gender stereotypes ("nimble fingers") and more affected by precarious and informal working conditions, violence and lay-offs during economic crisis then men[3] (Bair 2010; Barrientos 2019; Elson/Pearson 1981). In apparel factories, for example, gendered divisions of labour are framed around social stereotypes of sewing as a 'low-skilled' female job and ironing as requiring the 'strength' of men. To capture the ways, in which production in GVCs is structurally linked to household and community spaces of social reproduction, Kelly (2009) proposed the notion of 'global reproduction networks'. Within households, women in the global South (but not only) are often subordinated to patriarchal norms, assigning them a disproportionate share of family obligations and unpaid household work; and these gender roles form the basis of patriarchal forms of labour control in production, which may include gender-based violence, and allow for lower wages, additionally subsidized by reproductive and informal work of women (Dunaway 2014a; Baglioni 2018; Mezzadri 2020; Barrientos 2019).

In feminist and world-systems inspired theorizing, GVCs rely on the i) intermingling of several forms of waged and nonwaged, free and unfree labor; ii) extraction of visible and hidden surpluses from households; iii) gendered and racial exploitation of workers; and iv) the economic devaluation of household-based work, especially that of women (Dunaway 2014a: 2) This definition addresses the power relations and inequality in chains or networks defined as a *social relation* of *exploitation.* Feminist perspectives therefore criticize a 'productivist bias', arguing for the importance and complex entanglements of the reproduction sphere and social differentiation related to gender and other categories to understand capitalist production (see e.g. from a Marxist perspective Bannerji 2011; Bhattacharya 2017; Mezzadri et al. 2021).

Critique pushed GVC/GPN analysis forward – and sometimes it called upon the researchers in the field to look back to the intellectual foundation of commodity chain studies, namely to the world-systems approach (Bair 2005; Bair/Werner 2015; see also Selwyn 2012a) For World-systems theorists, although they never thoroughly investigated labor and labor agency, labor was of course a constituent element. Wallerstein and Hopkins defined a commodity chain as "a network of labor and production" (Hopkins/Wallerstein 1986: 159). For Christopher Chase-Dunn the "tree-like sequence of production processes and exchanges" included "raw materials, labor, the sustenance of labor, intermediate processing, final processing, transport, and final consumption" (Chase-Dunn 1989: 346). Instead of seeing economic upgrading as the main strategy for development, world-systems theorists advocated to increase the value of labor at every single "node of the chain," whether by bargaining or militancy. This strand of research also raises awareness of the role of households and unpaid or underpaid, commonly invisible, work of women for the functioning of commodity chains. Outsourcing work for commodity chains into the family household allows appropriating unpaid subsistence work and low-

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[3] For an overview on the gender dimension in the commodity chain literature, see Sproll (2020).

paid non-waged labor, transferring values to those who were in command of the chain. It is, according to Wilma Dunaway, the household and gender which ensures the maximal exploitation of underpaid and unpaid labor within every single node as well as between the nodes in the commodity chain (Dunaway 2001: 10, see also Dunaway 2014b: 60-63)

One should also not forget about global labor history which made some inroads into GVC/GPN research. One of the most distinguished scholars in the field, Marcel van der Linden, coined the term "subaltern workers". The term clarifies that labor power is commodified in many different ways. Formal and informal, regular and irregular is by no means a binary opposition but rather a process with many gradations and dimensions. The distinction between these different forms is fluid. They can be understood only by their relationship to each other and, importantly, in a transnational (chain) perspective (van der Linden 2008: 32). This insight directly corresponds with subcontracting practices of (lead) firms and prompts GVC/GPN researchers to pay more attention to the multi-faceted hidden and informal forms of labor along the chain. "Subcontracting". which GVC/GPN addresses as a firm strategy in order to save costs, must be connected with labor research. It is important to recognize that informal labor in chains or networks can be wage labor (regular or casual). "Hidden" wage labor includes self-employed workers, sharecropping peasant families or home industries, among others. Informal work is intentionally and systematically integrated into the presumably formal production network of global manufacturing chains, even in capital intensive sectors like the automotive industry (Sittel et al. 2015). In this sense, GVC/GPN research profited from global labor history but in turn provides an indispensable benefit to labour history: only a chain or network perspective uncovers the uneven and unequal combination of different modes of transnationally organized labor exploitation that makes cross-border production profitable (Selwyn 2013, Bair/Werner 2015).

Last but not least, sociologists of work and employment with a Marxist background criticized the "labor blindness" of GVC/GPN research and entered the field through labor process theory (LPT) (Newsome et al. 2015). LPT is above all concerned with forces of control, consent and resistance at the point of production, i.e. within firms, in the factory, at the workplace (Thompson/Smith 2009: 915). The prism of labor control brings labor exploitation and disciplining to the foreground and provides a deeper understanding of the constitutive role of labor and the position of workers within chains or networks. From early on, leading scholars "maximized" the value of LPT by extending the focus on the power relations between managers and workers to the whole circuit of capital and wider processes of the reproduction of class relations (Kelly 1985). Henry Bernstein, for example claimed that labor regime analysis is necessarily multi-scalar, taking the global, continental, national, regional and local dimensions of such regimes into account (Bernstein, cited in Selwyn 2013: 1773).

Academic inspiration also goes in the other direction. Researchers in the LPT camp turned to the concepts of GVC/GPN in order to transcend the narrow focus on workplace relations and local agencies (situated in the global North). While sociologists of work highlight asymmetries in labor relations, the multi-scalar GVC/GPN framework brings in the broader social-institutional context and the spatial interconnectedness of the seemingly separate work models within the hierarchical structure of global production. In this way, the labor process in particular places is integrated as a constitutive network element. Local labor control practices at the places of production such as, for example, labor-saving mechanization, informality, subcontracting, or gender segmentation can be analyzed with broader dynamics of labor control. By tracing the changing social arrangements of trans-regional production at different sites and locations, GVC/GPN research sheds light on the combination of different types of labor and labor regimes – an insight that would be hidden from a purely national perspective. Situating seemingly separate local labor regimes within chains or networks exposes the hierarchical structure

among the combined locations and within the capitalist world-system more broadly. It becomes clear how lead firms channel labor control pressures "through the chain." Strategies of managerial control do not end at the factory gate. Social disciplining can even be traced "down" to households, as feminist studies at the intersection of LPT and GVC/GPN framework show (Baglioni 2018).

Marxist sociologists of work also inspired GVC/GPN research with its focus on power resources of workers and their organizations, i.e. trade unions. The Power Resources Approach (PRA) was originally developed by Erik Olin Wright and Beverly Silver (Wright 2000; Silver 2003). They focused on two analytical concepts: structural power as the power stemming from labor's position in the economic system and the capacity it provides for disrupting capital accumulation, and associational power arising from collective political or trade union workers' associations. In a lively debate among scholars and trade unionists in the global North and South, the basic concepts were extended by additional 'power resources' that workers and their organizations can mobilize to further their interests (Schmalz et al. 2018 and the contributions in the respective issue of the Global Labour Journal 2018, 9(2), see also Selwyn 2019; Selwyn 2016; Agrawala 2013; Brookes 2017). The Jena approach (Schmalz et al. 2018) distinguishes four power sources – associational, structural, institutional and societal power, the latter sub-divided into coalitional and discursive forms, while Brookes (2019) differentiates three: structural, institutional and coalitional. Others have proposed further concepts such as symbolic power (Chun 2009), logistical power (Webster et al. 2008) and networked power (Zajak et al. 2017).

This newly awakened scholarly research interest was a reaction to the emergence of new trade union movements, innovative organizing strategies, and new forms of participation and campaigning. This could be observed especially in the global South, for example in South Africa, Brazil, South Korea, and the emerging economies or semi-peripheries in South (East) Asia. Workers militancy had a great deal to do with the growing industrial sectors in these countries due to offshoring and the relocation of GVCs. New forms of participation and campaigning refers to transnational alliances, with labor and non-labor organisations and activists. The discussions circle around the question of how workers and their allies can mobilize and leverage power against employers at different "nodes" in a GVC or play it out on multiple scales simultaneously.

Labor as a transnational actor: union-based governance struggles and networks of labor activism

Clearly, GVCs are a double-edged sword when it comes to transnational organizing. On the one hand, GVCs introduce new vulnerabilities to supplier firms and workers, playing out firms and workers on a global scale. These (re-)locational strategies of lead firms overrode workers` solidarity. Workers in one country could see workers in other countries as their competitor or even enemy, rather than uniting to challenge capital (Webster et al. 2008). On the other hand, GVCs link firm and workers up to consumers, exposing them to international initiatives and campaigns. Global norms of workplace rights – such as the ILO core labor standards, guidelines for multinationals or corporate due diligence acts – create opportunities for pressure to be exerted on lead firms breaching these rights.

Relocation is not only driven by cost and profitability. It is also a corporate strategy to escape unionized workers and to disrupt workers' capacity to organize and defend their interests. The combined processes of offshoring and outsourcing have "strongly undermined traditional strategies of labor to protect itself against exploitation, turning the global supply chain into a barrier both for organizing and

collective bargaining" (Merk 2009: 605-606). While lead firms can pit workers in different localities and different geographical jurisdictions against one another, labor is to a much greater extent locked into a particular place (Merk 2009: 603). At the same time, control can never be absolute. In her study on transnational relocation strategies of industrial capital, Beverly Silver arrives at the conclusion that the interrelationship between capital relocation and labor movements is far more complex than a race-to-the-bottom in labor standards. She put it in the famous sentence: "where capital goes, conflict goes" (Silver 2003: 41). At this point, new global labor studies come in, portraying workers not (only) as victims, but as having agency and the ability to actively shape the structures of chains or networks.

"Jumping scale and bridging space" is a concept developed by labor geography (Merk 2009). It is not only the lead firms' "weapon" to divide and weaken labor – also workers and their allies attempt "to meet capital at its own scale" (Brookes/McCallum 2017: 201). They scale up their activities geographically to shift the power-balance in the workplace. They bridge space to expand the terrain of struggle outside the factory, the export processing zone, the region and the country, and seek to mobilize support on various scales (Merk 2009: 606). Hence, transnational labor activism offers a broad spectrum for research. There are no criteria for categorizing the wide range of empirically observed types of transnational labor agency and the many different actors involved, so we roughly delineate three broad stream.

A first research stream that is not directly related to labour activism, but still important, is labor-oriented corporate social responsibility (CSR) by lead firms, particularly their corporate codes of conduct to regulate labor standards in supplier factories in the global South. These codes consist of a list of labor standards concerning child labor, health and safety, forced labor, and other issue that the lead firms commit to promote in their chains. The codes typically contain monitoring or 'social audit' mechanisms to measure the factories' compliance with the labor standards. Credibility of the code monitors, often in-house monitors or global auditing firms, and the frequency of monitoring turn out to be a large problem. Monitoring is not a single event; it has to be done continuously - especially when the public's spotlight is not on the company. Third-party monitors often lack resources given the high incidence of short-term contracts and high supplier turnover. Increased monitoring has led to some improvements with regard to outcome standards such as health and safety, and hours of work. Little progress, however, has been made with regard to social and political rights associated with freedom of association and collective bargaining. Zajek (2017) shows for instance that also multi-stakeholder CSR initiatives such as the Fair Labor Association which try to provide channels for workers' participation have largely failed to enable workers to communicate their concerns. It is however exactly these enabling right that would empower workers significantly – at the level of the workplace, an industry and the economy as a whole. Many case studies give impressive insights in these and other problems (Merk 2009; Wells 2009).

Research in this stream deals predominantly with the structural limits of private regulation in the form of CSR mechanisms. CSR is often characterized as a top-down instrument and a routine management function between suppliers and lead firms, without involving workers and their organizations. Some even classify private governance regulations of this type as "abject failures" (McCallum 2015: 149; see also Lund-Thompson/Lindgren 2014; Wells 2009; Merk 2009: 604-605). CSR can be a hegemonic practice of transnational buyers and not more than a mere marketing tool for corporate "green-washing". In this case, CSR is a pro-active private governance tool, not only to control and shape the conditions in a GVC but to control the broader environment in the main consumer markets and the local settings in which the lead firm operates (Ollendorf 2021).

The second stream of research, and the first one that directly focuses on labour, places global union efforts and bargaining campaigns at the head of collective labor agency. Accordingly, the focus is on the global structures of the trade union movement and the "governance struggles" (McCallum 2015) that are directed at modifying employment regulations at a transnational level. Most prominent governance tools are global framework agreements (GFAs) (see for example Brookes 2015: 201; Brookes/McCallum 2017. On Global Framework Agreements see Helfen/Fichter 2013). As a rather new tool to improve workers' rights in GVCs (the first one was signed 1988[4]), GFAs have the advantage of including workers and trade unions and putting a focus on enabling or process rights which are known to be less secured by classic approaches of CSR (Egels-Zanden/Merk 2014). After an early hype, many studies show however limited outcomes of GFAs on the ground, stressing the lack of local ownership and inclusion of trade unions at the production sites (Cumbers et al. 2008; Helfen/Fichter 2013; Fichter/Stevis 2013; Bauer 2021). McCallum (2013) identified five reasons for the limited success of GFAs, namely a shortage of resources at global union federations (GUFs), the absence of local unions, lack of lead firms' influence on suppliers, an absence of communication between national trade unions and insufficient incorporation of local unions.

In an explicit GVC context and analyzing the banana and cut flower GVCs, Riisgaard and Hammer (2011) conclude that leverage points of labour through GFAs highly depend on whether GVCs are governed in a hands-on or in a market based, loose manner. GFAs are a promising tool in producer-driven chains, whereby approaches targeting consumers are more promising in buyer-driven chains. Assessing a GFA in the apparel sector, Gregoretti and Miller (2011) conclude that impacts on working conditions were uneven with major issues in the areas of wages and health and safety remaining and that new arrangements of industrial relations at the factory were an outcome of the GFA together with local labour action and international, multi-stakeholder campaigns, showing the potential complementarity of these initiatives.

The third stream focuses on broader advocacy networks that support particular struggles linked to GVCs. Alliances of this kind not only cut across the boundaries of national/transnational, but also across production/consumption and labor/community (Munck 2002: 154-173). Particularly scholarship on and from the global South goes beyond traditional 'workplace' issues and takes broader reproductive and livelihood issues into account, including ecological and cultural concerns, and resistance against the (neoliberal) model of development as such. This focus is particularly pronounced in agriculture and natural resource-based sectors but not only. Transnational campaigns, organized by alliances of development NGOs and advocacy groups, often articulate a broader political, social and environmental agenda, including anti-privatization, migrant workers' rights or the de-commodification of nature. Feminists point to the importance of housing and health issues, care responsibilities, and violence in connection with the "commodification of labor".

New terms have been coined to describe this phenomenon as a new form of 'networked worker agency and activism', including transnational advocacy networks (TANs), transnational labor alliances (TLAs) or networks of labor activism (NOLAs). The most prominent campaign here is probably the anti-sweatshop movement in the USA, Australia, Canada, in the European Union (labelled as "Clean Clothes Campaign"). Other examples include ethical campaigning around food and agrofuels production. Another example is the *Global Workers Justice Alliance* which fights for migrant workers` rights. It is

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[4] To date, global unions have negotiated far more than 100 GFAs with transnational corporations (Mezzadri 2020, Ruwanpura 2015).

based on a broad alliance from independent or informal labor unions to development NGOs and human rights activists.

In contrast to the second stream, TAN and NOLA scholarship focuses more closely on grassroots mobilizations around labor and wants to bring "non-unionized (or not solely unionized) worker agency into focus" (Zajak et al. 2017: 901, Nowak 2017) This form of labor-oriented activism is often separate from formal trade union organizing and comparable with a 'community unionism' (Wills 2001) or 'new social movement unionism' perspective (Scipes 1992), which views unions as vehicles for broader socio-political change pursued in alliance with other social movements – women's, ecological, human rights or peace movements. Both old and new social movement unionism has its roots in the global South and is quite distinctive from unionism in the global North. The "old social movement unionism" emerged during the 1970s and 80s in countries like Brazil, South Africa, and South Korea. Trade unionists fought side by side with non-unionized workers and other social movements for democratization and workers' right. The "new social movement unionism" of the late 1990s is, unlike its predecessor, less affiliated with national political parties, or, in general, with national political organizations and takes transnational organizing more seriously (Waterman 1991; Webster et al. 2008, here Chapter 9; Nowak 2017: 968-69, Coe 2015).

Accordingly, activists and academics take a critical view of (Northern dominated) global unions. Transnational union alliances tend to be dominated by their most powerful and financially strong affiliates, i.e. European- or U.S.-based unions, and their views and practices. This is especially true for unions in Western dominated capital-intensive producer driven chains like automotive, machinery, or chemistry. In fact, the greatest successes – and the majority of brokered agreements – have been achieved by IndustriALL Global Union.[5] According to the criticism, many of the global unions have not moved beyond a conception of transnational collective bargaining. Sceptics argue that, beneath the surface, the international confederations` orientation to alliance-building and membership mobilization is "a largely strategic manoeuvre to cope with its weakened status within both the international corridors of power and the radical contours of the global justice movement" (Hodkinson 2005: 36 cited in Webster et al 2008: 196). They are unwilling or afraid to take on global capital (and solidarity with Southern labor), according to the criticism. (Lindberg 2011; Helfen/Fichter 2013: 560; Palpacuer 2019)

Following the two delineated research communities from the second and the third camp, a dividing line seems to exist between those who give priority to the labor issue and labor agency (stream two) and those who see livelihood struggles and rainbow coalitions as transformative forces (stream three). For researchers of the former, workers and their organizations are (the only) strategic actors. They argue that workers have a unique capacity to physically disrupt production and to invoke employment relations institutions on various scales. Only workers, unions, and other members of the labor movement have structural and institutional power. Moreover, workers are embedded in laws, rules and regulations specific to the employment relationships. Thus, transnational labor alliances can afford a set of strategic tools that are unavailable to other types of actors (Brookes 2017; Selwyn 2016).[6] As

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[5] A list of GFAs concluded between IndustrALL and transnational corporations is here: http://www.industriall-union.org/global-framework-agreements
[6] See Burawoy, "From Polanyi to Pollyanna," for the third stream, arguing that commodification (and not exploitation) is the key experience in our world today and that nature- linked struggles for land *and* labor will take the lead.

part of this stream, the focus on various sources of workers' power draws attention to the room for maneuver and strategic choices of workers in concrete contexts.

The above mentioned PRA does good service here if applied in a transnational chain or network perspective. Structural power of workers, for example, can differ substantially according to the firm type and the firm's position in the globally dispersed production network. For example, workers who occupy choke points or bottlenecks in production processes – e.g. by making critical components – enjoy higher levels of power than those making easily replaceable goods (Brookes 2019). Just-in-time delivery and stringent buyer requirements can render supplier firms particularly vulnerable to worker action. For instance, in GVCs with tight quality requirements, such as Fairtrade tea from Kenya, even small disruptions by workers can compromise a farm's ability to meet retailer demands (Riisgaard/ Okinda 2018).

Up-scaling the – originally place-based – power structure approach is indeed a viable undertaking and is once again proving the "added value" of a GVC/GPN perspective: Whether, and, if so, in what manner workers organize themselves depends on their position within the local labor regime *and* their position within the chain or network, i.e. whether they are employed by a lead firm, a strategically important supplier or a low end supplier, for example. Power resources of workers are expanded or constrained, on the one side, by the local labor control regime and capital-labor relations and, on the other side, on a transnational scale by GVC/GPN relations and chain governance. In other words, structural and associational power are related to the workers' position and relationship along the vertical axis of transnational power relations in GVCs, and the horizontal axis of local/national political economy contexts (Marslev et al. 2021; Bair/Werner 2015).

Empirical insights on the complexity of the politics of scale

Reality is of course much more complex and complicated. Outcomes of (transnational) organizing mirror the complexity of the politics of scale in today's GVCs/GPNs. Success is dependent on many factors that also constitute GVCs/GPNs, such as state-business-society relations, overall capital-labor relations and governance structures. Thus, research and its results cut across the broadly and roughly defined camps, showing that the two forms of labor internationalism are not clearly separable.

To start with, union networks can be in fact rather diverse. Meanwhile, they also reach out to the lower ends of GVCs and into services. A good example of transnational union organizing in these sectors is the GFA for private security guards, achieved by UNI Global Union and Service Employees International Union, or the regulations for hospitality workers negotiated by IUF, the International Union that represents workers associations in agriculture and catering. (Helfen/Fichter 2013; McCallum 2015; see also Lindberg 2011: 216) Both of them have a strong foothold in the global South. In addition, there are also union networks "from below" that do not revolve around big Northern based global union federations. The ExChains network, for example, connects garment workers in South and South East Asia with works councils of big buyers in Germany. Goals, strategies, and action are developed on an equal footing. The fairly unknown Rails without Borders network is made up of small and independent unions in European and African countries. Both initiatives cut across the North-South divide and established horizontal, nonhierarchical relationships between its members (Helfen/Fichter 2013; Nowak 2017; Nowak 2016).

If we look at TANs and NOLAs, asymmetric power structures are not absent there either. Dominance of well-equipped northern NGOs can be found in ostensibly "horizontal networks" of advocacy

networks, too. In addition, Wells makes the point that the role of northern agency is privileged in successful campaigns for labor rights thereby neglecting the role of Southern agency. He highlights the fact that local-level activism in factories in the South—in alliance with local communities—is a stronger determining factor of movement success than the activities of northern solidarity groups. While transnational campaigning can play a useful facilitating role, Wells underscores the need to bring local Southern vantage points to the forefront of our analysis (Wells 2009).

From here follows a more critical stance towards cross-border 'networks of labor' approaches, stressing the continued importance of a local and regional focus of many struggles. Given the limitations of joint (class) consciousness, identity and solidarity on a transnational scale, the local still is the central "hub" where the success or failure of labor disputes is decided. Without local struggles and unionization, transnational campaigns remain weak and lose momentum (Ryland 2016). Even if transnational anti-sweatshop campaigns and struggles indicate that often Northern support was crucial to at least some of the workers' gains in labor standards, Northern dimensions of transnational labor politics were not the primary variables; instead they were, as Wells states, auxiliary to what were predominantly local struggles by workers and their allies (Wells 2009: 572, 573)

Studies suggest that Northern advocacy campaigns mostly target lead firms or big buyers and are oriented towards the big consumer markets. Southern labor, however, confronts local authorities, on the firm and national level, and corrupt "yellow" unions. Research brings Southern agency to the forefront by showing the vigorous and determined worker militancy at many sites of global production in the global South. Local struggles and transnational campaigning can complement each other, though. In regions where labor activism confronts authoritarianism connecting the local to the global is essential. To combine local-level activism with internationally organized solidarity and advocacy movements then remains the primary means by which to effectively scale up local struggles. Joining forces with trade unions in the global North can, in such settings, allow workers to connect to institutions and political contexts in other locations, such as formal complaint channels or GFAs, thus opening new avenues to exert pressure on lead firms (Anner 2015; Brookes 2019; Zajak et al. 2017). Similarly, transnational linkages to ethical campaigns, global multi-stakeholder initiatives or civil society campaigns can trigger a 'boomerang' effect whereby extra-local networks are used to upscale workers' struggles and provoke powerful 'outside' actors to intervene or influence behaviours of employers or authorities (Helfen and Fichter 2013; Keck and Sikkink 1998; Merk 2009). Nevertheless, strong local or regional organizational capacities seem crucial. Victories on the workplace and gains at a national or sectoral level can be consolidated and preserved only by local organized forces. Pressure on lead firms and local management to adhere to labor standards is required continuously – also and especially when an international NGO-led campaign has lost momentum or labor code monitors have left.

In any event, the organization of cross-border agency presents a great challenge for the actors involved. While an over-centralization and top-down approach can result in strategies that ignore local contexts and might lead to dysfunctional outcomes, a decentralized structure does not seem to be the solution either. If workers and their allied organizations do not establish a coordinating center – be it a global union federation or an experienced global grassroots network –, they can only have an impact on single nodes of GVCs, at best. Thus, workers' organizations and networks have to respond to specific logics in local and national contexts; at the same time, they need a certain degree of centralization to coordinate action across specific places (Nowak 2021).

In addition to organizational and strategic issues, however, transnational organizing faces much more fundamental barriers. A barrier, as Silver said, comes from the workers themselves: workers maintain boundaries against others in order to defend particular privileges (Wildcat 2005). In other words, conflicts often do not develop along the line of capital, but take on the form of labor-labor conflicts. Many attempts to win gains through cross-border organizing collapsed under numerous obstacles related to conflicts which emerge along divides caused by ideological and strategic differences, resource inequalities and differentiated priorities and access to decision makers and elites (Brookes/McCallum 2017, Zajak et al. 2017, Burawoy 2010).

For Webster, Lambert and Bezuidenhout, the most fundamental challenge to a new labour internationalism remains that of bridging the North-South divide (Webster et al. 2008). Some twenty years ago, also Beverly Silver and Giovanni Arrighi argued that this divide continues to be the main obstacle to the formation of a "homogenous world-proletarian condition", as they call it. Firstly, and in spite of the relocation of industrial activities from North to South, the gap in wealth, status and power between countries and their populations is still huge. Secondly, labor movements in the core have historically more often than not decided that their "bread is buttered" on the side of national-protectionism which involved working-class racism and anti-immigrant stances (Silver/Arrighi 2000: 53, 71)

Conclusions

This article gives an overview of literature on GVCs/GPNs and labour and specifically on the role, limitations and possibilities of transnational organising in GVC/GPNs. GVC and GPN research has clearly evolved and incorporated workers and concepts from labour research into their theoretical and particularly empirical analysis. In turn, labour research from different perspectives has taken up a chain and network perspective that help situating labour exploitation and struggles into multi-scalar hierarchical contexts, sector dynamics and lead firm strategies. These relations are mutually fruitful, providing a broad case study literature on experiences of workers and their agency in global production in many sectors and locations.

Labour as a transnational actor has been approached from different actors' perspectives, but there are common challenges related to organisational issues, interest conflicts and different priorities, resource inequalities and power asymmetries among actors within transnational organising. A GVC/GPN perspective can help to understand such asymmetries and the material possibilities and limitations of solidarity between workers in different positions in chains and networks. Information on the structure of chains and networks, their power relations and value expropriation and distribution can also help to find the leverage points to interfere with firms' strategies, relationships and resources around the world.

It is clear that a multi-scalar perspective that takes into account these power asymmetries between actors and locations and the importance of the local scale, local actors and struggles is crucial for successful labour organising. Transnational relations have supported organising and struggles, but without a local base, transnational initiatives and campaigns remain weak and unsustainable. Further, labour organizing and struggles always have to be seen in relation to the counterstrategies of capital and states. Particularly in this combination, GVC and GPN approaches have a strong potential in assessing the interactions between firms, workers, other civil society actors and states at different levels, related power dynamics and associated outcomes. The more thorough appreciation of labour

in GVC and GPN research in the past decade and related power dynamics, struggles and (uneven) outcomes have helped to reach this potential.

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