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The Governance of Social Standards in Emerging Markets: An exploration of actors and interests shaping Trustea as a Southern multi-stakeholder initiative

Abstract

Exploitative and inadequate working conditions in developing countries remain a pressing concern in an age of advanced globalisation. As a response to weak regulatory environments, multi-stakeholder initiatives (MSIs) have emerged as a key institution of regulatory governance within globalised production networks. While MSIs governing social standards for workers and producers in North-South trade are well-established, the rapid growth of emerging economies raises new questions regarding the governance of production for local and regional markets in the global South. While some scholars have argued that the growth of Southern markets may lead to a “race to the bottom” for work and employment conditions, a number of recent studies have since documented the introduction of Southern MSIs governing production for local markets.

This article examines the development of Trustea as a Southern MSI governing the rights and conditions of Indian workers and producers supplying tea to India’s domestic market. Drawing on analysis of production networks (PNs), this article demonstrates the key reasons why firms, state and civil society actors from the global North and global South have come to share a mutual interest in governing tea produced for India’s domestic market. The evidence presented challenges the dominant assumption that Southern MSIs tend to be driven by local actors and processes and presents a more complex picture of the evolving relationship between actors from the global North and global South within the development of Southern standards.

Keywords: labour, governance, emerging markets, global production networks, Trustea, India, tea

1. Introduction

Exploitative labour practices and poor working conditions in developing countries remain a pressing social concern in an age of advanced globalisation. To better protect the rights and conditions of workers and producers embedded within production networks (PNs), multi-stakeholder initiatives (MSIs) have been introduced as a key institution of regulatory governance (Dingwerth, 2008; Fransen & Kolk, 2007; O'Rourke, 2006; Turcotte, Reinecke, & den Hond, 2014). In MSIs, lead firms cooperate with civil society organisations (CSOs) and state-based actors to address key challenges associated with poor working conditions within developing countries (Bartley, 2003; Bartley, 2007). Whilst the effectiveness of MSIs in improving conditions for workers and producers has been questioned extensively, their proliferation over the past two decades marks a significant transformation within the global governance of working conditions.

The vast majority of MSIs govern global production networks (GPNs), in which goods and services produced in the global South are consumed in the global North. Therefore, in the context of North-South trade, MSIs are understood to be an important institution governing social standards in developing countries (Schleifer and Sun, 2018). However, global trade flows and the geographies of consumption are shifting (Staritz, Gereffi and Cattaneo, 2011; Gereffi, 2014). Emerging economies now account for a rapidly growing proportion of global imports and the expansion of markets in these regions leads to new questions regarding the governance of social standards in the contemporary era (Nadvi, 2014; Horner and Nadvi, 2018).

Initial assumptions regarding the growth of consumption in emerging economies were largely pessimistic and predicted upon a "race to the bottom" in the conditions of employment for workers and producers (Kaplinsky and Farooki, 2010). However, the emergence of social standards governing production in Southern markets has since challenged this outlook (Hospes, 2014; Schouten and Bitzer, 2015; Pickles, Barrientos and Knorringa, 2016; Giessen *et al.*, 2016). Recent studies indicate that these Southern standards are driven by local actors who have created alternative forms of

governance to the export-oriented standards embedded within global production networks (GPNs). As such, they are predicated upon different forms of legitimacy and are seen to reflect local norms to a greater extent than export-oriented standards (Schouten and Bitzer, 2015). However, this research agenda is still at a nascent stage, with only a handful of case studies examining the actors and processes behind the emergence of Southern standards. There is still considerable research to be conducted, in order to achieve a comprehensive understanding of how and why Southern MSIs have emerged within varied institutional environments.

This paper seeks to address this gap through its examination of a Southern MSI designed to govern social standards within India's domestic tea market. The rights and conditions of employment for tea workers producing for export markets have been governed by various standards for over a decade. Although Northern MSIs such as Rainforest Alliance, Utz Certified and Fair Trade have certified a considerable proportion of Indian tea exported into the EU and other OECD markets, the vast majority of tea produced in India is consumed within the domestic market. This trend has increased in recent years as demand for tea in European markets, especially, continues to decline while demand within the Indian market increases. The reorientation of tea production away from export markets to feed domestic demand has presumably affected the power of Northern actors to influence the governance of tea production. In addition to these regulatory challenges, the continued expansion of domestic consumption has also contributed to a new political economy of tea production, characterised by increased informality within the labour market through the rise of smallholder production (Neilson and Pritchard, 2011). This presumably affects the power of Southern (i.e. domestic) actors to govern the tea industry; particularly as smallholder production is not subject to national labour law. This leads to a widening of a governance gap within both the global production network (GPN) and the domestic production network (DPN) of Indian tea.

The launch of Trustea is arguably a regulatory response to these spatial and temporal transformations within the production and trade of Indian tea. Drawing on the production network

(PN) literature, this paper uses the global production network (GPN) and domestic production network (DPN) as a guiding framework to examine the role and interests of firms, state and civil society actors in shaping Trustea as a Southern standard. This paper asks: ***Which actors and processes have driven the creation of Trustea as a Southern multi-stakeholder initiative?***

While contemporary literature on the governance of emerging markets examines the efforts of Northern actors to expand global programmes within Southern markets (Schleifer and Sun, 2018) or else focuses on the ways through which Southern actors seek to develop local alternatives to Northern standards (Bartley, 2014), the case of Trustea represents a confluence of these two, seemingly distinct processes. Overall, the findings problematise the assumption that Southern MSIs are directed first and foremost by Southern actors; instead illustrating a high degree of involvement by actors from the global North within the development of the multi-stakeholder initiative.

Conceptually, the article advances the polycentric trade framework recently outlined by Horner and Nadvi (2018); recognising that although there are important distinctions to be made between different end markets, there are also important intersections which exist between the commercial and institutional actors who shape the governance of different end markets. The analysis illustrates that the embeddedness of firms, state based and civil society actors within overlapping production networks (i.e. both the domestic and global production networks of Indian tea) problematises the tendency to discuss governance in terms of 'Northern' versus 'Southern' actors. This in turn challenges the assumption that Southern standards are always shaped as reactive institutions in relation to Northern standards; and implies instead that the boundaries between North and South are increasingly indistinct as the members shaping Trustea transcend these categories themselves.

The paper is structured as follows: The next section reviews the development of MSIs in the context of Northern and Southern markets. It establishes that while studies have begun to link the emergence of Southern MSIs to local actors who seek to reclaim authority from Northern MSIs, there is still a significant empirical gap in our understanding of how these MSIs typically emerge.

Section 3 illustrates how shifting end markets for Indian tea alongside structural shifts in the mode of production (from the formal to the informal sector) has created an environment within which Southern *and* Northern actors have developed a strategic interest in governing India's domestic market. Section 4 introduces the case of Trustea and explores the ways through which firms, state-based and civil society actors have shaped its development as a Southern MSI. The evidence presented contributes to contemporary debates regarding the governance of production in an era of polycentric trade; demonstrating that different end markets for tea does not necessarily result in completely separate governance arrangements. Section 5 concludes.

2. The development of social standards within globalised production networks

2.1 Governance of production under globalisation

The vast majority of global trade is at present characterised by the fragmentation of production across geographically disparate regions, in which lead firms outsource key parts of production to suppliers (Dicken, 2015). The development of production networks spanning different continents was facilitated through trade liberalisation and accompanied by rapid shifts in communication technology. This resulted in a new international division of labour in the global economy (Frobel, Heinrichs and Kreye, 1978). The global production network (GPN) framework captures the multi-scalar, multi-actor dimensions of trade in an era of advanced globalisation by examining the 'organised nexus of interconnected functions and operations by firms and non-firm institutions' through which goods and services are produced and governed (Coe, Hess and Yeung, 2004, p. 41). It considers the ways through which the commercial inter-firm relations constituting a global value chain are themselves enveloped within broader institutional dynamics (Henderson *et al.*, 2002; Coe, Dicken and Hess, 2008). Therefore, the empirical focus is on the complex inter-firm and inter-institutional linkages that constitute the governance of fragmented production across borders.

The rise of lead firms as key economic actors in the global economy has created new challenges and opportunities in relation to the governance of production within developing countries. Studies using the GPN framework have illustrated how the purchasing practices of lead firms can lead to the institutionalisation of inadequate labour and social conditions in producer countries (Barrientos and Kritzinger, 2004; Phillips, 2013). Additionally, the framework can be utilised to investigate the different ways through which firms, state-based and civil society actors create standards designed to ameliorate exploitative labour practices. The processes through which this broader institutional context impacts on the commercial (i.e. market) interactions can be understood as the 'embeddedness' of production within the norms, customs and rules of particular territories (Hess, 2004, 2008).

While the study of production networks has tended to examine the governance of North-South trade (in which production within developing countries feeds mass consumption in the global North), the contemporary era of trade is increasingly multi-polar; and is one in which emerging markets account for a growing percentage of consumption and trade (Gereffi, 2014). These trends constitute a potentially significant transformation within the global economy (Guarín & Knorringa, 2013; Knorringa & Guarin, 2015; Sinkovics, Yamin, Nadvi, & Zhang, 2014) and raise questions regarding the forms and mechanisms through which production is governed within Southern markets. The increasingly polycentric nature of global trade has prompted scholars to conceptualise and distinguish additional networks through which Southern and/or Northern lead firms coordinate production for regional and domestic markets in the South (Horner and Nadvi, 2018). Questions have arisen regarding the types of inter-firm linkages present between lead firms and their suppliers within these networks, as well as the degree to which standards are utilised by lead firms to govern production for these markets (Horner, 2016).

The recent introduction of domestic and regional production networks (DPN/RPNs) into the global production network (GPN) literature builds a framework of analysis sensitive to multi-polar trade flows (Horner and Nadvi, 2018). As such, it facilitates exploration of how production networks oriented towards different end markets may converge or diverge in terms of their coordination and governance. Table 1 below illustrates the key characteristics of global, regional and domestic production networks as well as the ‘flow’ of trade within each network. Together, a heuristic framework mapping production feeding multiple end markets is constructed by accounting for different geographies of trade and consumption.

Type of production network	Definition and Characteristics	Direction/Flow of trade
Global production network	Global production networks are those where lead firms source from and supply to international markets that cross substantial geographical boundaries. Here, the term ‘global’ doesn’t necessitate the presence of the network	North-South, although if GPNs are understood as operating across at least two continents then North-North, North-South or South-South could also apply. This hasn’t tended to be the focus of GPN studies to date however as they

	within every country or continent to meet the definition, but instead can refer to activities that are at least integrated across two or more countries.	have empirically focused on North-South trade.
Regional production network	Regional production networks represent a situation whereby lead firms are supplying markets in neighbouring and regional economies as well as sourcing from, and sub-contracting to, regional suppliers. The term 'region' here applies to established regional markets as defined by (a) markets which function under common regulatory regimes (EU) (b) preferential trading rules for their regional members (ASEAN) (c) notional regional identity	Trade could be North-North, North-South or South-South
Domestic production network	Domestic value chains are those that are organised and led by local lead firms, source from national suppliers and feed demand in domestic end markets.	As the network is contained within a local setting, the authors don't depict a direction of trade flow. However, the ways in which the domestic production network is itself is connected to shifting trade flows occurring within regional and global trade flows, it is important to understand how the local market relates to these flows. For example, the fact that trade patterns may move from North-South to domestic production networks in the global South could arguably be seen as a broader movement from North-South to South-South trade.

Table 1 Types of Production Network (Source: adapted from Horner and Nadvi 2018, p.222)

2.2 The emergence of multi-stakeholder initiatives

While public regulations and legal frameworks play an important role in regulating the rights and conditions of workers and producers, continued evidence of weakly enforced, and in some cases inadequate public standards has led to a plethora of privately-governed standards in recent years (Cheyns, 2011; Mena and Palazzo, 2012). At present, one of the most common institutional forms used to govern standards within PNs is the multi-stakeholder initiative (MSI). MSIs are formed by

stakeholders who wish to collectively address social and/or environmental problems within production processes (Hughes, 2001; Fransen, 2012; Hospes, 2014). Stakeholders may include representatives of corporations, NGOs, trade unions, ethnic or community organisations as well as less frequent representation from governmental or inter-governmental organisations (Moog, Spicer and Böhm, 2015). Members cooperate in order to develop codes of conduct which are subsequently used (across a production network) in order to verify that suppliers meet the specified standards agreed upon by the members of the MSI (Fransen and Kolk, 2007). Key MSIs governing global trade include the Forestry Stewardship Council, Rainforest Alliance and the Marine Stewardship Council.

MSIs which govern rights and conditions of wage labour and smallholder livelihoods are known as social standards (Pickles, Barrientos and Knorringa, 2016, p. 6). Within global production networks, MSIs have commonly been used to govern North-South trade flows of goods and services. Their introduction into GPNs has been understood as a reaction by lead firms to increased civil society and media exposés of exploitative social conditions of production within developing countries (Sasser *et al.*, 2006). Firms have used their participation within MSIs to protect their reputation and secure their market position in light of these broader developments (Fuchs, Kalfagianni and Havinga, 2011; Barrientos, 2013; Fransen and Burgoon, 2015). Yet while concerns about reputational damage imply strong societal pressure to govern production, the extent to which consumers have played a leading role in driving the creation of private governance through ethical purchasing preferences remains a subject of debate (Carrigan and Attalla, 2001).

To date, the overwhelming majority of MSIs have governed goods and services produced for Northern markets. The transmission of social standards through GPNs has raised important questions regarding the relationship between Northern standard-setters and the firms, workers and producers (predominantly from developing countries) who are expected to comply with these standards. Studies examining North-South interactions within private governance initiatives have noted that MSIs governing exports to Northern markets tend to marginalise or exclude Southern

actors through unequal representation of interests and/or participation within the internal governance of the standard (Pattberg, 2006; Bitzer, Francken and Glasbergen, 2008; Dingwerth, 2008). This has led to a domination of Northern discourses over Southern discourses within Northern MSIs (Cheyns, 2011; Ponte and Cheyns, 2013). The insertion of export-oriented standards into local institutional environments also creates a layering of additional governance 'rules' alongside pre-existing state regulations (Locke, Rissing and Pal, 2013; Amengual and Chirot, 2016). Therefore, the extent to which private and public forms of governance complement or compete at the local level has been the subject of extensive research (Locke, Rissing and Pal, 2013; Bartley, 2014; Amengual and Chirot, 2016).

Consequently, as a result of these territorial distinctions, the study of MSIs governing GPNs has led scholars to analytically distinguish actors and interests based on their geographical position; with most studies examining the 'global' actors who set standards and the 'local' actors who experience them (De Neve, 2008; Otieno and Knorringa, 2012). These binary distinctions are a product of the tendency for scholars of globalisation to assume that production of goods and services predominantly takes place within the global South for end markets in the global North. However, North-South trade flows of goods and services are only one geographical constituent of globalised production, and as discussed above, recognition of this fact has resulted in an expansion of the original GPN framework to now include discussions of governance within regional and domestic PNs. Understanding patterns and dynamics of co-ordination and governance within these localised networks of production has become ever more important under a 'new geography of trade' (Horner and Nadvi, 2018, p. 208). For instance, Northern markets will soon constitute a smaller fraction of total global demand for many goods and services compared to the South; with emerging markets expected to expand from just 36% of the global share of middle class consumption in 2009 to over 60% by 2030 (Kharas, 2010). Indeed, updated figures suggest that Asia alone could constitute approximately 65% of the share of the global middle class by 2030 (Kharas, 2017).

India's domestic market has been transformed by the rise of the middle class; whose consumer habits are shaped by rising incomes, exposure to international life styles and media, access to information and willingness to try foreign products and services (Javalgi and Grossman, 2016). While rising incomes have led to higher levels of discretionary spending, recent studies suggest that attitudes are also changing in relation to both the quality and the ethical credentials of products purchased (Guarín and Knorringa, 2013). The altered preferences of emerging market consumers raise important questions regarding the governance of social standards in the global South; particularly as production networks are reoriented from global markets in order to cater for increases in local demand. Within these shifting dynamics, the attitudes and responses of Southern firms, state and civil society actors in developing new institutions of governance (including MSIs) becomes ever more critical to examine from a regulatory perspective. Related to this, is the question of whether Northern actors might also seek to shape the governance of emerging markets as we enter an increasingly polycentric age of global trade.

2.3 The emergence of Southern MSIs

New geographies of trade and consumption raise questions regarding the interests of Southern firms, state-based and civil society actors in governing production. This is pertinent given that shifts in economic and geopolitical power may encourage Southern actors to play 'increasingly significant roles in shaping the new contours of globalisation' (Horner and Nadvi, 2018, p. 208). While the development of Southern MSIs and other standards designed to govern production in line with social concerns was considered unlikely, given seemingly lower consumer activism or interest in such factors (Kaplinsky and Farooki, 2010), recent literature has challenged this assumption by mapping the emergence of Southern standards across a number of different sectors (Hospes, 2014; Schouten and Bitzer, 2015; Giessen *et al.*, 2016). These studies are accompanied by findings which indicate that consumers in these markets are displaying awareness of social issues in addition to concerns regarding the quality of the goods and services they consume (Guarín and Knorringa, 2013). The

debate has moved on from questions of *whether* Southern markets will be governed by new standards to questions regarding *how* these standards are shaped and implemented.

Studies documenting the growth of Southern standards have tended to illustrate their development as being linked to political struggles regarding who should govern production processes (Bartley, 2014; Schouten and Bitzer, 2015). Southern standards are frequently seen as reactive because their development has been led by actors who challenge the hegemony of Northern standards through the creation of 'local' alternatives (Schouten and Bitzer, 2015). In many cases, the state plays a central role in these efforts. Evidence from the Chinese timber industry illustrates that the government created an alternative domestically-driven certification scheme, thus reducing the space for Northern standards (Bartley, 2014, p. 103). Likewise, in Indonesia, state actors are reclaiming authority from transnational certification schemes through the introduction of state-led mandatory schemes; challenging 'private and transnational certification institutions in support of government-driven international certification regimes' (Giessen *et al.*, 2016, p. 71). Thus, the current phase in the governance of production in emerging markets is characterised by Southern state actors developing standards and certification schemes in direct competition to Northern initiatives (Wijaya and Glasbergen, 2016). However, it is not only Southern actors who are doing so. Recent research by Foley and Havice (2018) illustrated that territorialised eco-certification schemes are emerging in the global North which challenge the primacy of Marine Stewardship Council in its governance of the global fisheries industry. Such efforts are once again supported by state actors. These multi-scalar tensions between the global and the local appear to characterise the development of standard setting both in the global North and the global South.

Shifting geographies of trade and consumption may also lead Northern actors to exploit the emergence of Southern markets to expand their own governance programmes and standards. Evidence is emerging that this is the case, and can materialise through several different mechanisms. Firstly, Northern lead firms seeking to capture market share in Southern markets may transfer

governance practices from the GPN to regional and domestic PNs. Evidence of this has occurred in the case of East Africa, in which standards crossed from global into regional markets via the internationalisation strategies of global retailers (Pickles, Barrientos and Knorringa, 2016). Secondly, standard setters and sustainability programmes are also seeking to expand market share within emerging markets. The roll-out of the Roundtable on Sustainable Palm Oil (RSPO) in both the Chinese and Indian markets is one example of how global standards have sought to expand within domestic markets, with mixed uptake by local firms (Schleifer and Sun, 2018). Thirdly, civil society organisations such as NGOs from the global North may also seek to influence the governance of standards in emerging markets, as will be discussed in the case of Trustea.

Put simply, this means that North-South/South-South production networks may not necessarily exist within separate commercial and institutional spaces; but instead be subject to multiple types of 'linkage' which could affect the development and character of Southern standards. If this is the case, the presumption that Southern MSIs are always driven by local actors could and should be challenged. This paper uses the case of Trustea to illustrate how the growth of emerging markets has altered the strategies and interests of both Northern and Southern actors in shaping the development of Southern MSIs, and crucially illuminates the difficulty in differentiating the boundaries between North and South.

3. The Indian Tea Industry

3.1 Case study methodology

A case study methodology (eg. Yin 2009; Robson and McCartan 2016) was used to generate insightful data capturing the development of a new Southern MSI governing the production of tea for India's domestic market. Fieldwork was undertaken in the UK, the Netherlands and India (primarily Delhi, Bangalore and Kolkata) between 2014-2016; during which in-depth, semi-structured interviews were conducted with sixty-nine individuals from lead firms, supplier firms, government

bodies and civil society actors (including trade unions). Interviewees were selected based on their involvement in the governance of tea produced for the GPN and/or DPN. As such, respondents linked to the development of Trustea were interviewed alongside a wider selection of relevant stakeholders. Key questions raised in the interviews facilitated the identification of the actors and drivers behind Trustea's development, the influence of broader shifts in the political economy of tea production on the governance of the sector, as well as relations and dynamics present between Trustea and the wider institutional environment. Interviews were supplemented by the use of secondary data sources including trade data and reports produced by companies, government and civil society organisations involved in the governance of standards within the Indian and global tea sectors.

3.2 From uni-directional to polycentric: shifting markets for Indian tea

India is one of the largest producers of tea globally. Tea was first introduced into the Indian market as a colonial cash crop under British occupation (Neilson and Pritchard, 2011). The use of indentured workers in the tea plantations and the thousands of deaths of 'tea coolies' during the colonial period through severe exploitation marks a dark period in the history of the industry (Sengupta 2009).

Initially, all Indian tea was cultivated for export. However, a number of exogenous economic factors (most notably the Great Depression) led both British and Indian companies to foster a domestic market for tea in the first half of the twentieth century; albeit with limited success (Lutgendorf, 2012). During the 1960s, the introduction of new technologies within the processing of tea led to a huge increase in the availability of affordable tea in the local market. This drove a significant growth in domestic consumption (aided through extensive marketing campaigns), which has continued to the present day (Lutgendorf, 2012). In recent years, population growth, urbanisation and rising incomes have further boosted demand for tea in emerging economies, including India (FAO 2015). In the period 1991-2010, the volume of tea consumed in India has risen from 500 million kg to over 800 million kg (see Figure 1) and while per capita consumption is still relatively low compared to other countries, the overall increase in demand has meant that the majority of the tea produced in India

has fed domestic (as opposed to export) markets; a trend which has continued to increase over the past few decades (Arya 2013). As a result, India has recently overtaken China as the world’s largest consumer of black tea, with over one million tonnes of tea consumed nationally in 2015 (FAO, 2015). In addition, the increased preference for packaged (as opposed to loose leaf) tea is indicative of shifting consumer preferences within India’s domestic tea market (Kadavil, 2007). The growth in sales of packaged, branded teas has been linked to increased concerns regarding the quality of tea, as consumers reportedly see packaged teas as more trustworthy than loose-leaf teas (Tea Board 2018).

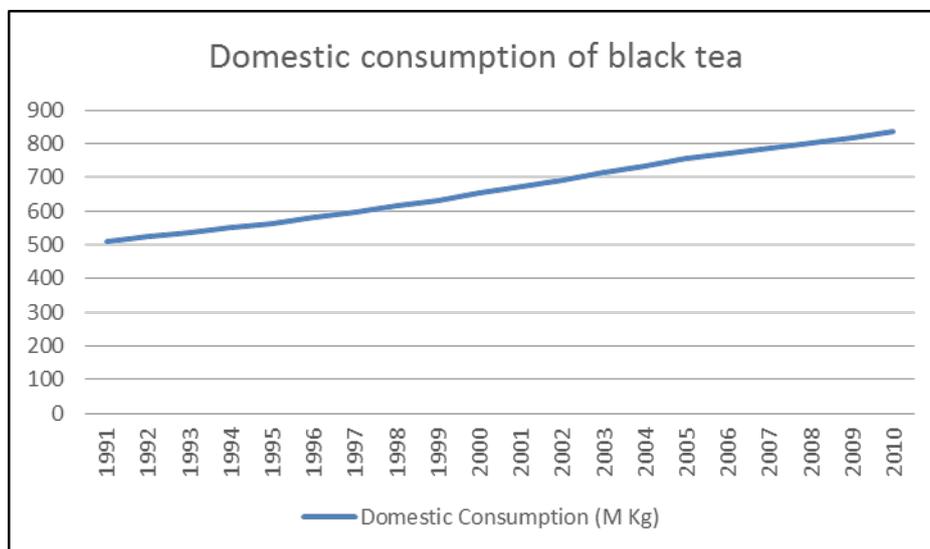


Figure 1 Changing Domestic Demand for Indian Tea (Volume M Kg) 1991-2010 (Source: Tea Board of India 2013)

The growth of the domestic market, accompanied by shifting consumer attitudes, has a number of significant implications for actors and institutions involved in the regulation and governance of Indian and global tea production. In terms of governance, these trends would imply a stronger interest on the part of firms, NGOs and state actors to shape standards and regulations for the domestic, as well as the global tea market. Indeed, any public or private standards governing labour and social conditions within the Indian tea sector at the national scale, and/or for the domestic market would govern the majority of Indian tea production and would protect higher numbers of workers and producers as compared to export-oriented standards.

While demand for black tea within India’s domestic market continues to grow, global trends indicate that EU/OECD markets for black tea are contracting in size. During the period 2012-2015, the total value of exports of Indian tea to the UK market fell by 33.6%, with similar contractions occurring within the German and Australian markets (UN Comtrade 2015). The decline in tea consumption within these markets correlates to the increased popularity of coffee (Mintel, 2015). However, despite an overall decline in demand in Northern markets, there is evidence from trade data that non-OECD markets are importing ever-greater quantities of Indian tea. This has occurred most notably in Russia where Indian tea imports have significantly increased in the past decade (see Figure 2 below).

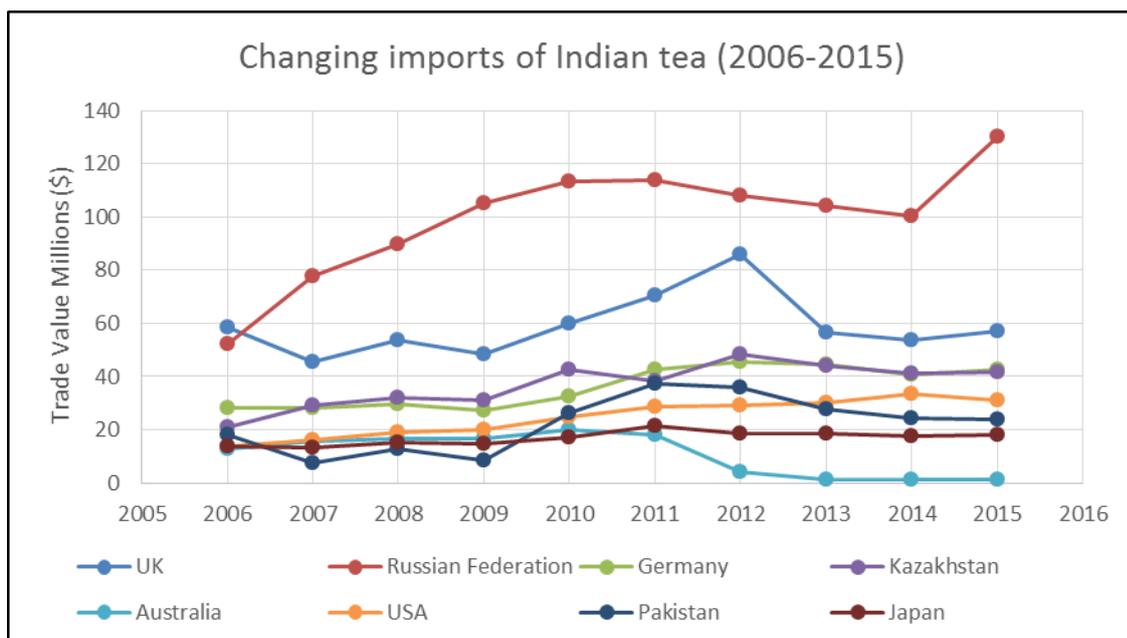


Figure 2 Changing Imports of Indian Tea 2006-2015 (Source: UN Comtrade)

Overall, these trends have important implications for the governance of Indian tea under shifting end markets. This is due to the fact that there is a higher density of standards governing EU and OECD markets, with a tendency for fewer regulatory standards present within non-OECD markets in the South.

3.3 Shifting political economy of tea production in the domestic market

The political economy of tea production in India has not only been affected by shifting trade flows, but also by changes in the modes of production. Traditionally, tea was cultivated on plantation estates. These tend to be relatively large in scale at 200 hectares or above (Kadavil, 2007). However, smallholder based production has risen dramatically over recent decades in response to a number of structural constraints within the Indian tea industry (Hayami and Damodaran, 2004). While smallholders, who cultivate less than 25 acres (or 10.12 hectares) accounted for just 7% of production in 1991, by 2013 they were responsible for over 31% of total production (see Table 2). More recent figures place the percentage of tea production emanating from smallholders at 44% (Bolton 2018).

Year	Small growers	Plantation estates
1991	7%	93%
2001	24%	76%
2011	28.39%	71.61%
2012	32.24%	67.76%
2013	31.23%	68.77%

Table 2 Percentage of tea production (by volume) originating from smallholders and plantation estates (Tea Board of India 2013)

While tea cultivated on the plantations tends to be processed on site in the estate factories, tea produced by smallholders is often transported to nearby bought leaf factories (Neilson and Pritchard, 2011). Here, tea leaves are processed and sold on to buyers (through direct sale) or via auction centres (Kadavil, 2007). These differences have implications for the traceability of tea, with the latter affording lead firms' greater levels of traceability than the former. The distinct typology of tea production in terms of size of holding and ownership structures are illustrated in Table 3 below.

Type	Size	Ownership	Processing Facilities
Small holding	1 to 25 acres (10.12 hectares),	Single Proprietor (family-based smallholdings)	None- leaf is transported to bought leaf factory
Small gardens	<200 hectares	Single proprietor or partnership firms	Processing facilities may be on site, or else tea would be processed offsite (at a bought leaf factory)
Large Estates	>200 hectares	Large Companies, Limited Liability Companies or State/Worker ownership	Processing facilities on site

Table 3 Ownership structures in the Indian tea industry (Source: Kadavil 2007)

Such distinctions are important when considering the co-ordination of production for global versus domestic production networks. Tea produced for GPNs originates from the larger tea gardens and estates whereas tea sourced for the DPN originates from both the large estates, small gardens and smallholder producers. Therefore, there are notable differences in the modes of production which feed global versus local markets¹.

3.3 Implications of changing political economy for governance

In the GPN, tea is sourced solely from plantation estates. The two largest lead firms coordinating the GPN (by global market share) are the Anglo-Dutch conglomerate Unilever and Tetley, owned by the Indian conglomerate Tata. These two firms together control 16% of the global tea market (Potts et al 2014). At the local scale of the GPN, the Plantation Labour Act (1948) governs the rights and conditions of workers on the plantations (Neilson and Pritchard, 2011; Bhattacharya, 2015). Thus tea estates and tea gardens are very much part of the formal and publicly regulated economy. However, tea exports into EU and OECD markets are also governed by a number of private standards within the GPN. These are utilised by the lead firms to verify that tea sourced from producer countries meets particular product and process standards. Rainforest Alliance is the MSI chosen by Unilever and Tetley, as well as their major competitors to certify tea sold in Northern markets is in conformance with social standards. Given the market position of these global firms, RA has become the world's largest certifier of tea and as of 2018 had certified 19.9% of the world's tea supply (Rainforest Alliance 2018).

In the DPN, tea is sourced from plantation estates and smallholders. The two largest firms coordinating the DPN are Unilever's subsidiary firm Hindustan Unilever, alongside Tata Global

¹ Whilst there appears to be a firm separation between the modes of production within the GPN and the DPN, there is increased evidence to suggest that plantation estates are outsourcing production to out-growers located in proximity to the estate factories.

Beverages (which acquired Tetley in 2005). Together, these two local lead firms control 51% of the packed tea market in India (Neilson and Pritchard, 2011). In essence, this means that the GPN and DPN are commercially linked because the GPN and the DPN are coordinated by the same companies to a large extent. While plantations in the DPN are subject to the regulations contained in the Plantation Labour Act, the smallholder segment of production is neither regulated by national labour law nor by private standards (prior to the creation of Trustea). Given the largely unregulated nature of smallholder production, smallholders are part of the informal economy; existing outside the purview of public regulations. Historically, lead firms had not sought to align private governance practices across the GPN and DPN. However, the launch of Trustea in 2013 appears to mark a change in their approach to the governance of emerging markets. The following section now turns to examine the ways through which firms, state-based and civil society actors positioned within the GPN and/or the DPN came to shape Trustea's development.

4. The creation of a Southern MSI

4.1 The launch of Trustea

In July 2013, Hindustan Unilever, Tata Global Beverages and the Tea Board of India announced the launch of Trustea (www.trustea.org); a new standard designed to govern social conditions of tea produced for India's domestic tea market. Trustea is a code of conduct comprised of eleven chapters, each pertaining to different areas of regulation. This includes not only social chapters (labour standards in plantations and small tea gardens, worker protection and welfare) but also environmental chapters (pesticides, waste disposal and water management) and food safety standards. Trustea is funded by Hindustan Unilever (HUL), Tata Global Beverages (TGB) and IDH (*Initiatief Duurzame Handel*). There are three tiers of representation within the internal structure of Trustea, as illustrated in Figure 3. The Funders Steering Committee consists of the two largest domestic lead firms and the Dutch development agency IDH. The Programme Committee consists of

key advisors and implementers within the development of Trustea, along with the funders. The Advisory Committee constitutes a more inclusive forum through which external stakeholders are invited to comment on Trustea's development.

Although ostensibly Trustea is a Southern MSI, Trustea's creation appears to be partially driven by organisations that have hitherto played a central role in the governance of tea exports into EU and OECD markets. Hindustan Unilever is the subsidiary firm of the global lead firm Unilever, and as examined below, the interest of the company in developing Trustea was partially driven by targets set by the global headquarters of the firm. In addition, as illustrated in Figure 3, other supporting organisations include IDH and Solidaridad; both of which are Dutch organisations involved in the creation and facilitation of public-private partnerships for development. However, the involvement of local state-based agencies such as the Tea Board of India demonstrates that Trustea is at least partially directed by local interests, and indeed both Hindustan Unilever and Tata Global Beverages can be regarded as lead firms in both the global and domestic tea markets. It is this confluence of Northern and Southern interests as embodied within these organisations which forms the central empirical investigation of this paper. A full list of members can be found in Figure 3 below:

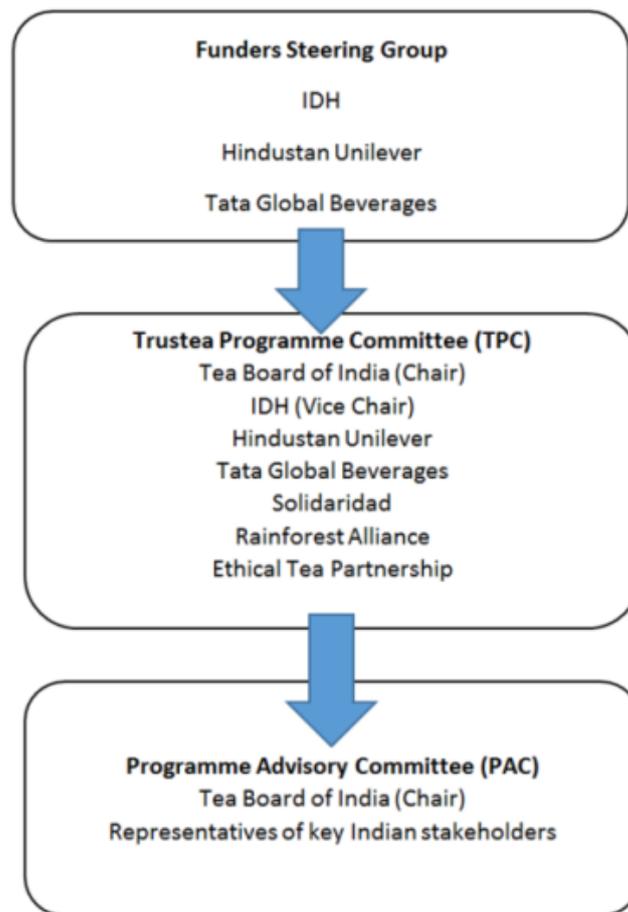


Figure 3 Membership of Trustea (Source: Trustea Website)

Table 4 illustrates the linkages present between firms, state-based and civil society actors across the GPN and DPN. It demonstrates two key points in relation to the governance of Trustea. Firstly, its development has been partly shaped by global actors who have also been instrumental in the development of export standards in the Indian tea sector. Secondly, these actors appear to have organisational linkages to actors governing the DPN of Indian tea production. The linkages are indicated in the diagram through the use of arrows.

Actor	Domestic Production Network	Global Production Network
Private (Lead Firm)	Hindustan Unilever (2013) Tata Global Beverages (2014)	Unilever (2013) Tetleys (Tata) (2014)
Civil society (NGO)	Solidaridad India (2013)	Solidaridad (2013) Rainforest Alliance (2013) Utz Certified (2013) Ethical Tea Partnership (2012-2013)
Public (State)	Tea Board of India (2014)	IDH (2013)

Table 4 Key members of Trustea and their position across the DPN and the GPN (Source: Author)

The following section illustrates how these 'linkages' influenced the ability for Northern and Southern actors to shape the development of Trustea. It examines the role of firms, state-based and civil society actors in shaping the MSI at the global and local scales.

4.2 Firms

Unilever is the largest global buyer of tea (Potts *et al.*, 2014) and its interest in governing production across producer countries has been an important driver of Trustea's development. The multinational firm sells fast moving consumer goods (FMCG) across 190 countries, reporting an annual turnover of €52.7 billion in 2016 (Unilever 2016). Recent estimates state that Unilever is responsible for buying around 12% of the tea produced globally (by volume), whilst its two major competitors (Tata Global Beverages and Twinings) are responsible for purchasing 4% and 3% of the total tea available on the global market respectively (Potts *et al.*, 2014). As such, Unilever is the dominant lead firm and its branded teas are sold in both developed and emerging markets in the global North and South. Unilever's ability to capture emerging markets has depended in part on foreign direct investment. Retaining a majority share in domestic companies within Southern markets has enabled Unilever to expand their presence in emerging economies. By 2012, over 55% of the company's total footprint (for all products) was held within emerging markets, with a projection of 75% of overall profits to come from emerging markets by 2020 (Unilever, 2015). These projections have led Unilever to strategically pursue expansion within these markets, selling off well-known brands within advanced markets whilst simultaneously focusing their expansion within Southern markets. As such, Unilever is one example of a global lead firm which is adapting to the changing geographies of consumption in an era of polycentric trade.

In the tea sector, Unilever was the first lead firm to introduce MSIs to govern social standards within GPNs. In 2007, Unilever announced that all tea the company sold in EU markets would be certified using Rainforest Alliance. However, given that Indian tea exports into Northern markets constituted

a small percentage of the total tea produced; these standards only governed a fraction of India's overall tea production (Neilson & Pritchard 2011). Nevertheless, Unilever experienced a number of commercial benefits following the introduction of standards within the GPN, including competitive gains derived from increased market share. For example, the launch of RA certified tea in Australia saw the market share of Unilever's Lipton brand rise from 24.2% to 25.8% in just one year (Henderson and Nellemann, 2012).

While initial engagement with social standards focused on Northern markets (i.e. EU and OECD markets) the Unilever Sustainable Living Plan (USLP) launched in 2010 stipulated that raw materials sourced by the firm must be sustainably produced by 2020 across *all* markets in which they operated (Unilever 2015). The approach marked a transition from a GPN-focused system of certification to additionally include the governance of regional and domestic production networks. However, in order to achieve this, Unilever had to align governance practices across its various subsidiaries. In India, this necessitated standards coordination with the local subsidiary firm Hindustan Unilever. Hindustan Unilever (HUL) is India's largest fast-moving consumer goods corporation; owning 40 factories and employing ~22,000 people in India. In 2013, it had an annual turnover of €3.8 billion (Unilever 2013). Whereas Unilever procures tea from East Africa and Asia for export (excluding domestic market-oriented production from India) from its central tea buying offices, Hindustan Unilever is responsible for buying tea for the local Indian market through a separate local tea-buying department. This constitutes a domestic production network in which Hindustan Unilever operates as a local lead firm and is responsible for the procurement of tea for the domestic market.

It is this intersection between Unilever and Hindustan Unilever in which an initial attempt to link governance across the GPN and DPN occurred. Unilever initially attempted to expand Rainforest Alliance certification into Southern markets; thus exhibiting convergence of governance practices regardless of the location of end markets. However, in the case of India there were irreconcilable differences between Rainforest Alliance's code of conduct and Indian labour law. Indian labour law

stipulates that children from the age of fourteen are allowed to work in non-hazardous industries. However, Rainforest Alliance, through its collaboration with the Sustainable Agriculture Network (SAN), stipulates that the minimum age for labour is fifteen. While export-oriented MSIs were able to implement more stringent standards, there was an understanding that asking suppliers to the domestic market to comply with Rainforest Alliance's code would be unrealistic given the stark differences in product and process standards which existed. Rainforest Alliance also faced difficulty in engaging with the small tea growers, having only ever certified Indian tea plantations supplying Northern end markets. Given that smallholders represented a growing percentage of production for the domestic market and yet remained highly fragmented, these barriers were significant obstacles for Rainforest Alliance. This prevented a standardised approach to certification across markets.

Despite initial attempts to converge standards across the GPN to the DPN, it became apparent that a continuation of Unilever's partnership with RA could not be easily replicated within the institutional confines of the domestic production network. Unilever's realisation that a 'tea specific, Indian specific code' would be needed for the domestic market led the company to explore the feasibility of developing a new tea standard geared for the domestic Indian market, with Hindustan Unilever leading these efforts. However, as can be seen in Figure 3, Rainforest Alliance were invited to be a participant of the Trustea Programme Committee; and as a result, some of the content of Trustea's code of conduct is lifted directly from Rainforest Alliance's tea code.

4.3 State based actors

The Tea Board of India operates as a quasi-autonomous body under the Ministry of Commerce and Industry, Government of India. Initially created as a state-centred producer marketing board, it has authority with respect to the authorising, registering and licensing of all industrial activities within the tea sector (Neilson & Pritchard, 2011). It has been described on Trustea's website and marketing materials as its 'champion' and is appointed as both the Chairman of the Programme Committee and Advisory Committee. The Tea Board's upkeep is maintained through a tax on tea producers (Neilson

and Pritchard, 2011). The original purpose of the organisation was the promotion of tea within both foreign and domestic markets under British colonialism. Since Independence, the Tea Board has maintained its role as a marketing board as well as a regulator of the sector.

The rapid growth of smallholder production in India in recent years has presented a dilemma for the Tea Board. On the one hand, smallholders need to be supported in order to meet future domestic demand as without them India would become a 'net importer of tea' (Tea Board of India 2013). However, the ungoverned nature of smallholder production has led to reputational problems regarding the quality and safety standards of the tea being produced. It is in this context that the Tea Board announced the formation of a Small Tea Growers Directorate in 2012; a division of the organisation created with the sole purpose of supporting the smallholder segment of production. However, a 2013 campaign by an Indian NGO highlighted the misapplication of pesticides by tea smallholdings, which in turn breached national food safety standards. The research conducted also highlighted the use of illegal chemicals within the smallholder sector, which angered local consumers and is alleged to have resulted in increased imports of tea from other producer countries (Greenpeace 2013). The Tea Board of India initially responded to the NGO campaign by announcing the establishment of a Plant Protection Code (PPC). This code was designed to tackle the unregulated use of pesticides (including the use of illegal substances) in the tea industry. However, local NGOs criticised the PPC as a form of self-regulation which would be inadequate at tackling the systemic problems facing small tea growers.

Meanwhile, the institutional environment for the support of MSIs governing production was evolving in Northern markets. State-based actors in the Netherlands had come to play a key role in facilitating the development of MSIs and supporting their subsequent proliferation within producer countries. The formation of the publicly-funded body IDH (*Initiatief Duurzame Handel*) in 2008 allowed the Dutch Government to co-finance commodity programmes with the private sector and to

facilitate public-private partnerships for development (Ministry of Foreign Affairs of the Netherlands, 2014)². Its creation can be seen as part of a wider transition in thinking whereby private sector engagement became an increasingly central element of Dutch development cooperation policy (OECD 2016). IDH operates as an MSI comprised of private companies, non-governmental organisations, trade unions and the Dutch Government and addresses key sustainability issues (both social and environmental) within supply chains across a variety of different sectors (tea, cocoa, coffee, flowers, and cotton) (Ministry of Foreign Affairs of the Netherlands, 2014).

The tea sector is one of the key areas IDH is focused on. IDH's support for advancing a sustainable tea sector began through its Tea Improvement Programme (TIP). The initial focus was on the GPN wherein the TIP facilitated an expansion of Utz Certified certification to producers exporting into European markets. However, some NGO stakeholders involved felt that the promotion of standards such as Utz Certified was not effective in reaching the more problematic (socially and environmentally speaking) parts of the production network. This related specifically to those producers who were supplying domestic (and not export) markets (Solidaridad 2011). Following this criticism, and realising the developmental potential of certifying production in Southern markets, IDH decided to begin funding standards governing production within DPNs. Indonesia was the first country through which the TIP sought to develop a domestic tea standard in 2012 (known as Teh Lestari). There was clear commercial support for the development of such programmes, as shortly afterwards Unilever approached IDH to request technical and financial support for the development of a new domestic tea standard in India. Due to IDH's policy of fostering 'pre-competitive partnerships' on sustainability, IDH requested that Unilever partner with another firm in order to develop a code of conduct for India's domestic production network. Consequently, Unilever reached out to Tata Global Beverages (TGB), its leading competitor in both global and domestic markets for

² In the period 2008-2013, the Ministry of Foreign Affairs committed EUR 123 million in official development assistance (ODA) to build and run IDH.

tea and following a lengthy series of negotiations, Tata agreed to join Trustea one year into the programme.

Perhaps surprisingly, the evidence illustrates that state-based actors in the global North played a key role in the development of Trustea as a Southern MSI. State support for Trustea at the local scale was also shared by the Tea Board of India who agreed to join the MSI as the 'champion' of Trustea. This resulted in the politicisation of Trustea as the Union Minister of Commerce and Industry claimed that it was the government who had created the standard in response to public concerns regarding the safety of Indian tea consumption. Although the Tea Board makes no financial contribution, there are mutual benefits which have arisen from its participation within Trustea. The Tea Board's membership has legitimised Trustea as a national standard which allows the MSI to claim it has been developed by local actors and interests. Furthermore, Trustea's incorporation of the Plant Protection Code (a Tea Board initiative) has improved the performance of the programme; particularly in relation to the smallholder sector. This underlines the commonality of interests in developing a domestic tea standard from state-based actors present within the GPN and the DPN.

4.4 NGOs

Solidaridad Asia is the primary NGO partner responsible for the implementation of Trustea. Solidaridad Asia is a newly formed NGO based in Delhi. It was created in 2010 as a result of the internal restructuring of the Dutch NGO Solidaridad, through which the organisation transitioned from a single NGO based out of Utrecht in the Netherlands into a series of national NGOs based in developing countries. Prior to this transformation, Solidaridad had played an important role in shaping the development of standards within the GPNs of global lead firms across many different sectors and was instrumental in the creation of Utz Certified as an MSI. Solidaridad has also supported the mainstreaming of other standards within European markets and has been particularly strong on supporting producers to meet certification through the provision of training programmes. As the growth of public-private partnerships emerged as a key characteristic of contemporary Dutch

development cooperation, Solidaridad has partnered with IDH and European lead firms in order to help create and implement sustainability programmes and standards within GPNs.

The creation of Solidaridad Asia allowed the NGO to gain a foothold in emerging markets. This in turn has facilitated the creation of new roundtables, standards and sustainability initiatives within South and South-East Asia. For the Indian tea industry, the creation of Solidaridad Asia has been particularly important given that the Regional Director had previously been an active member of Indian civil society; bringing in 'decades of knowledge' from previous work on standards in the Indian tea sector (Solidaridad 2011: 4). As plans to create a new standard for the Indian market developed, Solidaridad Asia was approached by Unilever and asked to develop a template for Trustea (which at that time was referred to as 'SustainabiliTEA'). The local knowledge and expertise within Solidaridad's Asian office allowed the members of the MSI to fully realise the commercial and institutional complexities of tea produced for the domestic market. Indeed, the majority of employees are Indian nationals and the NGO highlights the fact that solutions pioneered by Solidaridad are locally-led. Solidaridad Asia worked closely with the Head of Sustainability at Hindustan Unilever to create a code which reflected the realities of production for the local tea market. As such, Solidaridad Asia has led Solidaridad's engagement in Trustea from a local perspective, drawing on previous experiences within the sector.

The case of Solidaridad illustrates that NGOs have gone beyond the formation of strategic North-South alliances with local civil society partners to improve social standards. The growth of emerging markets and the strengthened case for developing local standards led Solidaridad to radically alter their organisational structure through the creation of regional centres in the global South. They relinquished their position and identity as a Dutch NGO to become a series of local NGOs within Asia, Africa and Latin America; connected through the identity of a common global policy space, and through their ability to attract Dutch funding. This process of regionalisation has become a central mechanism for Solidaridad to ensure their continued relevance in an era of polycentric trade.

5. Conclusion: The development of Southern standards in an era of polycentric trade

Changing geographies of trade and consumption, including the expansion of markets in emerging economies, raises important questions regarding the future direction of governance within production networks. While the proliferation of social standards for exports has been well documented, scholars had previously argued that the growth of consumption in the global South would likely lead to a “race to the bottom” for conditions of employment (Kaplinsky and Farooki, 2010). This was due to empirical evidence of poor enforcement of labour law; coupled with low capacity on the part of NGOs and other civil society members to push the private sector to develop new standards.

However, the recent introduction of Southern MSIs into domestic markets challenges these earlier claims and highlights the interest of firms, NGOs and state actors in creating new standards to regulate the social conditions of production within Southern markets. Whilst the impact of the introduction of Southern MSIs remains to be seen, their emergence certainly challenges earlier claims that local actors would not seek to create new forms of governance as a response to the changing characteristics of the market.

By analysing the case of Trustea, this paper illustrated that Southern MSIs are not always shaped exclusively by domestic or Southern factors, but may also be influenced by production network actors from other territories and scales. By illustrating the influence of polycentric trade (whereby actors are simultaneously participating in different networks oriented towards different end markets), this case analysis of Trustea has highlighted the role played by both Southern *and* Northern actors in the development of Southern standards. The case of Trustea illuminates the difficulty in analysing the development of MSIs in relation to the binary categories of North and South and instead illustrates the complex ways through which firms, state and civil society actors have transcended these boundaries. Figure 4 offers a visual representation of how these actors have

shaped the commercial and institutional dynamics of the GPN and the DPN through organisational linkages bridging the local and global tea markets.

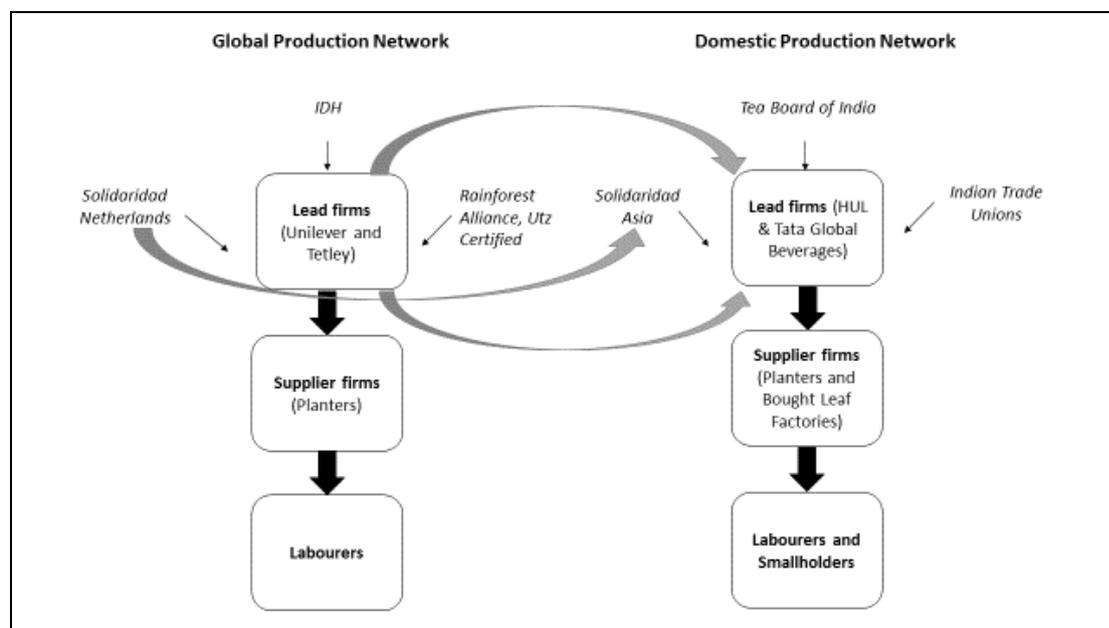


Figure 4 Commercial and Institutional Linkages across the GPN and DPN (Source: Author's Construction)

The origins of Trustea’s development are linked to a global agenda to scale up pre-existing standards within Southern markets, as illustrated in other empirical cases (Schleifer and Sun, 2018). However, there are also some important differences. The original impetus for the development of a domestic tea standard was driven by Unilever’s interest in certifying all markets in which it operated. This was to be achieved through the introduction of a global standard (i.e. Rainforest Alliance) into the local market. However, the case of goes beyond earlier findings by demonstrating that when insurmountable institutional differences are encountered, windows of opportunity to develop new, locally-embedded standards can emerge as a result of organisational linkages across multiple production networks. Given that Hindustan Unilever and Tata Global Beverages operated as domestic lead firms within the Indian tea market, they were well placed to cooperate with the Tea Board to create a ‘national’ tea standard to govern the sector. The subsequent incorporation of local initiatives previously led by state agencies (which facilitated the integration of local norms and rules into Trustea’s code of conduct) shaped Trustea’s discursive position as a locally-owned and managed

standard. In this respect, Trustea partially depended on differing sources of legitimacy as compared to Northern standards (Schouten and Bitzer 2015) and so Trustea emerged at the nexus of North and South; global and local.

The intersections between actors from the global North and global South within the shaping of Trustea challenges the assumption that Southern MSIs are being first and foremost shaped by Southern actors. For while Southern standards are generally understood as representing a 'reassertion' of public authority in the field of regulatory governance (Wijaya and Glasbergen, 2016), the case of Trustea indicates that local state agencies played a secondary role within its development, while firms and NGOs (linked organisationally across the GPN and the DPN) led the design and implementation of the MSI. The findings urge caution in assuming that the development of local standards governing domestic markets in the global South are necessarily separated from the actors and processes which have driven the development of standards for exports to Northern markets.

Analytically, the article has shown that this particular confluence of actors and interests was brought about as a result of the joint embeddedness of Trustea's core members within the GPN and the DPN of Indian tea production. This phenomenon occurred due to the complex organisational inter-linkages present within the core members of the MSI; whereby lead firms and civil society organisations emerged as 'hybrid' actors in an era of polycentric trade. These findings contribute to the current debate on the governance of production in an era of polycentric trade by demonstrating that the existence of different end markets for goods and services does not necessarily lead to the development of entirely separate institutions of governance and regulation.

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