The Weaving of Legitimacy: NGOs and Labour Regulation in the Global Garment Industry

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To the workers that make the clothes I wear and the organizations that work with them to put an end to exploitation.

Contents

List of Tables

List of Figures

List of Appendices

List of Acronyms

CCC	Clean Clothes Campaign
CDA	Critical discourse analysis
CSO	Civil society organization
CSR	Corporate social responsibility
FWF	Fair Wear Foundation
GCC	Global commodity chain
GPN	Global production network
GVC	Global value chain
ILO	International Labour Organization
IPE	International political economy
MSI	Multi-stakeholder initiative
NGO	Non-governmental organization
RMG	Ready-made garment
TNC	Transnational corporation
UN	United Nations

Abstract

The garment industry has reached global proportions over the last decades, driven by transnational companies that outsource manufacturing processes to suppliers in the Global South, in an attempt to save costs and maximize their profits. This business model has affected the well-being of workers, since factories maintain their competitive position by engaging in exploitative labour practices. International NGOs based in the Global North have strived to improve workers' conditions through advocacy and support strategies, but their efforts are challenged by disputes over their legitimacy. This research aims at understanding how two of these organizations (Clean Clothes Campaign and Fair Wear Foundation) justify their legitimacy to participate in the regulation of labour in the global apparel business. An analytical framework for the study of NGO legitimacy justification is constructed and applied, employing Critical Discourse Analysis methods and various theoretical approaches to value chain governance, labour improvement and legitimacy.

The findings suggest that both organizations promote a rationale of supply chain responsibility for improving labour rights' respect. However, the tactics and tools that they develop to achieve it differ, given their distinct strategic positions in the industry. FWF seeks compliance with labour standards by promoting cooperation and building capacity for self-regulation among actors linked to the production processes. Meanwhile, CCC attempts to generate solidarity relations in the realm of civil society to push for binding regulations in the sector. This distinction extends to their legitimacy claims, which reveal different critical resources available for the organizations to exert influence in the governance of the industry. Their approaches can be interpreted either as converging in instituting a new programme of government in the apparel business or as tending towards a divergence, which may hinder further improvements in workers' rights.

Relevance to Development Studies

The exploitative conditions experienced by workers at the most labour-intensive stages of apparel production have been the focus of abundant research and civic action in recent years. A significant number of initiatives from NGOs have proliferated in the Global North with the aim of promoting the recognition and guarantee of labour rights for garment workers in the South. These organizations have produced discourses and practices that are regarded as potential counterweights to the logics of corporate-led globalization and as

mechanisms for re-regulating labour relations in the absence of global institutional frameworks that effectively protect workers.

However, NGOs have also been subject to criticism due to an alleged lack of representativeness, low effectiveness and limited up scaling capacity of their interventions. Moreover, their ability to contribute to the emancipation of workers, rather than promoting palliative strategies that may solidified the current international *status-quo*, has also been the focus of considerable debate. Such concerns, cast doubt on the legitimacy of NGOs struggling for the advancement of workers' rights at the international level.

This, in turn, poses challenges for the sustainability of these organizations, the discourses and initiatives they promote and, consequently, for new forms of regulation that seek to improve the wellbeing of workers in global supply chains and improve their developmental outcomes. This research contributes to these debates by proposing a framework for understanding, from a comparative perspective, how NGOs justify their legitimacy to participate in the regulation of labour in the apparel industry.

Keywords

Chapter 1:   Introduction

1.1. Background, justification and research questions

Over the past decades the apparel industry has experienced deep restructuring processes under the leadership of transnational corporations (TNCs) that seek to reduce costs and maximize profits through the offshore outsourcing of manufactured products. This business model has raised concerns for its impact in the well-being of workers and in patterns of development in producing countries. Divergent interpretations on this issue, stemming from various ideological and strategic positions, have proliferated among actors that attempt to shape the terms of the debate and direct the processes towards particular outcomes, like increased productivity, economic growth or wealth redistribution. Some of the most influential voices in this discussion have been Western-based non-governmental organizations (NGOs) that struggle for improving working conditions in producing countries (Palpacuer 2008, Utting 2005).

These NGOs have developed distinctive approaches to the phenomenon that highlight how dominant relations among buyer and supplier firms generate pressures for the latter to minimize production costs, leading to a widespread disregard of labour rights. This narrative has gained recognition in recent years, sparking demands for socially responsible behaviour from TNCs, with NGOs at the forefront of promoting new forms of regulation in the industry. However, these attempts have been contested by actors that question the legitimacy of the organizations on the basis of alleged lack of representativeness, effectiveness or transformative capacity (Charnovitz 2006, Kovack 2006). Such claims cast doubts on the impact and sustainability of new forms of regulation that these NGOs attempt to institute (Lipschutz 2003, O´laughlin 2008).

Although this phenomenon has been recognized in academic literature (Edwards 1999, Knorringa 2010), there are still few systematic analyses that seek to understand how Northern NGOs manage to take part in the governance of global industries, in spite of existing disputes over their legitimacy. This research attempts to contribute to fill that gap, by examining the discursive practices through which those organizations justify their legitimacy and their implications for the governance of the garment industry. A comparative perspective is adopted in order to qualify this understanding, by contrasting the claims of two international NGOs based on The Netherlands, which work from different approaches for improving labour conditions in the apparel sector, namely, Clean Clothes Campaign (CCC) and Fair Wear Foundation (FWF).

Therefore, the study asks how NGOs justify their legitimacy to participate in the regulation of labour in the global garment industry, what are their similarities and differences. These questions are operationalized, in light of the analytical framework presented below, through three research sub-questions: a) how do these organizations interpret labour-related problems in the industry and the ways to address them?; b) what claims of legitimacy to participate in the regulation of labour are employed by them?, and c) what implica-

tions do their interpretations and claims of legitimacy have on the governance of the sector?

To address these issues the research adopts a constructivist epistemological perspective and critical discourse analysis (CDA) methods. From this perspective language is seen as a central practice in the social production of reality that simultaneously functions to represent the world and to enact social relations (Fairclough 2003). Subsequently, the study focuses on the examination of organizational discourses to understand how the NGOs interpret the reality in which they operate and the effect of their interpretations in transforming that reality (Grant et al. 2004). For this purpose, the paper draws upon theoretical developments on economic globalization, work and legitimacy, as well as the dialectical-relational approach to CDA (Fairclough 2001, 2006, 2009), to propose a framework for analyzing NGO legitimacy justifications.

In this framework, legitimacy is conceptualized as a dynamic social construction that is related to an organization's capacity to provide justifications about the desirability and appropriateness of its actions, being partly achieved through discourse (Hudson 2001, Fairclough 2009). Hence, the justification of legitimacy by NGOs is seen as a process comprising four interrelated analytical dimensions. First, the practices and relations that constitute the organizations' environment and shape their range of discursive and material resources. Secondly, the interpretations of NGOs on labour-related problems of the global garment industry and alternatives to solve them. Thirdly, the claims of legitimacy made by NGOs to take part in the regulation of the sector. Finally, the effects of these discourses on the governance of the industry.

The arguments in this paper are elaborated in four steps that match the dimensions of the analytical framework, identifying key similarities and differences between the two NGOs. It is argued that the organizational environments of the CCC and FWF set particular boundaries on their discursive practices, leading them to produce different interpretations of labour problems in the apparel sector and the alternatives to address them. Subsequently, the NGOs employ legitimacy claims to justify their intervention that rely on distinct notions of associability, performance and credibility. These discourses are embodied in messages, tools and tactics, which together configure programmes of government through which the NGOs attempt to re-shape current patterns of governance in the apparel industry, to secure the respect of labour rights.

The remainder of this paper elaborates and qualifies this argument, starting from an account of the methods employed to address the research questions and a review of related debates in the literature, which together assemble an analytical framework for studying NGO legitimacy justification. Within that framework, the paper locates the environments in which the two NGOs have evolved (chapter 3), examine the way in which they frame labour-related problems in the apparel industry and its possible solutions (chapter 4), and identify the claims used by them to justify their participation in the sector's governance (chapter 5). The last chapter pulls the threads of the argument together to discuss the im-

plications of their discourses in the governance of the apparel industry and their relation to broader development debates.

1.2. Research methods

In order to render the topic 'researchable', the study adopts a methodology that incorporates research methods and theoretical perspectives (Fairclough 2006, Prichard et al. 2004). The selection of research methods is related to the types of design, techniques for data collection and analysis employed in the investigative process. This research is designed as a qualitative and comparative case study (Yin 2009) focusing on the CCC and FWF, two international NGOs based in The Netherlands that promote the improvement of labour conditions for garment workers in the South.

The selection of these cases was motivated by their high degree of visibility, trajectory, and by the fact that they represent two distinct paradigms for fostering enhanced working conditions in the apparel industry, making them fruitful examples for comparison. Indeed, while the CCC is an advocacy organization formed by trade unions and NGOs, the FWF is a multi-stakeholder initiative governed by business associations, NGOs and unions that provide support and verification to private companies in the apparel sector[1]. Given the extensive range of activities of both organizations, a particular focus was set on two strategies undertaken by each NGO[2]. Furthermore, these strategies are analyzed in the context of the ready-made garment (RMG) industry in Bangladesh, one of the leading exporters in the sector that has recently received international attention due to a succession of factory disasters in which thousands of workers have been injured and killed (CCC-201, CCC-203).

The study rests epistemologically on a moderate form of constructivism, in which social reality is assumed to be produced through dialectical interactions among language and other material practices and relations –power structures, institutions (Fairclough 2001, Broadfoot et al. 2004). From this perspective, analyzing the discourses of the CCC and FWF provides a suitable point of entry for study their justifications of legitimacy since, as noted by Grant et al., 'everyday attitudes and behaviour of an organization's members, along with their perceptions of what they believe to be reality, are shaped and influenced by the discursive practices in which they engage' (2004: 3). Organizational discourse, in the context of this research, is defined as a 'structured collections of texts embodied in the practices of talking and writing... that bring organizationally related objects into being as these texts are produced, disseminated and consumed' (Grant et al. 2004: 3).

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[1] A profile of the CCC and FWF is presented in appendix 1. Appendixes 2 and 3 present their organizational charts.

[2] The strategies are: in the case of CCC, 'Developing and circulating appeals for urgent action' - Urgent appeals - and the campaign 'Fire and Building Safety' in Bangladesh. In the case of FWF, the 'Complaints Procedure' and 'Preventing Violence against Women Garment Workers in Bangladesh and India'. For further information on the criteria for selection and description of the strategies see appendix 4.

Since texts are considered to materialize organizational discourses and be their most basic unit of analysis, a corpus of texts constitutes the main source of empirical data for this study (Fairclough 2001, Flick 2009). These texts were gathered using two collection methods. First, documentation, through the revision of a number of texts produced and published by each organization, containing both general information and specific accounts on the strategies selected. And secondly, qualitative semi-structured interviews conducted with some of the NGOs' staff members in order to support the information collected through documentation. Additional interviews were conducted with members of other civil society organizations (CSOs) to collect further information on the operation of the garment industry[34].

The analysis of the texts is informed by the dialectical-relational approach to CDA developed by Norman Fairclough (2001, 2003, 2006, 2009), which examines discourse at three levels. The first level looks at discourse as *text*, which refers to its formal properties like vocabulary, metaphors, grammar, structure and genres. The second level sees discourse as *interaction*, analyzing processes of production, distribution and consumption of texts. And the third level studies discourse as *social practice*, addressing broader institutional and social structures in which discourse is embedded. This approach pays particular attention to relations between discourse, power and ideology, and recognizes that discourses are never fully cohesive, which make them subject to contestation, allowing space for change as actors 'move between and across multiple discourses' (Hardy and Phillips 2004: 304).

Hence, the arguments presented here are the product of an examination of the corpus of texts gathered for the research in the three levels of the dialectical-relational approach[5]. The analysis is informed by a theoretical reading based on the literature review and analytical framework presented in the next section. All the material examined was treated symmetrically to identify linguistic patterns, themes, practices, genres and contexts, seeking to condense them around clusters of meaning that allow for a systematic interpretation of the findings in light of the research questions (Broadfoot et al 2004).

Lastly, in the context of CDA it is fundamental to situate the researcher as an agent that embodies assumptions and positionalities, which affect the choices made during the investigative process. Equally important results to acknowledge that the research report is in itself a discursive production located in particular social relations and intended to persuade the reader (Prichard et al. 2004). In this sense, the author approached the study as a scholar and former member of development NGOs and multilateral agencies operating in the South, who is committed to goals of social justice and emancipation, and is confident on the potential of collective action at different scales to achieve them. Conducting the inquiry in a critical and systematic manner, as required in an academic environment, demanded a constant reflection on own biases and assumptions. It entailed being aware of

[3] See Appendix 5 for a complete list of the analyzed texts and the codes assigned to them.
[4] See Appendix 6 for a list of the interviews conducted for this research.
[5] Appendix 7 presents the matrix of questions through which the analysis of the texts was operationalized.

alternative interpretations and counter-arguments to address a highly politicized and sensitive issue for NGOs, that is, their legitimacy to participate in processes of global governance[6].

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[6] Majot notes that 'the presence, absence or extent of legitimacy is judged, fairly and unfairly, for reasons both transparent and covert, for points of principle and for points of political gain… criticism intended to imply that a campaign lacks legitimacy can easily be perceived as ideologically motivated' (2006: 222).

Chapter 2: Globalization of production, work and NGOs: A framework for analysis

It was suggested earlier that the methodology adopted here consists of research methods and conceptual perspectives that are integrated in a unified analytical framework. Thus, having paid attention to the data collection and analysis methods, this chapter examines a number of theoretical approaches to economic globalization, improvement of labour conditions and the role of NGOs. These debates inform the interpretation of empirical evidence and allow operationalizing the comparison of FWF and CCC's discursive practices.

2.1. A review of current debates

In the past decades the world has experienced an unprecedented intensification of economic and social flows across national borders, commonly associated to globalization processes[7]. One of its most visible dimensions is the functional re-organization and geographical dispersion of commodity production led by TNCs, which have impacted patterns of accumulation, consumption, labour control and development throughout the globe (Gibbon et al. 2009). In an attempt to grasp the complexities of this phenomenon (Gereffi 2013), a myriad of theoretical explanations have proliferated in the social sciences, providing diverse interpretations on its origins, consequences and governing systems (Bair 2009).

In this context, Gibbon et al. (2009) identify three dominant approaches to the study of global economic governance. First, *'mainstream' international political economy* (IPE) that, rooted in the utilitarian tradition, attempts to explain interactions among states, processes of policy making and the operation of institutions at the international level (Palan 2000). Secondly, *radical IPE*, associated primarily with structuralist and post-structuralist postures, which seeks to understand systemic logics of contemporary capitalist development with a focus in the exercise of power through governmentality (Rose and Miller 1992) and regulation (Jessop 1997, 2000, 2004).Lastly, *Global Commodity Chains* (GCCs) and *Global Value Chains* (GVC) which emerged in the field of economic geography and are interested in intra and inter-firm relations along different stages and geographical locations of commodity production (Bair 2009, Gereffi 2013).

In addition, the *Global Production Network* (GPN) approach has emerged recently as a variant of GCC and GVC that attempts to correct their perceived 'firm-centrism' (Bair 2009), by recognizing in the analysis of economic globalization 'the whole range of actors that contribute to influencing and shaping global production... (and) the social and institutional embeddedness of production' (Barrientos et al. 2011: 321). Moreover, the GPN approach incorporates attributes of radical IPE analyses, by acknowledging the 'material and

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[7] Globalization can be defined as the 'widening, deepening and speeding up of worldwide interconnectedness in all aspects of contemporary social life' (Held et al. 1999: 2). The notion of globalization and its implications remain highly debated in the social sciences. See Held et al. 1999, Hirst and Thompson 1999, and Fairclough 2006.

discursive dimensions of GPNs, their political contestation and the various forms of power and value (that they embody)' (Coe et al. 2008: 209).

In line with these developments, the notion of governance[8] has evolved as well in the field of GVC and GPN to encompass diverse meanings. An initial perspective refers to governance as *driveness*, which is related to the authority – of buyers or producers - to determine the allocation of resources in a chain (Gereffi 2013). From another perspective governance is understood as *coordination of networks*, emphasizing technical characteristics of the chains to explain different forms of inter-firm interaction, such as the degree to which information can be codified and the capacity of suppliers (Gereffi 2013). More recently, governance has been analyzed from all-encompassing perspectives as *governmentality* and *convention theory*, in which prevailing rationales or particular expectations of actors are said to shape the behaviour of agents and the exercise of power in the chains (Gibbon et al. 2009). These analytical lenses not only embody different understandings about power dynamics in the chains, they result also in the identification of distinct developmental problems associated to them and, eventually, in diverse prescriptions for action (Knorringa and Pegler 2006, Palpacuer 2008).

For instance, it has been noted that buyer-driven chains[9] are particularly susceptible to externalization of risks by TNCs to their suppliers in the South, which produce patterns of flexibilization, informalization and feminization of work in producing countries through mechanisms of 'labour control at a distance' (Lee et al. 2011, Palpacuer 2008, Pegler 2011). Other accounts highlight instead the negative impact of certain types of chain governance on the ability of Southern producers to upgrade their economic activities and capture higher benefits, hindering the achievement of better developmental outcomes (Gereffi 2013). Alternative interpretations link the increasingly insecure conditions experienced by workers in producing countries to prevailing managerial discourses and paradigms of financialization and shareholder-value, which provide 'repertoires of justification... to legitimize specific functional divisions of labour along GVCs' (Gibbon et al. 2009:325).

Despite their different focuses, these analyses tend to identify common trends towards 'deteriorating work conditions down the (commodity) chain, as a result of enhanced competitive pressures passed on to workers by suppliers in the form of more insecure and precarious work, harder work pace and greater threats to workers' organizing efforts' (Palpacuer 2008: 402). Such phenomenon has been interpreted in scholar and practitioner debates through the lenses of precarious work, which highlights the existence of several

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[8] Governance in GCC/GVC has been defined as the 'concrete practices and organizational forms through which a specific division of labour between lead firms and other economic agents involved in the conceptualization, production and distribution of goods in global industries is established and managed' (Gibbon et al. 2009: 319).

[9] For Gereffi, in buyer driven chains 'retailers and marketers of final products exert the most power through their ability to shape mass consumption via dominant market shares and strong brand names' (2013: 5).

forms of insecurity[10] that affect workers at different nodes of globalized industries (Kantor et al. 2006). This precarity has in turn been related to processes of adverse incorporation, whereby workers are included in the labour market in exploitative conditions that preclude or reduce their 'possibilities for accumulation and, consequently, the achievement of longer-term security, thus perpetuating the chronic nature of their poverty and vulnerability' (Phillips 2011: 9).

In this context, diverse approaches to the definition of labour-related problems and alternatives available to address them have emerged in the social sciences. Table 1 presents an attempt to categorize four of the most influential approaches. The *market* perspective, rooted in neoclassical economics, assumes that improvements in working conditions result automatically from freely operating markets and upgraded suppliers' position in the chains (Milberg and Winkler 2011). The *institutional* view acknowledges market and state failures, and seeks to establish institutional arrangements to regulate employment relationships (Palpacuer 2008, Barrientos et al. 2011). The *radical* perspective conceives the problems as originating on systemic processes of capitalist exploitation of labour and links the improvement of workers' conditions to class struggles and collective mobilizations by labour (Selwyn 2013). Finally, the emerging *local-inductive* approach explores subjective dimensions of the labour process as experienced by individuals with particular intersecting positions in the productive and reproductive spheres, as well as the everyday strategies they develop to improve their livelihoods (Carswell and De Neve 2013, Pegler 2011).

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[10] The notion of precarious work is related to seven work-based insecurities: labour market insecurity; employment insecurity; job insecurity; work insecurity; skill reproduction insecurity; income insecurity; and representation insecurity. See Kantor et al. 2006.

Table 1: Approaches to labour-related problems and improvement in global supply chains

Approach	Nature of the problem	Assumptions underlying the solution	Strategies for improvement	Labour-management relations	Leading actors
Market	insufficient liberalization of factor markets; Low productivity of labour; lack of integration to international markets	Societal benefits derive from maximization of shareholder value; Economic upgrading leads automatically to improvement in workers' conditions	Increase productivity of labour; remove barriers for free operation of labour market; adopt strategies for economic upgrading	Human resource management, vertical	Firms
Institutional	Imperfect labour market functioning; lack of appropriate regulation and enforcement of labour rights	Improvement of workers' conditions achieved through regulating and monitoring labour relationships; private firms should adopt socially responsible behaviours to respond to multiple stakeholders	Adoption of International/ national and public/private regulation; implement CSR programmes; develop corporate accountability strategies and Multi-stakeholder verification	Social dialogue, industrial relations	Trade unions, firms, governments, NGOs, multilateral agencies
Radical	Systemic exploitation of workers and extraction of surplus value in capitalism	Improvement of workers' conditions achieved by workers' struggles from below and re-structuring of capitalist accumulation logic	Develop grassroots political mobilization; promote workers' empowerment; resistance at the workplace	Class conflict, social mobilization	Trade unions, social movements
Local-inductive	Intersectionalities constrain people's decision-making and agency; restriction of material, social or human capital	Notions of improvement are subjective and dynamic according to gender, life-cycle, skill level, etc.; Workers have agency to influence production processes	Every day and informal practices to improve livelihoods; intersecting strategies in the production and reproduction spheres	Complex, context-specific, dialectical	Individual workers, communities

Source: prepared by the author based on Carswell and De Neve 2013; Palpacuer 2008; Pegler 2011; Selwyn 2013; Razavi 1999.

These approaches are informed by various ideological and strategic considerations that make them dynamic and internally diverse. Moreover, as they co-exist discursively and materially at different levels, particular interpretations and elements associated to them tend to be privileged by actors in different contexts and at distinct historical moments. These interactions can produce effective transformations in the governance of supply chains, as actors participating in them (firms, governments, trade unions, NGOs) rely on assumptions, language and strategies pertaining to different approaches to advance their interests and influence others' behaviour.

In this sense, the market approach was particularly dominant during the wave of economic liberalizations promoted under the Washington Consensus agenda. However, after strong evidence was presented by scholars and activists on its negative effects on workers' well-being (Knorringa and Pegler 2006), the institutional perspective has increasingly gained ground, generating a multitude of regulatory initiatives (Palpacuer 2008). Such initiatives are located at different scales (local, national, regional, international), but have increasingly privileged global spaces as a sites for promoting the improvement of labour conditions, leading increasingly towards an 'internationalization of policy regimes' (Jessop 1997: 575).

The institutional perspective is epitomized by the notion of social upgrading, defined as the 'improvement in the rights and entitlements of workers as social actors' (Barrientos

et al. 2011: 324). These rights include measurable standards (for example, type of contract and working hours) and enabling or process rights (for example, collective bargaining and unionization). However, the notion of social upgrading has also received criticisms for being perceived as a top-down approach to labour issues, in which objective improvements are expected to be delivered by agreements among elite actors, leaving little room for workers' agency (Coe et al. 2008, Carswell and De Neve 2013, Selwyn 2013).

In the midst of those debates, western-based NGOs[11] have consolidated their role as prominent agents in the promotion of regulatory mechanisms for improving Southern workers' conditions in global industries (Palpacuer 2008, Utting 2005, O'laughlin 2008). As suggested by Edwards and Hulme, these organizations 'attempt to alter the ways in which power, resources and ideas are created, consumed and distributed at global level, so that people and their organizations in the South have a more realistic chance of controlling their own development' (2002: 87). This role has been possible partly due to what some authors call a shift from 'government to governance', in which nation-states are no longer seen as the sole space for regulation and decision-making, and by an increasing 'de-nationalization' of civil society's struggles (Jessop 1997, Rhodes 2012).

The intervention of NGOs in the regulation of global industries is usually enacted through two types of functions, operational and advocatory. *Operational* functions consist in the provision of services and support, for instance, training and verification for firms attempting to improve labour conditions. Meanwhile, *advocacy* functions aim at influencing other actors' perceptions and behaviour, monitoring and denouncing violations of institutional frameworks, as well as striving to transform social practices in the industries (den Hond 2010, Williams et al. 2011).

The rising visibility of NGOs' efforts has led to debates about the effects of their interventions, in which two opposite arguments are commonly advanced (O'laughlin 2008). On the one hand, NGOs are seen as possible counter-weights to the power of TNCs, with the potential to create spaces for transforming the current model of economic globalization by filling regulatory and accountability gaps (Palpacuer 2008, Scholte 2011, Utting 2005). On the other hand, they are said to shift issues that are inherently political and should be subjected to public debate and state intervention, to the realm of the technical and the private, overlooking structural power imbalances and hampering transformative interventions (Lipschutz 2003).

Beyond these differences, shared concerns are found in the literature on the 'often assumed but unsubstantiated legitimacy of NGOs to speak on behalf of 'the poor' or the 'oppressed' or 'the concerned' or other relatively vague constituencies' (Knorringa 2010:

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[11] While there is no consensus on the literature over a single definition, NGOs can be characterized as 'self governing, private, not for profit and with an explicit social mission' forms of organization, that are usually 'linked to each other in networks or alliances that sometimes take the form of more formal associations' (Jordan and Van Tuijl 2006: 8).

85). In this context, legitimacy refers to a 'generalized perception or assumption that the actions of an entity are desirable, proper or appropriate within some socially constructed system of norms, values, beliefs and definitions' (Suchman as cited by Hudson 2001: 341). This conceptualization highlights the socially constructed nature of legitimacy and its embeddedness in context-specific rationalizations of the world. Moreover, legitimacy is related to an entity's capacity to provide justifications through discursive and material practices about the desirability and appropriateness of its actions (Hudson 2001).

In the case of international NGOs, perceived legitimacy deficits are usually associated with three arguments. First, their scarce democratic *representativeness* and accountability to the populations whose interests they claim to promote (Heery 2010, Kovach 2006). Secondly, the low degree of *effectiveness*, sustainability and scaling potential of their initiatives (Bulut and Lane 2010, Palpacuer 2008, Riisgaard 2005). Lastly, their questioned *credibility* and autonomy from vested interests in global industries (Lipschutz 2003). Conversely, other voices extol the legitimate character of these organizations on the grounds of their values-based nature and proximity to vulnerable populations; technical expertise and efficiency, and ability to interact with a broad range of stakeholders (Edwards and Hulme 2002, Houtzager and Gurza Lavalle 2010, Jordan and van Tuijl 2000, Kovach 2006).

These claims are underpinned by different assumptions on the sources of NGO legitimacy, their roles in development and their distinctive value for improving processes of global governance (Edwards 1999). Such contradictions reveal the high complexity and contested character of NGO legitimacy, both from an analytical and a practical perspective, which demands the construction of a comprehensive approach for its study.

2.2. Analytical framework

Drawing upon CDA research methods and the conceptual debates presented above, this section advances an analytical framework for examining and contrasting justification of legitimacy by NGOs in the context of labour regulation in a globalized industry. Figure 1 presents a simplified representation of this process at the organizational level, which builds upon the understanding of NGO legitimacy as a social construction, produced in the continuous interaction of discursive and material practices that occur simultaneously within and outside the organization. Although in reality these dimensions are profoundly intertwined and dynamic, they are illustrated here as discrete processes and captured in a 'snapshot' manner to facilitate the analysis. This framework employs organizational discourse as the main point of entry for analysis, which is not to say that language is the only element intervening in the production of legitimacy, rather it is embedded in social processes that comprise discursive, as well as non-discursive practices.

Figure 1: Analytical framework for NGO legitimacy justification
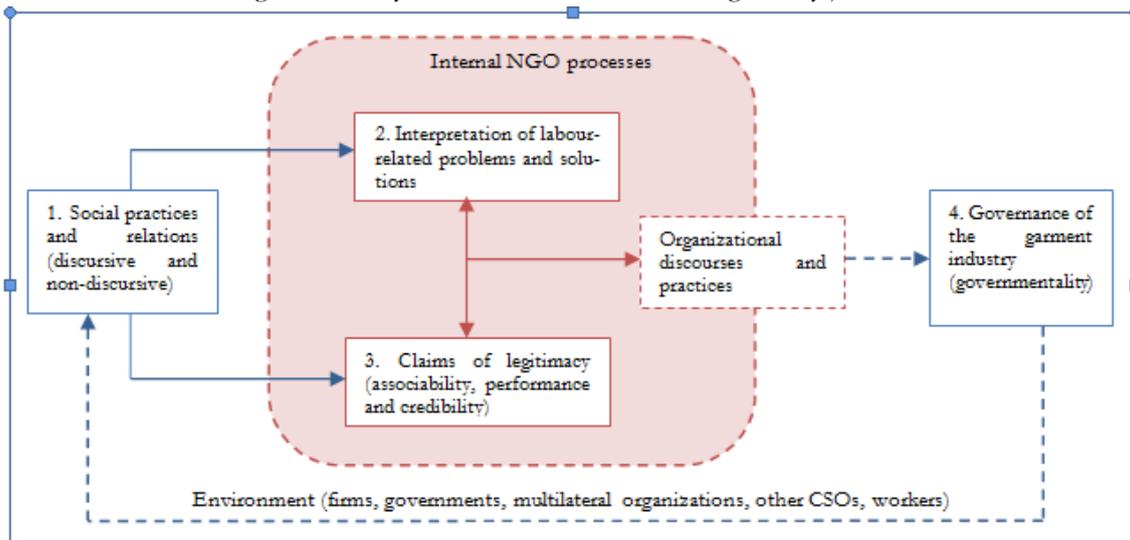
Source: Prepared by the author

With these initial considerations, the process of legitimacy justification by NGOs can be thought of as comprising four dimensions. The first dimension (figure 1, point 1) acknowledges that the organizations do not exist in a vacuum nor they construct reality unconstrained, rather they are influenced by *social practices and relations* in their environments, which shape their field of possible interpretations and actions (Fairclough 2001, 2006). Those practices are associated, for example, to patterns of interaction between actors in the garment sector and to the expectations of different actors on the roles of NGOs. Thus, the first dimension configures the backdrop against which the NGOs produce their discourses, influencing simultaneously their interpretations of the industry's problems and their role in addressing them.

The second dimension of the framework (figure 1, point 2) consists in processes through which the organizations *interpret labour-related issues* in the apparel business and the alternatives for their solution, that is, the conceptions embodied in their discourses on how the industry currently functions and how it should work. These ideas are rooted in normative considerations about the governance of global economic processes, which are informed in turn by different ideological and strategic considerations. As noted by Hardy and Phillips, 'the way in which a problem is defined... places limits on the potential nature and outcome of interactions and plays an important role in determining who has a legitimate case for membership in the collaboration... (it) is an important mechanism through which power is exercised' (Hardy and Phillips 1998: 220).

The third dimension (figure 1, point 3) looks at the *claims of legitimacy* produced by the NGOs to act in the solution of those problems, which reflect how the organizations perceive themselves in relation to other actors in the industry (firms, workers, governments). Hence, NGOs' discourses incorporate assertions about the desirability of their actions on the basis of their associative capacity, high performance and credibility. These claims endow them discursively with distinctive advantages and critical resources for participating in the regulation of labour in the sector.

Together, these interpretations and claims configure the organizational discourses that allow the justification of legitimacy and shape the material practices of the NGOs, flowing from the 'inner forum' of the organizations towards their external environment. In this sense, the picture of this research would be incomplete if no attention was paid to the implications that these claims may have on the *governance of the apparel industry*, which constitutes the fourth dimension of the framework (figure 1, point 4). In order to better understand this process, the notion of GVC governance as governmentality proposed by Gibbon and Ponte seems appropriate, as it considers governance not only as 'a type of relation between firms but also as an expert discourse… (Consisting of) programmatic rationalizations of the proper roles of economic agents and institutions and... a set of techniques and tactics for engineering conformity to these roles' (2008: 366 -367).

If this conceptualization is accepted, it is possible to draw a relation between the interpretations and claims produced by NGOs and their attempts to (re)shape the governance of the sector in specific ways. In other words, it is assumed that in producing discourses to justify their legitimacy, the organizations transmit particular messages and develop tools and tactics that have the potential to modify prevailing rationales for coordinating economic activities in the sector[12]. However, NGOs' discourses compete with each other and with those of other actors to influence the operation of the industry. This implies that there is hardly any immediate effect of individual organizations' discourses on the overall functioning of the sector. Moreover, their discourses may have implications in the organizational environment beyond the relations between firms and workers in, for example, affecting the regulatory role of the state or the spaces for political action available for other actors (Jessop 2000).

In sum, the framework for comparing the legitimacy justifications of the NGOs, consists of social practices and relations that constitute their organizational environments, their interpretations of labour-related problems and solutions, their claims of legitimacy to act on the identified problems, and the potential effects of their discourses in the governance of the industry. Each of these dimensions is addressed sequentially in the following sections of this paper. The analysis employs CDA methods to examine the empirical evidence and is informed by the theoretical debates presented above on the governance of economic globalization, improvement of labour conditions and NGO's legitimacy.

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[12] Gibbon and Ponte operationalize the concept of governmentality through the notion of 'programmes of government' developed by Rose and Miller (1992), which comprises three analytical categories: '(1) a guiding rationality specifying the ideals of the programme and defining the true nature of the objects to which government is applied (a rationale); (2) a set of analytical tools (a toolbox); and (3) prescriptions for action in relation to judgements obtained using these tools (tactics)' (Gibbon and Ponte 2008: 367-368).

Chapter 3:   Situating the organizational environments

In light of the analytical framework introduced before, the first dimension to be addressed is concerned with social practices and relations that structure the actions of CCC and FWF, constituting their organizational environments. Understanding the contexts in which the NGOs are situated is fundamental prior to entering into the analysis of their discourses. These environments determine the resources available for the organizations to define problems, relations and forms of intervention in garment supply chains. Thus, this section examines the functioning of the apparel industry at the global and Bangladeshi levels, noting that the different approaches of the NGOs can be partly traced to their origin in distinct stages of the sector's development. Furthermore, it is argued that NGOs' practices are influenced by diverse expectations of other actors about their roles in the industry, which place pressing and, at times, contradictory demands on them.

3.1. The global garment industry

From its inception in the early 19th century, the modern clothing industry has been repeatedly denounced as an epicentre of workers' exploitation (Sluiter 2009). In recent decades, trade liberalization and the availability of new technologies facilitated the geographical dispersion of apparel supply chains throughout the globe. This process was largely driven by TNCs that source their products from vast networks of suppliers in countries of the Global South, which proliferated in the absence of high capital barriers to entry in the industry (Bulut and Lane 2010). The dominant position achieved by international buyers in these chains, allowed them to maximize their profit through retailing strategies that implied short delivery times, greater number of fashion seasons a year, volatile orders and stagnant or declining prices for manufactures (Anner et al. 2013).

In a context of high domestic and international competition, suppliers strived to meet these requirements by reducing their most significant production costs, labour-related expenditure. As a result, garment factories are likely to offer low wages and long working hours to their employees, avoid social security payments and ban unionization processes that could counteract these tendencies. In this sense, factories take advantage of loose regulatory environments and the availability of low-skilled labour, in order to maintain their competitive position in international markets (Anner et al. 2013). Moreover, according to Bulut and Lane, these insecure conditions are frequently not only allowed, but actively promoted by governments that 'exploit their cheap and abundant labour to attract foreign capital' (2010: 44).

In response to these conditions, initiatives that attempt to counter dominant business practices in the industry to guarantee labour rights, multiplied recently in the Global North, taking the form of advocacy campaigns, multi-stakeholder initiatives (MSI), fair trade certification and multilateral frameworks (Lipschutz 2003). CCC and FWF are two of those ini-

tiatives, which embody different organizational structures and working approaches to the improvement of labour conditions in the sector[13].The differences between the two NGOs, can be understood partly as a result of distinct perceived needs at two historical periods of the industry's evolution, which is evidenced in the discourses that each organization produces about its origins.

The CCC was created during a period of rapidly advancing liberalization of markets in the wake of structural adjustment programmes, when the adverse effects of offshore outsourcing on workers' well-being were still widely unrecognized (Sluiter 2009). In this context, a crucial concern for CSOs was informing the European public about poor working conditions and exploitative labour relations in garment-producing countries:

> Schone Kleren Campagne (Dutch name for CCC) started in 1989, when Dutch and British women and solidarity groups protested the dismissal of striking workers in a garment factory in the Philippines... That year the workers picketed the premises while in the Netherlands and United Kingdom a solidarity campaign was organised. Thus began the campaign for 'clean clothes': telling the world of the demands of Southern women and workers' organisations (CCC-01: 16).

This 'foundational narrative' (Borrowing and Morris 2012: 33) highlights the origins of CCC in the terrain of transnational activism, bringing together women organizations, consumer groups and trade unions in The Netherlands and other European countries. This coalition systematically denounced companies that failed to comply with labour standards in their supply chains and advocated for the regulation of the sector (Sluiter 2009). In reaction to these campaigns and rising awareness among consumers, a variety of corporate social responsibility (CSR) initiatives aimed at improving workers' conditions proliferated among garment companies.

As this regulation model unfolded during the 1990s, it was evident for both scholars and campaigning organizations that entirely voluntary initiatives faced challenges for effectively improve working conditions, as companies and private monitoring agencies had strong incentives to be selective in the observance of labour rights (CCC-005, Barrientos and Smith 2007, Palpacuer 2008). In an attempt to respond to these shortcomings, MSIs[14] were formed jointly by private and civil society actors, aimed at providing support to companies for enforcing codes of conduct, on the basis of international standards and best practices, as well as developing autonomous strategies for monitoring their compliance (Bulut and Lane 2010).

The emergence of FWF was framed by these trends and materialized in 1999 after negotiations among business associations, trade unions and NGOs, including the CCC, in The Netherlands (Sluiter 2009). These organizations instituted an independent mechanism

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[13] See a profile or each NGO in Appendix 1.

[14] Barrientos and Smith define MSIs as a 'collaborative form of institutional arrangement through which civil society hopes to influence and strengthen corporate actions to improve employment conditions in their global production networks' (2007: 717).

for assisting companies in the implementation of a model code of conduct[15], monitoring their compliance throughout the supply chains and providing information to consumers about the process (CCC-004, FWF-003). In this sense, FWF was distanced from an activist approach and adopted operational support functions in relation to its affiliates (private firms). These different approaches of the NGOs underlie their organizational identities, as highlighted in the following statement:

> We think it is important that an MSI is a non-advocacy zone, to gain the trust of employers and employees alike, an MSI needs to be a neutral place, different from the CCC or unions. Their task is to challenge companies and point out abuses; our task is to support code implementation and remediation of violations. (Erica van Doorn, FWF director, as cited in Sluiter 2009: 237).

From this perspective, the NGOs can be seen as crystallizing two perceived needs at specific stages in the regulation of the apparel industry, that is, advocacy and support/verification (Knorringa 2010). This, in turn, shaped in different ways their organizational structures, discursive practices and strategic positions. However, as organizations are not 'finished products', their strategies are constantly evolving in response to challenges that result from the operation of the industry and their own actions on it.

3.2. The RMG industry in Bangladesh

In addition to global relations, the NGOs' environments are constituted by national and local spaces where garments are produced, which in this research are delimited to the Bangladeshi ready-made garment (RMG) industry. This business began to develop in the 1970s and expanded under the preferential conditions that the international Multi-Fibre Agreement granted to Bangladesh. Its consolidation occurred in the next decades through tax incentives and trade liberalization measures established by the central government that, together with exceptionally low labour costs, attracted massive foreign investments to the country, turning it into the second largest clothing exporter in the world (Kurpad Meenakshi 2014). Currently, the sector produces approximately 75% of total export earnings in Bangladesh and employs around 1.9 million people, out of which 80% are women and rural migrants, working in 6.000 factories that manufacture basic garments for European and North-American markets, but also increasingly for internal consumption and markets like China and India (Ahmed 2009).

The rapid expansion of the sector has been characterized by precarious labour conditions, expressed in informal employment contracts, low wages, excessive and unpaid overtime, occupational health and safety hazards, and gender discrimination (Kurpad Meenak-

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[15] The code of conduct promoted by the FWF includes eight labour standards derived from ILO conventions and the UN's Declaration on Human Rights: employment is freely chosen; no discrimination at employment; no exploitation of child labour; freedom of association and right to collective bargaining; payment of a living wage; no excessive working hours; safe and healthy working conditions, and legally binding employment relationship (FWF 2014).

shi 2014). Although in the last decade garment workers have promoted massive mobilizations to demand improved labour conditions, the degree of unionization and collective bargaining at factory and industry levels continues to be very low in the country. This situation results in part from hostile state and private attitudes towards trade unions that reflect in restrictive regulations, which is further aggravated by the powerful lobbying capacity of factory owners (Member of Bangladeshi Labour Organization 2014, personal interview)[16].

As a result, in the past decades Bangladesh has been a focus of attention of international CSOs that attempt to enhance working conditions in the industry. This interest has intensified recently due to several factory disasters that left hundreds of injured and dead workers and, particularly, with the collapse in 2013 of the Rana Plaza building that housed clothing factories producing for international companies. This triggered strong responses of foreign and national actors requiring improved regulation and monitoring of fire and building safety conditions in the sector (Anner et al. 2013). In this context, the map of international organizations attempting to intervene in the industry has become more complex and diverse.

Dutch international cooperation is part of this scenario, with the presence of at least five types of agents in Bangladesh (Ross 2014, personal interview)[17]. First, the Ministry of Foreign Affairs that funds projects on the issue and has directly supported initiatives like the training of new labour inspectors. Secondly, trade union federations, particularly FNV and CNV, which support Bangladeshi labour organizations either directly or through international union federations and alliances with NGOs. Thirdly, international NGOs that work in autonomous and joint initiatives in the sector. Fourthly, TNCs implementing their own codes of conduct and participating in MSIs. And finally, other actors as think tanks and media that produce knowledge on the industry. In this complex picture, CCC and FWF develop their strategies in Bangladesh, which demands from them a high degree of coordination with other agents and the capacity to generate actions that stand out by its distinctive contribution for improving workers' situation.

3.3. NGOs and a complex matrix of actors

As noted above, international NGOs are located at the intersection of multilayered relations among actors at local, national and global scales. These agents occupy different positions in the apparel industry and have distinct expectations on the role that NGOs should play in the governance of the sector. Since legitimacy justifications are produced in dialectical interactions with other actors' discourses, understanding those expectations is critical to qualify the analysis of NGOs discursive practices. In this sense, some relevant perceptions of three groups of agents are examined in this section: governments, CSOs and firms.

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[16] Personal interview with member of a Bangladeshi Labour Organization on the situation of workers' in the RMG industry, Amsterdam, 29 August 2014. The name has been omitted by request of the interviewee.

[17] Personal interview with W. Ross on initiatives that attempt to improve Bangladeshi workers' conditions, The Hague, 30 June 2014.

The relations between *NGOs and governments* are located at two geographic spaces. First, in the Dutch context, the organizations interact with the government mainly in the framework of official development assistance projects, in which the latter provides funding for initiatives operated by the former. However, recent changes in the orientation of the international aid policy in The Netherlands[18] have put pressures on the NGOs to diversify their funding alternatives, become more professionalized, improve their evaluation systems to show results, and strengthen their mobilization capacity in the South (Bieckmann 2012, van Lieshout et al. 2010).

Secondly, in producing countries like Bangladesh, NGOs attempt to enhance regulatory frameworks on labour rights. However, governments tend to be cautious about the intervention of international NGOs, because they consider it either an undue intromission in domestic affairs or a form of protectionism through the imposition of labour standards that poses unfair limitations to Southern countries' development, harming employment creation (Razavi 1999: 673). However, as stated by Jessop, 'given the porosity of borders… states find it increasingly hard, should they want to, to contain economic, political and social processes within their borders or to control flows across these borders' (2000: 350).

In addition, international NGOs face expectations of other *civil society actors* which, by and large, consider that the trend towards greater professionalization of NGOs detaches them from workers' struggles and confine their actions to technical interventions. They frequently demand a more politicized approach through a direct involvement with grassroots movements, strengthening solidarity and challenging power structures (Quaki 2012, Lammers 2012, Tallontire et al. 2011). In turn, those requirements are coupled with the need to coordinate and preserve an equilibrium between their activities and those of other organizations, in order to avoid duplicating efforts, overstepping the mandate of trade unions, who are supposed to represent workers, or undermining the role of CSOs in producing countries (Jordan and van Tuijl 2000, Riisgaard 2005, Williams et al. 2011).

Finally, it has been noted in the literature that intrinsic tensions exist between the perspectives of private companies and NGOs in the improvement of labour conditions, since 'corporate priority is on technical or outcome standards to achieve social compliance… (while) civil society priority is on universal or process rights as a means for workers to struggle for changes in production systems' (Barrientos and Smith 2007: 714). Despite this distinction, the expectations of *firms* on NGOs may vary depending on their stand in relation to labour standards. On the one hand, companies that are reluctant to undertake

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[18] In recent years the public consensus in The Netherlands around the desirability of Official Development Cooperation has been challenged, due to concerns over its effectiveness, the changing conditions of developing countries and the impact of the financial crisis (van Lieshout et al. 2010). In response, the Dutch government has taken policy measures that include greater focalization of the strategies, closer articulation with foreign policy goals, more stringent monitoring and evaluation, and reduction in budgetary allocations (Spitz et al. 2013).

strategies for comply with labour rights, may consider undesirable the actions of these organizations and attempt to minimize their impact by engaging in purely instrumental CSR strategies (Tallontire et al. 2011). On the other hand, willing and 'forerunner' apparel firms might expect NGOs to be partners in developing better labour practices, providing independent verification and communicating their achievements to consumers, thereby enhancing their position in the market (Knorringa 2010).

To sum up, this chapter has explored key elements that structure the environment in which CCC and FWF operate: the functioning of the global and Bangladeshi apparel industry, and diverse expectations of three categories of actors on the role of NGOs in the sector. It was argued that the environments in which the organizations are embedded, contributed to distinctly shape their organizational forms and strategic approaches, as they emerged from needs perceived at different moments of the industry's development. With this context, the following sections tackle two core dimensions of the analytical framework, that is, NGOs' interpretations of the industry and claims of legitimacy.

Chapter 4:   Making sense of labour issues in the garment industry

This chapter studies the discursive practices of the NGOs by comparing their interpretations on labour-related problems in the apparel industry and alternatives available to tackle them. Such examination is critical to understand their organizational strategies, since the ways in which they frame the sector's problems determine the courses of action at their disposal. In particular, three aspects of those interpretations are discussed in light of the theoretical debates presented before (see table 1): the nature of the garment industry, the definition of its work-related problems and the approaches to their solution. Quotations extracted from the corpus of texts gathered for this research are included to illustrate the arguments[19] and the number of repetitions of key words in the texts is presented between crotchets.

The argument advance here is that the NGOs share fairly similar interpretations on the nature of the apparel sector, as global buyer-driven supply chains, and are rooted in institutional approaches to the solution of labour issues. However, the NGOs incorporate in their discourses distinct elements arising from their strategic positions in the industry, which lead them to promote different tactics and tools for achieving their goals. Moreover, it is argued that through the production of these interpretations, the organizations lay discursive foundations for justifying their legitimacy for intervening in the sector.

4.1. Understanding the business

The first aspect of the NGOs' interpretations refers to the operation of the garment business, whose understanding is a precondition for making sense of labour issues in it. Although an explicit account of globalization processes and its drivers is absent from the analyzed texts, both organizations perceive the apparel industry as a global [CCC:48, FWF:6] and international [CCC:203, FWF:32] phenomenon, recognizing the complexity of economic and social flows involved in it. These accounts seem to carry implicit assumptions about the inevitability of globalization processes and the increasing interdependence between diverse spatialities and actors, surpassing nation-states as the fundamental scale where social relations are enacted:

> Real improvements require coordinated efforts between brands, factories, workers and other stakeholders... such coordinated efforts are necessary because the economic structures of the apparel industry – complex, internationalised supply chains - have evolved faster than legal and regulatory structures (FWF-003:-6).

The industry is often represented through the metaphor of supply chains [CCC:17, FWF:39], which depicts a sequence of market exchanges between firms at different stages of the production and distribution of garments (Castree et al.-2013). This metaphor was

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[19] The origin of the quotes is identified between brackets with the code assigned to each text, as presented in Appendix 5.

developed in the field of industrial management as the basis to increase the productivity of business models, being the target of criticisms for its linearity, exclusive focus in firms and inattention to ethical considerations (Gibbon and Ponte 2008, New 1997). However, in this context the metaphor serves to clarify the economic links between TNCs, factories in the South and workers, constituting an essential association for establishing relations of causality and responsibility in the industry.

Despite the common use of this metaphor, NGOs' representations of the sector differ in the centrality assigned to actors situated outside production processes, such as governments [CCC:97, FWF:12], consumers [CCC:39, FWF:13], multilateral agencies such as the International Labour Organization (ILO) and the United Nations (UN) [CCC:58, FWF:43] and other CSOs [CCC:53, FWF:11]. FWF focuses on the interactions between buyer firms, supplier factories and workers; while the CCC tends to consider a broader spectrum of actors, which approximates an understanding of the sector as global production networks (Barrientos et al. 2011). This divergence might originate in the nature of their functions, since advocacy tasks are associated with a wider range of interactions than activities of code of conduct's implementation and verification that are intrinsically associated the to production process.

Moreover, both organizations recognize that the interactions among firms are mediated by power differentials between buyers and suppliers, giving rise to unequal terms of exchange and developmental outcomes. This conception emphasizes the leading role of international brands and retailers in determining conditions of production (price, times, quality) aimed at saving costs and maximizing rents, and the subsequent impact in the practices of labour management in factories. 'The complex reality about modern, global garment supply chains... (Is that) clothing brands generally do not own the factories that produce their clothes... (And that) Brands' business practices directly influence labour conditions'(FWF-002: 1). Such understanding coincides with an interpretation of 'buyer-driven' chain governance (Gereffi 2013) that highlights the location of decision-making authority for coordinating the industry in the purchasing end of the chain (Barrientos et al. 2011).

From this perspective, the apparel business appears stratified at three levels. First, Northern-based *brands and retailers* acting at a global scale that move freely between suppliers and set buying conditions in order to capture the highest possible profits. Secondly, *factories* in the South, Bangladesh in this case, which adapt their production and labour policies to meet the demands of buyers in a competitive and uncertain environment. And thirdly, *workers,* who are confronted with insecure conditions in the factories and lack mechanisms for protecting their rights. From that perspective, the power to alter the dynamics of the industry is placed more centrally within the terrain of buyer companies at the global scale, whose practices flow towards national and local scales, materializing in effects on workers' wellbeing. Interestingly, the role of the state in the industry is comparatively marginal in the NGOs' discourses and mainly associated to the enforcement of labour rights with domestic firms. This logic is illustrated in the next narrative:

> In the global garment industry wages that are sufficient to cover the needs of workers are rare... The power to change this unfair wage situation lies with the large international brands and retailers, who make huge profits by selling the clothes which these underpaid workers work so hard to assemble (CCC-001: 4).

The interactions in the industry appear to reflect broader power asymmetries between the Global North and South, as TNCs are usually based in 'consuming' countries in Western Europe and North America, whereas manufacturers and workers are located at 'producer' countries of Asia and Eastern Europe[20]. These tensions, and the historical and colonial processes that underlie them, are not explicitly addressed in the texts. This omission may have the unintended effect of naturalizing in their discourses the international division of labour in the industry, without challenging structural patterns of inequality that originated them (Ghafele 2004: 442).

In sum, the NGOs exhibit similar interpretations of the garment industry as a globalized sector formed of supply chains that are largely governed by buyer companies. This means that western-based TNCs have the authority to shape conditions of production in factories from which they source and, thus, have an impact in workers' wellbeing. In spite of sharing this vision, CCC is inclined to incorporate in its discourse a wider network of actors participating in the business, while FWF tends to focus in agents endogenous to the production processes, which can be interpreted as originating in their distinct organizational functions.

4.2. Defining the problems

On the basis of those interpretations, the NGOs define the nature and causes of work-related problems in the industry, shedding light on particular dimensions of the phenomenon. The examined texts stress how purchasing practices of TNCs guided exclusively by the logic of cost-saving and profit-maximization, affect negatively the conditions under which factories produce and lead to poor working conditions at the bottom of the supply chains. This process is understood by the organizations as derived from the failure of two coordination mechanisms in the industry.

On the one hand, the failure of price alone to organize market exchanges and lead to an optimal allocation of resources from a societal perspective, as well as the inability of private actors to self-regulate to correct these failures, for example through CSR activities. On the other hand, the failure of states to institute and enforce regulations that protect workers' rights, which is further aggravated by the limited enforceability of international instruments. As stated by the CCC, 'the exploitation and abuses of workers in international supply chains... are a consequence of both the failure of governments to protect their citizens'

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[20] The differentiation between producing and consumer countries seems to be exclusive and fixed; however, China and India challenge this perception, as traditional garment manufacturers that have been moving upwards the value chain and strengthening their role as consumers (Guarin and Knorringa 2014, Knorringa 2010).

labour rights and the extent to which business organisations avoid their respective responsibilities toward their employees' (CCC-005: 3).

This interpretation is consistent with an institutional approach (see table 1) to labour problems, where the imperfect functioning of the labour market together with lack of appropriate regulation by public agencies, result in the violation of workers' rights (Palpacuer 2008; Razavi 1999). In this sense, both NGOs look at the problems of workers in the industry through the lenses of a set of principles enshrined in declarations of the ILO and the UN. These principles comprise both outcome rights, like the ban of child labour and living wages, and process rights, as freedom of association and collective bargaining (Barrientos and Smith 2007). The lack of guarantee of those rights is seen as endemic, given the complex networks of subcontracting that characterize the garment business, which means that 'there's no such thing as '100% fair' clothing – yet' (FWF-002: 1).

Interestingly, none of the organizations employs the notion of precarious work to characterize workers' situation, despite its centrality in the discourse of the ILO, nor do they allude to the absence of social protection policies [CCC:2, FWF:0], as the basis of workers' vulnerability [CCC:3, FWF:1]. The NGOs underline the gendered nature of the industry (particularly in relation to discriminatory practices) and to some extent also recognize particular challenges faced by migrants and members of 'lower' castes. Nonetheless, other issues are only marginally addressed in the texts, such as the links between labour problems and the reproductive sphere, and the prevalence of the informal economy [CCC:4, FWF:4] in the industry (Chen 2007). Similarly, notions of community development and livelihoods that go beyond the scope of individual rights and the productive character of work are largely absent from their discourses (Carswell, G. and G. De Neve 2013, Pegler 2011).

In spite of these commonalities, the organizations show discrepancies in their approaches to labour principles. The CCC employs more frequently the expression 'labour rights' [CCC:32, FWF:5], is more likely to highlight freedom of association [CCC:37, FWF:10] and collective bargaining [CCC:18, FWF:8] principles, and uses active verbal forms that indicate firms' agency in the violation of workers' rights [CCC:15, FWF:1]. Whereas FWF utilizes more frequently the expression 'labour standards' [CCC:13, FWF:38] and tends to employ vocabulary that denotes a constructive character, like social dialogue[21] [CCC:1, FWF:19]. According to a staff member of FWF, these affirmative expressions are used as euphemisms to avoid tensions between stakeholders: 'if you say explicitly collective bargaining agreement and trade unions, the factories are going to close ears because, especially in Bangladesh, the relationship between the investors, the employers and the workers is still very tense' (Li 2014, personal interview)[22].

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[21] The practice of social dialogue is rooted in the approach of the European Union and the ILO to industrial relations, emphasizing the need to solve work-related problems through cooperation (Kelly 2001).

[22] Personal interview with J. Li on FWF's strategies in Bangladesh, The Hague, 04 August 2014.

These differences can be related to the distinct audiences to which the texts are intended and to different expectations of the organizations' members. Given that FWF's documents tend to be addressed to its affiliated companies, it is usually assumed that firms are willing to improve the working conditions in their supply chains, either by their own initiative or by pressure from campaigning NGOs. As stated in one the organization's texts: 'no company can afford to ignore sexual harassment because of the negative effects on the workforce and the potential reputational damage' (FWF-201: 15). Consequently, labour problems are framed in terms of lack of mechanisms to secure cooperation among actors in the industry. The absence of cooperation is identified at two levels. First, in the relations between buyer companies and suppliers, which are presented as highly volatile and based on distrust, hindering agreements for securing compliance with labour standards. Secondly, in the interactions of factory managers and workers, which are characterized as conflictive, leading to frustration and low productivity.

Alternatively, CCC's texts are typically intended for the general public and CSOs in their networks, which allow for a more confrontational approach that recognizes labour exploitation and injustice:

> Over 3 million workers, the majority of whom are young women, are employed in the Bangladesh garment industry... The lack of alternative employment options combined with widespread poverty mean these women are forced to accept jobs that are poorly paid and carried out in workplaces that fail to adhere to the most basic standards health and safety (CCC-201: 2).

The use of terms that depict antagonistic relations between firms and workers such as abuse [CCC:26, FWF:13] and exploitation [CCC:14, FWF:2], as well as the concrete identification of companies that fail to guarantee labour rights, signals its distance from the private sector and its activist [CCC:18, FWF:0] character. Furthermore, the problems are posited in somewhat political terms, by acknowledging the reluctance of companies to regulate their own behaviour in view of the relative lack of power of Southern workers to advance their demands. This, in turn, calls for the development of solidarity relations in the realm of civil society that put pressure on TNCs and governments to guarantee labour right's compliance.

These different discourses seem to coincide with the argument advanced by Barrientos and Smith (2007), according to which, perspectives that are closer to the corporate sphere (like FWF, whose members are private companies) tend to centre on the compliance with existing outcome standards, while civil society approaches (as the CCC, whose coalition is made of diverse CSOs) are likely to prioritize process rights that set the bases for worker-driven transformations. These distinct understandings are shaped to some extent by the configuration of actors in the environment of the two organizations, which direct their attention towards different dimensions of the problems.

Furthermore, NGOs' explanations of labour problems in the industry can be seen as producing discursively a space for their own intervention in two dimensions. First, they bridge the gap among actors located at global (TNCs, consumers), national (governments)

and local scales (factories, workers, local CSOs) (Scholte 2011). Secondly, they contribute to overcome the failure of market and state regulation, by providing additional mechanisms for improving labour outcomes in the sector. That twofold condition is exemplified by the narrative of the CCC on their international solidarity strategies: 'workers seek to defend their rights locally… but sometimes they request support at the international level, to help to press the brand name companies and retailers that source internationally to take responsibility for their role in determining working conditions' (CCC-101: 3).

4.3. Identifying solutions

It was argued that CCC and FWF share an institutional perspective on the nature of labour issues that emphasizes how the practices of international buyers exclusively aimed at maximizing profits affect negatively labour rights' compliance down the supply chains. From this problem definition, the NGOs attempt to transform the business model under which the industry operates, seeking to re-embed it in ethical considerations that surpass the logic of price competition (Polanyi 2001). In this sense, the *rationale*[23] promoted by the organizations is strongly value-oriented and rooted in a 'stakeholder perspective' of business ethics. This perspective entails that companies should contribute to improve social well-being by adopting forms of value redistribution to a broader range of actors than their owners, challenging the focus on shareholder value (Gibbon and Ponte 2008; Moriarty 2008; Palpacuer 2008).

> Clothing brands generally do not own the factories that produce their clothes. Yet the fact that they buy their products from these factories means they have a responsibility towards the factory's employees. This supply chain responsibility requires companies to make sourcing decisions that ensure good working conditions (FWF 002: 1).

As the previous quote illustrates, TNCs' responsibility [CCC: 42, FWF:21] for workers' welfare is a fundamental idea in the discourses of the NGOs, allowing them to demand new forms of regulation. Such responsibility goes beyond traditional legal liability based on the employment contract to encompass *sui generis* moral and economic obligations. This obligations find support in the 'UN Framework for Business and Human Rights' [CCC:5, FWF:5] that poses on private firms the duty to respect workers' rights and remedy its violations (UN 2011). There are three types of regulatory mechanisms through which that responsibility is realized. First, nongovernmental self-regulatory mechanisms, such as codes of conduct [CCC:28, FWF:98] and CSR initiatives. Secondly, nongovernmental binding arrangements, like multi-stakeholder monitoring strategies and compensation schemes set up in cases of factory disasters in Bangladesh. Lastly, governmental and intergovernmental regulations that comprise public policies, laws and conventions.

Although both organizations tend to see these three types of mechanisms as complementary, their strategies are mostly directed at promoting nongovernmental forms of regu-

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[23] Rationales, tactics and tools are the three components of the 'orders of government' through which GVC governmentality is analyzed, see page 12.

lation. Indeed, despite recognizing the role of the state in protecting labour rights at the national level, and identifying its failures as one cause of poor labour conditions, their strategies are usually targeted at TNCs and employers, rather than public agencies. However, their approaches to these regulatory mechanisms vary. FWF focuses in the gradual implementation of codes of conduct and independent verification at the level of factories and TNCs, which subject voluntarily to these norms by becoming members of the organization. While CCC encourages industry-wide arrangements that establish enforceable commitments for firms, like in the case of the 'Accord for Fire and Building Safety in Bangladesh' (CCC-202). These nuances reflect different emphases on the participants of the production process versus broader networks of agents, and assumptions on the likelihood of companies to voluntarily subject to new regulation.

The contrast between the cooperative perspective of FWF and a rather confrontational discourse of CCC, strongly influences their definition of the means – *tactics* and *tools* - employed to enhance the regulation of the business. Indeed, FWF tends to privilege *tactics* that generate cooperation [CCC:12, FWF:32] between actors at two levels of the supply chains. First, between TNCs and factories they source from, through the establishment of long-term relations that provide greater 'leverage' for the former to demand compliance with their code of conduct, while reducing the uncertainty of the latter and motivating investments in improving workers' conditions. This coincides with a tactic of partnering between buyers and suppliers that, according to Gibbon and Ponte (2009), has been a central prescription of the 'supply management' discipline and practice since the late 1980s, but is used in this context to ensure observance of labour standards.

The second level of cooperation is established in the interaction between factory managers and workers, in which the central strategy consists in strengthening social dialogue mechanisms to solve conflicts on the work floor in a concerted manner, under the assumption that win-win alternatives for all parties can be achieved (Kelly 2011). However, this assumption is taken carefully by FWF in the Bangladeshi context, acknowledging the imbalances in bargaining power of employers and workers, which requires putting in place additional measures. These tactics are supported by a set of *tools* created by the organization, which constitute the 'Fair Wear Formula'. The formula consists of management requirements for TNCs, human resource management instruments for factories, multi-level verification of labour standards, workers' complaints procedure, workplace education programmes, and information and remediation systems.

Meanwhile, since CCC tends to see companies as reluctant to comply with meaningful labour regulations, its *tactics* are mostly directed at strengthening relations of solidarity [CCC:28, FWF:0] among civil society actors at different scales to build a critical mass for demanding actions from them. Solidarity practices are associated historically with the international trade union movement, and have been linked recently with the emergence of 'social movement unionism', by which civil society groups form inter-class and global-local alliances for advancing labour- rights (Featherstone 2012, Waterman 2001). In CCC's dis-

course, solidarity is used to describe the community[24] of interests and actions among the organizations that form their coalitions and networks, seeking to 'simultaneously push all those responsible for improving workplace conditions' (CCC-101: 4).

Relations of solidarity are promoted between civil society actors located at consumer and producer sites of the global apparel business, linking the demands of workers in the local sphere with global decision-making spaces by employing the power of consumers to put pressure on clothing brands and retailers. The *tools* produced to realize this tactic include, first, the urgent appeals system, which allows workers to ask for international support when their rights are at risk or have been violated. Secondly, the advocacy actions and campaigns that target TNCs, factory owners and governments. Thirdly, the training and support of workers' organizations in the South. Fourthly, the production of knowledge through research activities. Lastly, the creation of technical instruments to guide companies' actions, such as the 'Full package approach to Labour Codes of Conduct'.

In sum, the organizations share a similar rationale for the solution of work problems in the apparel industry, which aims at re-embedding the operation of the business in ethical considerations about the impact of TNCs practices on the well-being of workers, weaving discursively a responsibility relation among them. Nonetheless, the singular definition of the issues by each NGO, gives rise to differentiated tactics and tools for realizing the goal of improved regulation of the sector. This divergence can be interpreted as complementary or conflictive. On the one hand, the campaigning action of the CCC can push companies to improve labour conditions in their supply chains and, thus, seek support from the FWF to achieve it in a credible way. On the other hand, FWF's focus on compliance with existing labour standards, and particularly outcome standards, could be seen as providing companies a protection against campaigning organizations like the CCC that aim at extending the reach of labour rights. These potential synergies and tensions are analyzed in the final chapter of the paper.

Moreover, in producing their discourses, the organizations identify a niche of unmet needs in the link between global, national and local scales, and in overcoming the limitations of pure private and public regulation, setting the bases for their own intervention in the governance of the industry. These functions resemble what Jessop terms a strategic restructuring of scales and functional relations in globalization processes. Such restructuring is characterized by actors' attempts to 'promote global coordination of activities in… different functional subsystems' (2000: 340), leading to a 'proliferation of discursively constituted and institutionally materialized and embedded spatial scales (whether terrestrial, territorial or telematic)' (2000: 343). In the case of CCC and FWF, the stratified character assigned to the apparel business requires the construction of new scales and relations that

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[24] In spite of the sense of community embodied in the notion of solidarity, it may mask also profound inequalities among actors, since they are bearers of pre-existent asymmetrical power relations that may be reproduced or reconfigured in their interactions (Featherstone 2012).

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connect problems arising in local contexts to solutions in the global sphere. Thus, NGOs contribute to build these scales and relations through the tactics and tools presented above.

To conclude, this chapter has addressed the second dimension of the analytical framework of NGO legitimacy justification, by examining how CCC and FWF understand the global garment business, its labour problems and the alternatives to address them. However, in order to be able to participate in the regulation of labour, NGOs are required to provide justifications on the appropriateness and desirability of their organizational forms and practices, which implies turning now to study the legitimacy claims incorporated in their discourses.

Chapter 5: NGOs claiming legitimacy

The previous chapter suggested that CCC and FWF promote a rationale of supply chain responsibility to secure respect of labour rights, which competes with a prevailing logic of profit maximization through cost saving. Mainstreaming such rationale into the industry's practices entails efforts by the NGOs to demonstrate the advantages of the new model and justify their own legitimacy to take part in it. In the absence of 'formal authority' for intervening in the sector's regulation, the organizations incorporate in their texts claims of legitimacy which reflect critical resources that make them 'suitable' for participating in it. These claims are central in the organizational discourses since, as stated by Hardy and Phillips, 'organizations require sufficient power to demonstrate that they have a "legitimate" right to participate' (1998: 220).

In the case of CCC and FWF, legitimacy claims can be grouped around three analytical categories, which coincide with clusters of criticisms faced by international NGOs[25]: associative capacity (associability), performance and credibility. Such claims provide justifications about the nature of the organizations, their actions and the relations that they establish with other actors (Hudson 2001). Although both organizations make assertions along these lines, claims vary in response to their distinct audiences, tactics and tools for improving labour conditions in the industry. This chapter examines similarities and differences of key legitimacy claims found in the organizational texts.

5.1. Associability: representation, membership and partnerships

The first set of legitimacy claims are related to the NGOs' forms of organizing and their ability to undertake associative endeavours through networks and partnerships to promote labour rights (Malunga 2010). These assertions attempt to demonstrate that their practices are rooted in rightful interests of stakeholders in the sector, as well as their ability to translate them into concrete actions. Traditionally, such functions have been associated with elected representatives in democratic political systems at the national scale. However, the absence of democratic governing bodies in the global garment industry opens up the possibility of non-territorial, non-state forms of political power to regulate it (Jessop 2000). This creates a space for claims of non-elective political representation by NGOs, since 'unelected representatives… (they) are not spatially challenged by the border of nations, but can claim to speak for interests (or would-be constituencies) that span different countries with a greater freedom than elected actors can' (Saward 2009: 8).

Consequently, legitimacy claims of these organizations can be best understood in the context of non-formal authorisation mechanisms[26], given their self-appointed and value-driven character that distinguishes them from elected bodies that represent the interest of

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[25] See page 11.

[26] For a discussion on the non-elective character of NGOs see Dryzek and Niemeyer 2008, Maia 2012, Peruzzoti 2006, Saward 2009.

their members, like trade unions and business associations (Peruzzoti 2006). This is corroborated by the absence of allusions to direct representation of constituencies in the NGOs' texts, which may be explained by the lack of democratic electoral processes from which a mandate of representation could be formally derived. These characteristics, lead the organizations to invoke other types of associative relations to support their legitimacy (Kovach 2006; Lammers 2012). However, as the functions and tactics of the NGOs differ, their claims also vary to a significant extent.

The CCC identifies itself as a coalition of civil society organizations, which respond to a variety of constituencies in the North, such as workers, women and consumers. In spite of avoiding references to direct representation, the NGO asserts its commitment to the defence of workers' interests in the apparel industry: 'The workers and worker-organisers present at the forum reinforced the CCC's practice of working closely with those on the factory work floor, and to ensure that our campaigning is guided by the needs of the garments workers' (CCC-003:5). Such commitment is reflected in their proximity to workers through a network of partner organizations in producer countries and in the similarity of their struggles. These characteristics are crucial for sustaining solidarity tactics between the CCC, its European coalition and southern partners (Saward 2009).

Interestingly, a member of the Dutch CCC describes the relation between the organization and garment workers in these terms: 'in Europe we are the voice of the workers, we communicate the voice of the workers towards companies, towards the public, towards the government' (de Bruin 2014, personal interview)[27]. The metaphor of CCC as the 'voice of workers' is employed also in other organizational texts in reference to solidarity actions (CCC-101, CCC-102), symbolizing a mediation by the NGO that allows to transmit local demands of workers to global decision-making spaces of the industry (Houtzager and Gurza Lavalle 2010). This reflects what Saward terms a 'mirroring claim' in which the organization asserts that it listens to and echoes the voice of workers, instead of speaking for them (2009: 13).

Moreover, CCC affirms that its work is anchored in explicit demands by workers and is developed in a continuous process of negotiation with them: 'The CCC believes that garment workers should be the ones to decide if they want international support in specific cases where their rights have been violated' (CCC-102:6). This entails the recognition of workers' agency to make decisions over strategies for improving their own position in the industry, with CCC's support as one of the available alternatives (Cumbers et al. 2008). However, the use of the partner figure in the organizational discourse raises two concerns. First, the seemingly un-problematized perception of labour organizations in producing countries as suitable representatives of workers' interests and partners. Secondly, the depiction of a horizontal relation between Northern and Southern organizations that may overlook power imbalances and even hierarchies between them. As noted by Jordan and van Tuijl, 'the relationships that emerge among NGOs engaged in global campaigns are highly

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[27] Personal interview with C. de Bruin on CCC's strategies in Bangladesh, The Hague, 21 July 2014.

problematic… if not handled with care, they may reflect as much inequality as they are try-ing to undo' (2000: 2061).

Alternatively, FWF claims to be governed by three collective actors (business associations, trade unions and NGOs) that represent relevant European stakeholders in the apparel industry. This character is captured in the organic metaphor 'Multi-stakeholder DNA' (FWF-003, FWF-004), which signals a symbiotic relation among the three types of actors that give rise to FWF. Unlike the explicit commitment of the CCC to the representation of workers' interests, FWF claims to be a neutral space where interests of different groups are negotiated. In other words, the organization is discursively constituted as a locus of representation and its strategies crystallize arrangements achieved by the participants.

Such an assertion is central for the cooperation tactic advanced by the NGO, which requires gaining the trust of all the actors to push their efforts in the same direction (Fuchs et al. 2009). In this sense, the institutionalization of equal representation of the three stakeholders in FWF's governing bodies and funding sources occupies a fundamental place in their justification of legitimacy. As noted by one of its staff members, 'we are a balanced organization, you can see from our funding, you can also see from our board... we improve working conditions both for the employers and the workers' (Li 2014, personal interview).

The ability to balance interests may constitute an advantage for companies affiliated to the organization, because it ensures that the improvements expected from them would be within the confines of what is acceptable and achievable from the perspective of the private sector. A member of FWF affirms: 'we have all of them in our board and, of course, that's the nature of the organizations itself… activists should push brands and brands can tell activists 'what you are asking there might be not realistic but we can do it in this way' and that is how people come together' (Karl 2014, personal interview)[28]. This provides also trade unions and NGOs with an institutionalized space for dialogue with firms by which new issues can be introduced in the corporate agenda. Yet, the negotiated character of these arrangements can also be interpreted as hampering deeper transformations, if private actors lean towards more moderate advances (Barrientos and Smith 2007).

In addition, FWF stresses its proximity with producing countries through stakeholder platforms and networks of partners, designated 'FWF suppliers' in a parallel with the notion of supply chains, which provide information on local realities and operate joint strategies at the local level. The organization operates also a 'complaints procedure' that allows workers of factories supplying its affiliates to communicate with the NGO to ask for information, seek redress or report problems in the implementation of the activities. Yet FWF recognizes in its texts the limited participation of Southern actors in decision-making processes of the organization, and claims to be working on strategies for 'further adapting existing decision-making structures... to ensure representation of stakeholders in various European and production countries' (FWF-004: 8).

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[28] Personal interview with S. Karl on FWF's strategies, The Hague, 07 August 2014.

In sum, associability claims made by the organizations appear to go beyond traditional notions of democratic representation in national spaces, giving way to alternative associational practices that justify NGOs' appropriateness for participating in the governance of the garment industry. In turn, these practices are related to particular tactics promoted by the organizations to institute a rationale of responsibility in the operation of the business. The CCC asserts its commitment with Southern workers' struggles and positions itself as a channel for transmitting their demands to global spaces of decision-making through solidarity actions. In contrast, FWF stresses its neutral character as a space for the negotiation of diverse interests of actors in the industry, thereby allowing the emergence of cooperative relations among them.

5.2. Organizational performance

Beyond their forms of organizing, the NGOs are required to demonstrate the actual results of their actions for the achievement of expected outcomes and objectives (Fowler 1996). This requirement has been identified as 'output legitimacy' and refers broadly, in the case of initiatives attempting to improve working conditions, to their 'effectiveness in establishing and implementing labour standards/rights in a durable and reasonably comprehensive manner' (Bulut and Lane 2010: 58). Moreover, NGOs have been subjected in recent years to pressures by funders, scholars and other actors in their environments to show the impact[29], scalability and sustainability of their interventions. In this context, claims of effectiveness are placed at the centre of their efforts to take part in the regulation of the garment sector (Lipschutz 2003, Utting 2005).

The organizations are faced with demands not only to improve the outcomes of their interventions, but also to develop ways for adequately quantifying and reporting them, which in turn entails greater professionalization and control over their internal processes. These requirements are reflected in the abundant production[30] of reports on their activities, both at the level of the organization and specific interventions. These texts tend to highlight the accomplishments [CCC:31, FWF:6] of the NGOs in advancing towards more responsible behaviour in the clothing industry, frequently on the basis of self-assessments and internal evaluations with their members. Those assertions are usually tempered by the recognition of the persistent widespread violation of labour rights in the industry, as illustrated by the following narratives:

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[29] A widely accepted definition of NGO performance has been elusive in the literature given the difficulty of measuring the developmental impacts of these organizations in view of the high complexity and non-linearity of the problems they tackle, among other factors. See Fowler 1996, Edwards and Hulme 2002, Roche and Kelly 2005.

[30] For example, ten of the texts used for this research are grouped under the genre of reports, see Appendix 5.

> While there is no such thing as 100% fair clothing (yet), FWF's members are working to make real improvements, today and over the long term… FWF members are demonstrating that change for the better is possible (FWF-003: 2).

> Through the combination of exposing exploitation, opposing the limitation of workers to exercise their rights, and proposing effective and feasible ways forward towards a solution, SKC/CCC has been and continue to be, an instrumental actor in the process of empowering workers and improving working conditions -and the lives- of millions of the mostly women garment workers in the world (CCC 2014).

Claims of effectiveness are nuanced by the particular roles of the organizations. As an advocacy NGO, CCC emphasizes its achievements in raising awareness among Northern consumers to put pressure on companies to enforce responsible business practices, while empowering workers to voice their demands and struggle for their rights at the local level. FWF, as a support organization, underlines advances in labour standards' compliance in their affiliates' supply chains through the development of better information systems, verification tools, training programmes and workers' help lines. The focus in the first case is placed on the collaborative work of networks and coalitions as a key element of effective advocacy (Roche and Kelly 2005), while in the second is located in the production of technical instruments that help to build actors' capacity to self-regulate.

In spite of these differences, common claims of expertise [CCC:24, FWF:19] and professionalism [CCC:5, FWF:5] can be identified in NGOs' discourses, underpinned by their experience, specialization and technical capacity (Ebrahim 2003). Such characteristics seem to endow the organizations with authority to, first, produce standardized guidelines for action aimed at improving working conditions, such as the 'Fair Wear Formula' and the 'Full Package Approach to labour codes of conduct' of CCC. Secondly, they judge the appropriateness of efforts made by private companies to improve working conditions, through technologies designed to verify, measure and evaluate their advances. This expert role is realized in the production of tools that include managerial techniques, manuals, training materials and verification methodologies, which contribute to implant a responsibility rationale in the sector (Gibbon and Ponte 2008).

In addition, the examined texts reflect mounting concerns by the organizations with demonstrating effectiveness [CCC:28;FWF:24] and sustainability [CCC:18, FWF:7], through organizational evaluations [CCC:6, FWF:30] and learning [CCC:11, FWF:11]. This is exemplified by a statement about the future of the CCC:

> In the past few years CCC has been working on a new structure for the CCC network. It was felt that after 20 years of activity it was time to take a step back while simultaneously looking forward… How can we be accountable in our decision-making and improve our efficiency and flexibility?…. How do we ensure the CCC Network is able to translate collective strategies and plans into concrete results and achievements? (CCC-002:15).

There is also an urgency to develop mechanisms for quantifying the advances made by enterprises in the compliance with labour standards, which is specially marked in FWF's discourse (FWF-003, FWF-004), probably due to its affiliates' demands and to criticisms of MSIs' impact (Bulut and Lane 2010). Such pressures can be interpreted as stemming from a

'managerialist'[31] paradigm that translates central values of the corporate world, such as efficiency and effectiveness, to the sphere of civil society (Roberts et al. 2005). This emphasis on measurement and efficiency led to criticisms, for reducing NGOs' actions to technical interventions, hindering innovation and removing them from the realm of political struggles. 'Because of their continued financial dependence on institutional donors, NGOs tend to accept these performance measures while simultaneously trying to have a deeper-level impact on power relations and social exclusion' (Edwards 1999:260).

All in all, claims of legitimacy based on performance tend to stress NGOs' advances in promoting compliance with labour standards in the industry, although their foci vary according to their different approaches. CCC highlights worker empowerment and increased pressure over companies, while FWF underlines capacity building in supply chains through the development of technical instruments. Moreover, these claims evidence the organization's expert character, which enables them to produce and circulate knowledge and tools in an attempt to regulate the behaviour of actors in the garment sector (Gibbon and Ponte 2008).

5.3. Credibility and reputation

> For the nonprofit, reputation is close to being everything. And reputation is closely tied to visibility. Your reputation is enhanced not just by the good work you do, but by the recognition you get for doing it (Austin 2000: 77).

The previous excerpt points to the significance of a third cluster of legitimacy claims, based in credibility and reputation, for NGOs' attempts to participate in labour regulation. This credibility derives from a positive recognition of their practices by actors in their networks and broader audiences, which is commonly anchored in their value-based character and perceived effectiveness in tackling problems in the industry. According to Ebrahim, reputation entails 'not only general perceptions of an organization's standing and credibility, but also the power derived from this standing'(2003: 73). Hence, organizational reputation and credibility constitute critical resources that allow NGOs to exert influence over other agents in the sector (Hardy and Phillips 1998).

The examination of the NGOs' texts reveals frequent references to the positive assessment of their work by other actors, which are primarily linked to their experience, expertise and effectiveness. For example, CCC asserts that 'over the years SKC/CCC has grown in stature and its expertise and motivation are respected by consumers, companies, governments and partners alike' (CCC-001: 17), while FWF states that 'for almost 15 years, FWF has brought together the expertise of trade unions, non-governmental organisations

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[31]According to Roberts et al., managerialism refers to 'the bundles of knowledges and practices associated with formalized organizational management –a central feature of contemporary NGO networks' (2005:1846). Klikauer suggest that 'Managerialism justifies the application of managerial techniques to all areas of society on the grounds of superior ideology (and) expert training' (2013: 2).

(NGO's) and business associations to achieve real improvements in the clothing industry' (FWF-004: 5). Their credibility tends to be closely associated with their claims of performance and their ability to persuade diverse audiences about the validity of such claims, which requires continuous efforts from the NGOs for enhancing their external communications[32].

The adherence of the organizations to moral values serves also to assert their credibility on the grounds of their identity as civil society groups, setting them apart from agents that pursue private interests. According to Edwards, 'the assumption that NGOs are values-based organizations is often used to demonstrate their comparative advantage in some areas of development work, in contrast with governments and businesses' (1999: 258). This character is evident in the adjectives 'fair' and 'clean' that are incorporated in their names and form an essential part of their identity. These adjectives imply a negative connotation about the current state of the clothing industry, as 'dirty' or 'unfair', while simultaneously exalting their commitment to ethical and social justice principles[33]. Even so, there are distinctions between the approaches of the NGOs that lead them to emphasize different values: solidarity and commitment in the case of CCC, and cooperation and neutrality in the case of FWF.

The positive reputation of the organizations amongst their networks and 'the public', endows them with a critical resource for influencing the governance of the industry. Indeed, NGOs use their credibility to affect the reputation of private firms and other agents, in order to achieve their goals. In this sense, Fombrun asserts that 'companies are increasingly often asked to demonstrate that their actions and policies meet various predetermined social and ethical criteria... doing so can help build reputation; failing to do so can be a source of reputational risk' (2005: 7). NGOs are central in managing this reputational risk, as the information that they produce can potentially damage or enhance the image of firms among consumers.

Claims by CCC and FWF of their ability to inform and influence public opinion, particularly consumers in the North, are largely present in the analyzed texts. These claims are realized through discursive genres as brochures, press releases and reports aimed at informing the public about working conditions in the industry, in order to affect their consumer behaviour. The use that the CCC and FWF make of this influence differs according to their advocacy and operational functions, and their solidarity and cooperative tactics.

For the CCC, the capacity to affect the reputation of a company is associated with its leverage in negotiating improvements in workers' conditions in the industry. In this sense,

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[32] This is reflected in the annual reports of CCC (CCC-001, CCC-002) and FWF (FWF-003), which contain specific information on the achievements of the organizations in terms of outreach through social and mass media. In addition, the organizations produce numerous public reports. FWF has designed a 'Communications Policy' that establishes norms on the use of their name and logo by their affiliates (FWF-003).

[33] See in appendix 1 the guiding principles of the organizations.

the NGO uses strategies of 'naming-and-shaming' to mobilize consumers and put pressure on companies that do not comply with labour standards or that are not willing to participate in arrangements to guarantee workers' rights. As stated in one of the organization's texts, 'in cases where companies acted inadequately, the CCC launched public campaigns to inform consumers and pressure companies to take necessary action' (CCC-002: 15).

Conversely, FWF develops communication activities and materials aimed at persuading the public about the credibility of its 'basic claim', which is 'that its affiliates are making sufficient efforts and are achieving sufficient results towards improving labour conditions in the facilities where their goods are being produced' (FWF-001: 24). In this sense, the identification of companies as members of FWF is supposed to grant them an improved status not only in the eyes of consumers, but also of campaigning organizations like the CCC. As one of FWF's members recognized, 'these brands are looking for a sort of image protection, reputation protection, so they feel that if they are part of Fair Wear and they do what we require them to do, then they will be protected so organizations like the CCC won't easily campaign against them' (Li 2014, personal interview).

This could create a contradiction between the objectives of the two organizations, if the improved image that companies get from their membership to FWF, hinders advocacy efforts for extending labour rights beyond this organization's model code of conduct. Fombrum notes that 'the more widely accepted the label or standard, the more the company can claim legitimacy in complying with prevailing 'best practice'… the more useful the standard, therefore, the better it is at… reducing a company's exposure to reputation risk from NGO activists' (2005: 7). Such potential conflict between their strategies is, however, not explicitly addressed in the organizations' discourse. Instead, references in CCC and FWF's texts tend to recognize the value of each other's work and assert the complementarity of their roles, suggesting they both belong to an 'inter-organizational community':

> The Clean Clothes Campaign forced a considerable number of – up to then quite negligent - global brands and department stores to undersign an Accord to improve Fire and Building Safety in Bangladesh (FWF-004: 4).

> The CCC regularly gives input to the main multi-stakeholder initiatives (for example… the Fair Wear Foundation and Ethical Trading Initiative in Europe) that work with companies on the implementation of good labor standards at their supply factories (CCC-101: 5).

In sum, claims of legitimacy based on NGOs' credibility and reputation appear to be primarily associated with the positive recognition by other actors on their performance and value-based character. This credibility allows them to influence 'the public' by mobilizing their consumer power, in order to put pressure on apparel companies to regulate their behaviour and secure labour rights' respect. However, the use that each organization make of this influence varies, since the CCC employs brands reputation as a leverage to gain negotiation power, while FWF presents it as a positive incentive for its affiliates to comply with labour standards. This divergence has the potential to create conflict between their strategies, if companies employ their affiliation to FWF to justify a lack of responsiveness to advocacy campaigns.

This chapter has identified and compared legitimacy claims of the CCC and FWF - the third dimension of the analytical framework for the study of NGO legitimacy justification. These claims constitute rhetoric strategies embedded in the organizational discourses that attempt not only to demonstrate their appropriateness to participate in the regulation of the industry, but also reveal critical resources at their disposal that allow them to exert influence in the sector. Three common categories of claims were extracted from the analyzed texts. First, their associative capacity, related to the organizations' ability to undertake collective endeavors, establish networks and partnerships. Secondly, their positive performance, linked to an expert character that leads them to produce technical knowledge and tools. Lastly, their credibility gives them the ability to influence companies by informing and mobilizing consumers. Points of divergence in the claims of the organizations were also indicated, constituting possible sources of contradiction in the development of their tactics and achievement of their goals. The final chapter puts forward an interpretation of the implications of these claims for the governance of the apparel industry and explores tensions that may arise in it.

Chapter 6: Concluding remarks: NGOs, governmentality and global governance

This paper has constructed and applied an analytical framework (see figure 1) for exploring how two international NGOs (CCC and FWF) justify their legitimacy to participate in the regulation of labour in the global garment industry. It has been argued that they do so, by identifying spaces for their intervention in the sector, on the basis of particular interpretations about its labour-related problems and solutions available to address them. In turn, these interventions are supported by distinct claims on the organizations' associative capacity, performance and credibility, which endow them with critical resources to exert influence in the industry. Moreover, the comparison of their discourses indicated that their legitimacy justifications are shaped by differences in their environments and strategic positions. This final chapter turns to study possible implications of these organizational discourses for the governance of the apparel industry and their broader environments, employing the notions of Global Value Chain governmentality (Gibbon and Ponte 2008) and strategic restructuring of scales (Jessop 2000).

6.1. Governmentality in the global garment industry

From the perspective of governmentality, governance in GVC is considered to arise from expert discourses that constitute 'programmes of government', which define paradigms of the appropriate roles and capacities of economic actors. These programmes are embodied in rationales, tactics and tools[34] that serve to achieve conformity to those roles throughout the chains. NGOs can be seen as one of the agents producing and circulating expert discourses about the proper behaviour of actors in the garment industry. In the case of CCC and FWF, their discourses appear to promote a rationale that aims at establishing responsibility relations between TNCs, factories and workers, in order to secure compliance with labour rights. Through this rationale, the organizations attempt to counteract a dominant supply chain management paradigm of shareholder revenue maximization through cost-saving, which is at the roots of poor working conditions in the sector (Gibbon and Ponte 2008, Palpacuer 2008).

Conformity to this rationale is sought by the NGOs through the production of various sets of tactics (cooperation and solidarity) and tools (e.g. codes of conduct, verification techniques and training). In order to operate these technologies, the organizations employ distinct configurations of critical resources at their disposal, associated with their claims of legitimacy (associability, performance and credibility). In this sense, it can be argued that, in the process of justifying their legitimacy, the organizations bring into being a particular programme of government for apparel GVCs, which attempts at re-shaping interactions among actors by challenging the hegemonic paradigm of supply chain management (Gibbon and Ponte 2008).

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[34] See page 13.

However, the analysis suggested also that the tactics, tools and claims of legitimacy employed by the organizations differ to a significant extent. Certainly, FWF promotes cooperation among agents in the sector (firms, factories and workers), on the basis of trust, dialogue and building their capacity to self-regulate. Whereas CCC directs its actions at strengthening solidarity ties in the realm of civil society, in order to put pressure on companies to accept binding arrangements. Such differences derive from the advocacy functions of the CCC and support/verification functions of FWF, and the distinctive relations that they establish with other actors in their environment. This variation may be interpreted as leading either to convergence or divergence dynamics between the actions of the organizations (Utting 2005).

On the one hand, convergence entails complementarity between the strategies undertaken by CCC and FWF, in which the former pushes for extending the recognition of labour rights and materializes concrete arrangements with companies, whose implementation and verification are supported by the latter. This convergence is highlighted in the discourses of the two organizations, giving a sense of harmony to their efforts[35]. On the other hand, divergence implies conflicting actions of the NGOs that may hinder the achievement of their goals. This indicates potential tensions between some of their practices: compelling companies *versus* negotiating advances, emphasizing measurable standards *versus* a focus on workers' mobilization capacity, company's image protection *versus* 'naming-and-shaming', self-regulation *versus* mandatory approaches (Utting 2005). Such divergence could, over time, lead the organizations to realign their strategies or polarize their efforts around the interests of specific constituencies, particularly firms and workers. Capturing with accuracy the direction of these trajectories demands a systematic comparison of the organizations' discursive practices at different temporal periods, which might constitute a fruitful exercise for future research on this topic.

The convergence or divergence of NGOs' efforts will be crucial for triggering effective transformations in the patterns of governance of the industry and, thus, improving the conditions of workers in the South. In this process, the ability of the organizations to strengthen their claims of legitimacy for participating in the regulation of labour is a central requirement, and will probably continue to demand systematic efforts from them, as practices in the industry adapt and evolve. Moreover, as stated by Gibbon and Ponte, it remains uncertain 'whether programmes of government result in greater obedience rather than greater efforts in securing obedience' (2008: 377). The positive claims of performance made by the organizations[36], appear to indicate a movement towards greater responsibility of TNCs for working conditions in their supply chains. For example, the recent proliferation of initiatives for improving fire and building safety in Bangladeshi factories[37] may signify an increasing commitment of international buyers to make the industry safer for work-

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[35] See page 36.
[36] See page 32.
[37] See page 17.

ers. Conversely, this may suggest that conformity to the responsibility rationale is still low in the sector and great efforts have to be made by other actors to secure company and factory's compliance.

In this sense, the question of how effective these NGOs have been to increase TNC's responsibility and improve workers' conditions in the garment industry, remains open for further investigation and debate. Similarly, the effects of their organizational discourses in contemporary models of development, which are based on a high mobility of transnational capitals and export-oriented labour-intensive activities in the South, can constitute interesting points of entry for new analyses. Of course, these processes are affected by numerous layers of discourses, material practices and actors at different spatial and temporal dimensions (Jessop 2000), of which CCC and FWF's discourses are only two cases. In this sense, the exploration of discourses of other actors (trade unions, firms and governments) in the Global South and North, as well as potential transformations associated with the increasing influence of countries as China and India in the operation of the garment industry, could provide interesting insights to extend the findings of this research.

6.2. NGOs and global governance

It was suggested in this paper that the discursive practices of the NGOs seem to reflect a process of strategic restructuring of scales and relations among actors in the garment industry[38] (Jessop 2000). In this process, the importance of the national scale seems to subside, while new articulations among local (factory) and global spaces (multilateral organizations, TNCs, consumers) emerge more strongly, with NGOs as a central actor in creating bridges between them. This dynamic entails forms of labour regulation in the industry that go beyond the direct control of national states in 'producer' and 'consumer' countries, been located at the intersection of nongovernmental, governmental and intergovernmental arrangements (Utting 2005). In the case of CCC and FWF, the analysis indicated that both organizations tend to emphasize the promotion of nongovernmental mechanisms of regulation to secure the respect of labour rights in the apparel sector.

These emergent forms of labour regulation raise questions about the continued relevance of the nation state in the midst of economic globalization processes, and the future of political representation and rule-making dynamics that are supposed to take place in public and pluralistic institutions at the national scale. In this sense, the literature indicates a possible 'hollowing-out' of the state's regulatory functions towards international, subnational and nongovernmental spaces (Jessop 1997, Rhodes 2012). Furthermore, some authors argue that complex processes of network governance between state, private and nongovernmental actors might be leading to articulated forms of labour regulation and greater policy coherence at micro and macro levels (Utting 2005: iii). In contrast, less positive accounts suggest that nongovernmental mechanisms may well fall short to solve the problems that originated them and that effective labour regulation continues to lie within the

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[38] See page 27.

domain of public agencies (Lipschutz 2003). The trajectories of these changes and the roles that NGOs may play in them, constitute rich fields for ongoing research and discussion.

Moreover, the restructuring of scales operated in NGOs' discursive practices indicates the emergence of novel social relations in the garment industry, including forms of non-territorial and non-state political representation, solidarity and cooperation among actors located at different spatial and temporal scales. Such relations have the potential to serve as catalyst for wider-ranging struggles aimed at creating alternatives to current paradigms of capitalist production, which recognize the social significance of labour beyond its character as a factor of production (Pegler 2011, Sellwyn 2013, Siegmann et al. 2014). As noted by Jessop, in the unfolding of globalization processes, 'in addition to the changing significance of old places, spaces, scales and horizons, new places are emerging, new spaces are being created, new scales of organization are being developed and new horizons of action are being imagined' (Jessop 2000: 343).

The realization of this potential relies critically on the meaningful engagement of workers and their organizations, in dynamics of global governance and regulation. This research has discussed the potential of NGOs' practices to contribute to this objective, as well as some challenges that they face in doing so. The outcome of their efforts will probably depend on the organizations' ability to surpass strictly technical considerations and engage in the questioning of structural conditions that underpin the profound power inequalities among agents in the industry, as well as those between civil society actors in the South and North.

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Appendices

Appendix 1: Characterization files of the CCC and FWF

N°	Organization/ Category	Clean Clothes Campaign (CCC)/ Schone Kleren Campagne (SKC)	Fair Wear Foundation -FWF
1	**Year of creation**	1989	1999
2	**Location**	Amsterdam, The Netherlands	Amsterdam, The Netherlands
3	**Character**	Non-profit advocacy organization. Network organization consisting of European network coalitions and an international partner network.	Non-profit operational organization. Multi-stakeholder initiative, supported by trade unions, business associations in the garment industry and NGOs.
4	**Origin**	Created as a solidarity campaign in 1989 by Dutch and British women and other solidarity groups in response to the dismissal of striking workers in a garment factory in the Philippines.	Emerged in 1999 after a prolonged negotiation process by business associations, trade unions and NGOs in The Netherlands to provide support to its affiliated companies in the implementation of a model code of conduct and workplace verification.
5	**Mission**	'Clean Clothes Campaign is dedicated to improving working conditions and supporting the empowerment of workers in the global garment and sportswear industries… (We) help ensure that the fundamental rights of workers are respected. We educate and mobilise consumers, lobby companies and governments, and offer direct solidarity support to workers as they fight for their rights and demand better working conditions' (CCC 2014)	'FWF realises good labour conditions by verifying the efforts made and results achieved by affiliates and ambassadors towards the step-by-step implementation of the Code of Labour Practices, in the company's internal management system as well as in the factories where their products are manufactured.' (FWF 2014)
6	**Guiding principles**	- All workers have a right to good and safe working conditions. Workers have a right to know about their rights, minimum standards are derived from ILO conventions and the Universal Declaration on Human Rights - The public has a right to know where and how their garments and sports shoes are produced. The public can and should take action to see that workers' rights are respected. - Workers can and should take the lead in their own organising and empowerment. Workers can best assess their needs and the risks they take when asserting their rights. - Gender issues underlying or facilitating rights violations must be addressed. - National governments and international authorities have an obligation to implement legislation and sanction any failure to do so. - The garment and sports shoe industries have a responsibility to ensure that good labour practices are the norm at all levels of the industry.	- Supply chain responsibility: the Code of conduct can only be fulfilled when sourcing companies, as well as factory management, actively pursue practices that support good working conditions. - Labour standards derived from ILO Conventions and the UN's Declaration on Human Rights: basing FWF's Code on internationally-recognised standards which have been set through tri-partite negotiation. - Multi-stakeholder verification: verification processes developed through multi-stakeholder negotiation, and involving experts from diverse disciplines and perspectives in FWF verification teams. - A process approach to implementation: paying special attention to the means (i.e. building functioning industrial relations systems over time) in order to achieve the end (i.e. sustainable workplace improvements). - Involvement of stakeholders in production countries: engaging local partners in shaping

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		- Brand name garment companies and retailers should adopt a code of labour practice that follows the standards outlined in the CCC model code and should actively pursue social dialogue with trade union organizations, and sign international framework agreements to facilitate such dialogue. - Companies must be transparent about conditions in, and the structure of, their supply networks and regarding actions undertaken to uphold good labour standards. - Trade unions and NGOs should cooperate nationally, regionally and globally to improve conditions in the garment and sports shoe industries and facilitate worker empowerment, without resorting to protectionism.	FWF's approach in a given region or country. - Transparency: keeping relevant stakeholders informed of FWF policies, activities, and results; publicly reporting on member company efforts to fulfill FWF requirements.
7	Governance structure	SKC/CCC has no director or management team. It has three independent teams: the International Secretariat (CCC-IS), the Dutch Secretariat (SKC), and the Bureau (administrative support). The teams collectively take decisions on issues that are related to its planning, strategy and workload in team deliberations. Strategic decisions that concern the entire network are taken at international, thematic and European CCC meetings.	FWF is governed by a board composed by three trade and business associations (Modint, CBW-MITEX and FGHS), two trade unions (FNV Bondgenoten and CNV dienstenbond) and two NGOs (CCC and Brot für alle). The Board and staff are supported by a Committee of Experts composed of organizations that represent also business associations, trade unions and NGOs.
8	Membership	Members include trade unions and NGOs covering a broad spectrum of perspectives and interests, such as women's rights, consumer advocacy and poverty reduction.	Affiliates are companies that produce and distribute products of which the main manufacturing process is sewing. In 2014 there are 80 member companies that represent over 120 brands.
9	Other Alliances / Networks	- Partner network of over 200 organisations and unions in garment-producing countries. - Cooperate with labour rights campaigns in the United States, Canada, and Australia. -Fair, Green and Global Alliance. - CSR platform - WO = MEN. - Fair Wear Foundation.	- Partner network in producer countries. - Jo-In Platform
10	Geographical scope	Active in 15 European countries with CCC chapters, reaches several producing countries located mainly in Asia and Europe.	Active in 15 production countries in Asia, Europe and Africa
11	Financing	Most of its funding comes from the European Union and Dutch Government's subsidies, as well as other donations. (CCC-001)	Funding sources include fees paid by member companies –approximate 50%-, as well as governments and European Union's subsidies, and other donations by NGOs, business associations and trade unions. (FWF-003)
12	Website	www.cleanclothes.org	www.fairwear.org

Source: CCC 2014, CCC-001, CCC-002; FWF 2014, FWF-003, FWF-004

Appendix 2: Clean Clothes Campaign's Organization Chart

| Schone Kleren Platform (SKP) | Schone Kleren Overleg (SKO) | Schone Kleren Overleg (SKO) | Schone Kleren Overleg (SKO) |

Dutch Secretatiat
Informatin
Urgent Appeals
Campaigns
Networks

Bureau
IT
Finances
Org. coordinator
Administration

International Secretatiat
Urgent Appeals
Public outreach
Partners and Networks
Corporate Accountability and labour law

The board
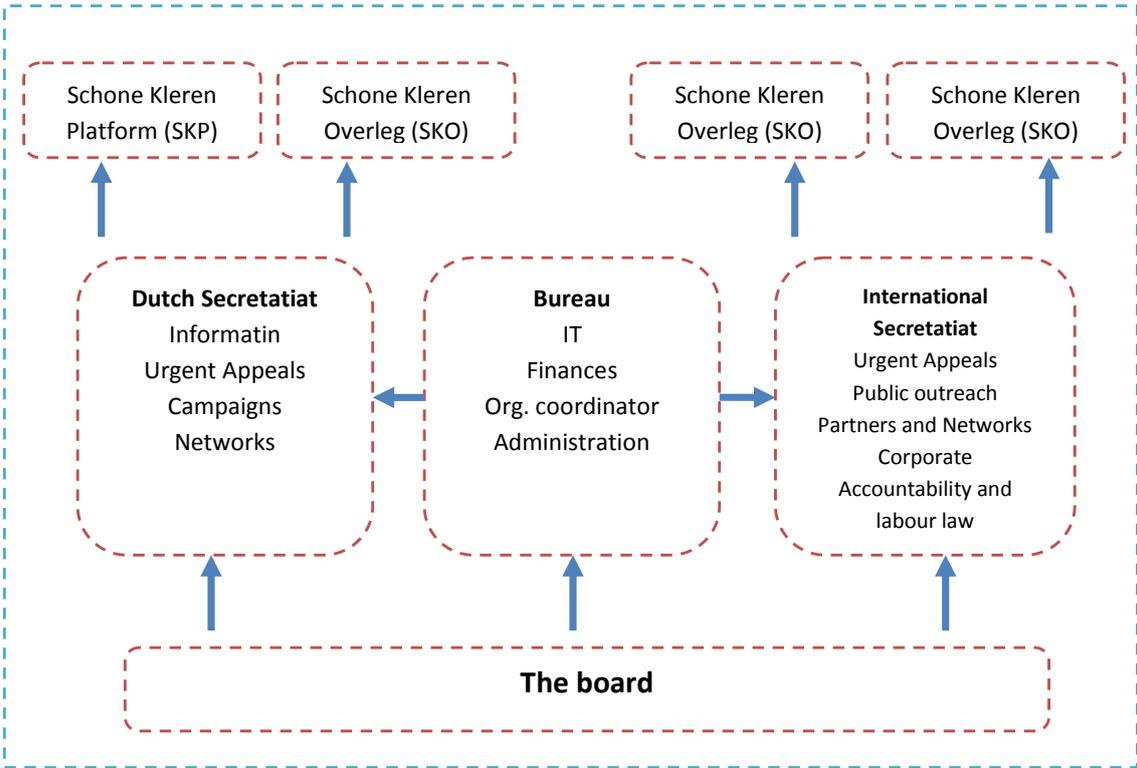
Source: CCC-002

Appendix 3: Fair Wear Foundation's Organization Chart
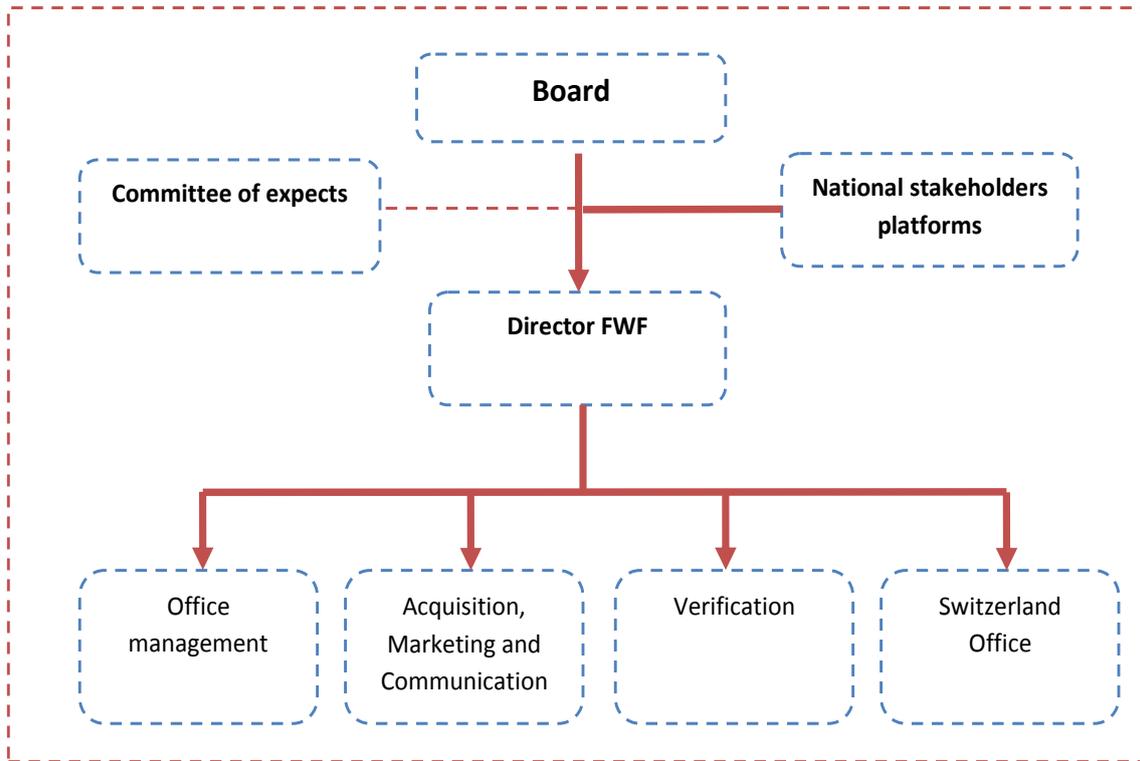
Source: FWF 2014

Appendix 4: Strategies selected for the research

Two strategies of CCC and FWF were selected as the focus of this research, after a thorough revision of the actions undertaken by them that are published in their websites. The criteria used to guarantee a degree of comparativeness in the strategies included that these: a) had being in operation for at least two years; b) addressed labour rights violations in garments factories in Bangladesh; c) one strategy per organization that was recurrent – operated as part of the regular institutionalized functioning of the organization-, and d) one strategy per organization that was context-specific and transitory –in the form of specific projects. On the basis of these criteria, the following strategies were selected to conduct the study:

Organization	Strategy	Brief description	Examined texts
CCC	Developing and circulating appeals for urgent action -Urgent appeals	Advocacy activities by the organization and its networks of partners to support claims of labour rights violations by workers and labour organizations in the garment industry.	CCC-101, CCC-102, CCC-103
	Campaign for Fire and Building Safety in Bangladesh	Campaign for creating and enforcing public and private regulatory frameworks fir and building safety, as well as seeking compensation for the victims of recent fires and collapses in Bangladesh. In cooperation with other NGOs and trade unions, this strategy led to the establishment of the 'Accord for Fire and Building Safety in Bangladesh'.	CCC-201, CCC-202
FWF	Complaints Procedure	Procedure for receiving and investigating workers' reports on labour rights' violations in factories where affiliated companies source from. Implies working with affiliated companies to take actions with their suppliers to solve them.	FWF-101, FWF-102-105
	Preventing Violence against Women Garment Workers in Bangladesh and India	Strategy aimed at providing tools for factories to comply with anti harassment laws, by supporting training for workers and management staff, forming anti harassment committees and using worker help lines to report incidents.	FWF-201

Appendix 5: Corpus of texts under analysis

Code	Name	Author	Year	Genre	Available at
CCC-001	Clean Clothes Campaign/ Schone Kleren Campagne 2011 Annual Report	Clean Clothes Campaign/ Schone Kleren Campagne	2012	Annual report	<http://www.cleanclothes.org/about/annual-reports/2011-annual-report/view>
CCC-002	Clean Clothes Campaign/ Schone Kleren Campagne 2012 Annual Report	Clean Clothes Campaign/ Schone Kleren Campagne	2013	Annual report	<http://www.cleanclothes.org/about/annual-reports/2012-annual-report/view>
CCC-003	Threads: Newsletter of the Clean Clothes Campaign - number 30	Clean Clothes Campaign	2010	Newsletter	<http://www.cleanclothes.org/resources/newsletters/ccc-newsletter-threads-no-30-international-forum/view>
CCC-004	Code of Labour Practices for the Apparel Industry Including Sportswear	Clean Clothes Campaign	1998	Manual	<http://www.cleanclothes.org/resources/publications/clean-clothes-campaign-model-code-of-conduct/view>
CCC-005	Full Package Approach to Labour Codes of Conduct: Four major steps garmen companies can take to ensure their products are made under humane conditions	Clean Clothes Campaign	2008	Manual	<http://www.cleanclothes.org/resources/publications/full-package-approach.pdf/view>
CCC-101	CCC Solidarity Action: Making a Difference for Workers	Clean Clothes Campaign	Not specified	Report	<http://www.cleanclothes.org/resources/publications/07-01-cccpub.pdf/view>
CCC-102	The Clean Clothes Urgent Appeals System: In solidarity with Garment Workers Worldwide	Clean Clothes Campaign	2005	Brochure	<http://www.cleanclothes.org/resources/publications/ua-leaflet.pdf/view>

CCC-103	The Facts Behind Fashion: Urgent appeals report 2013	Clean Clothes Campaign	2014 (website)	Report	<http://www.cleanclothes.org/ua>
CCC-201	Hazardous workplaces: Making the Bangladesh Garmen industry safe	Clean Clothes Campaign	2012	Report	<http://www.cleanclothes.org/resources/publications/2012-11-hazardousworkplaces.pdf/view>
CCC-202	The History behind the Bangladesh Fire and Safety Accord	Clean Clothes Campaign and Maquila Solidarity Network	2013	Report	<http://www.cleanclothes.org/resources/background/history-bangladesh-safety-accord/view>
FWF-001	Manual for companies affiliated to Fair Wear Foundation	Fair Wear Foundation	2009	Manual	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/companies/ManualsReports/manualaffiliatesoctober2009.pdf>
FWF-002	FWF's process approach	Fair Wear Foundation	2012	Brochure	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/policydocs/FWFprocessapproach-nov2012.pdf>
FWF-003	Fair Wear Foundation Annual Report 2012	Fair Wear Foundation	2013	Annual report	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/fwfpublications_reports/FWFAnnualReport2012.pdf>
FWF-004	Fair Wear Foundation Annual Report 2013	Fair Wear Foundation	2014	Annual report	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/fwfpublications_reports/FWFAnnualReport2013.pdf>
FWF-005	The Fair Wear Formula	Fair Wear Foundation	2010	Brochure	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/fwfpublications_reports/thefairwearformula.pdf>
FWF-101	Fair Wear Foundation Complaints Procedure	Fair Wear Foundation	2014	Manual	<http://www.fairwear.org/ul/cms/fck-uploaded/documents/complaints/FWFcomplaintsprocedureJune2013.pdf>

FWF-102 to FWF- 105	Complaint - Pama International/Takko Fashion - Bangladesh	Fair Wear Foundation	2013	Report	<http://www.fairwear.org/506/resources/>
FWF-201	Standing firm against factory floor harassment: preventing violence against women garment workers in Bangladesh and India	Fair Wear Foundation	2013	Report	<http://www.fairwear.org/ul/cms/fck-up-loaded/documents/fwfpublications_reports/StandingFirmReportFWF2013.pdf>

Appendix 6: List of interviews

Number	Name	Organization	Place	Date	Mode
1	W. Ross	FNV Mondiaal	The Hague	30 June 2014	In person
2	C. de Bruin	SKC/CCC	The Hague	21 July 2014	Skype
3	J. Li	FWF	The Hague	04 August 2014	Skype
4	S. Karl	FWF	The Hague	07 August	Skype
5	(name omitted by request of the interviewee)	Bangladeshi labour organization	Amsterdam	29 August 2014	In person

Appendix 7: Template of codification and analysis matrix

Dimension	Questions
Text identification	Assigned code
	Name
	Author
	Year
	Genre
	Summary
Analysis of conditions of production, distribution and consumption	What is the intended audience?
	What is the context in which the text was produced and distributed?
	What meta-discourses are employed?
	Are there references to other texts -intertextuality?
Linguistic analysis	What metaphors are employed and what is their function?
	What are the most relevant rhetoric strategies (assumed premises, associations) employed?
	What kind of vocabulary is used?
Analysis of legitimacy claims	What references to the legitimacy of the organization are present?
	What notions of representation and/or participation are present?
	What notions of accountability are present?
	What assessments of the organization's performance are present?
Analysis of interpretations about the garment industry	How is the garment industry represented?
	What types of labour problems are identified?
	What are the strategies for improving labour conditions?
	What are the roles of workers, companies, governments, multilateral organizations, NGOs in addressing the identified problems?
Other	Other observations