This paper explores why a country might be the first to cooperate in a global prisoners’ dilemma. Theoretically, it emphasises people’s norm perceptions (of what others will support or condemn). If reformists see domestic and international support, they become optimistic, so invest heavily, thereby improving their prospects. This argument is developed by examining the drivers of potentially ground-breaking legislation. From 2018, large French firms must mitigate risks of environmental and human rights abuses in their global supply chains, or else be liable. This Bill – the world’s first of its kind – was vociferously contested by business associations. But French campaigners and politicians persisted. For four years they persisted, because they saw glimmers of hope. These include: growing international support for human rights due diligence; public outcry over the Rana Plaza factory collapse in Bangladesh; French scepticism of multinationals; French acceptance of state intervention as the mode of problem-solving; and a Socialist Government. Anticipation of success galvanised continued activism. Reformists in other European countries were more despondent, so settled for voluntary initiatives or weaker legislation. Key then, to tackling global collective action problems, is to shift norm perceptions about what others support, and provide credible reasons for hope.

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Introduction

This paper explores why a country might be the first to cooperate in a global prisoners’ dilemma. Globalisation has created a collective action problem. Because companies and their production networks are globally mobile, governments keep deregulating, to remain price competitive, attract investment, and secure contracts. Low-end supply chains (like garments) have become marked by intense cost competition, reselection, and unstable orders. These sourcing practices incentivise governments to resist workers’ demands for better rights, conditions, and pay (Bartley, 2018).

Extra-territorial liability for suppliers’ malpractices might incentivise buyers to source more judiciously: pursuing longer-term contracts with manufacturers in emerging economies with higher labour standards, and more autonomous labour movements. However, if a government ever proposed such legislation, domestic companies might threaten to relocate, to avoid being undercut by foreign competitors (without such liabilities). Fear of capital flight saps political support for legislation. Further, if governments and campaigners do not see peers reforming, they may not even consider reform. Instead they may follow the herd: despondently accepting self-regulation as the only game in town. Norm perceptions and self-interested concerns curb unilateral deviation. But inaction risks another Rana Plaza factory collapse (which killed over a thousand garment workers).

This paper examines a surprising case, bucking this global trend of neoliberal deregulation. It explores the political drivers of the world’s first law on extra-territorial liability for environmental, labour, and human rights abuses. France’s Duty of Vigilance Law (2017) mandates that large French firms1 mitigate such risks in their global production networks. They must develop and implement a vigilance plan, comprising: a risk map (which identifies, analyses, and prioritises risks relating to their subsidiaries, subcontractors, and suppliers); procedures to regularly assess risks; appropriate actions to mitigate risks; an alert mechanism (developed in partnership with the trade union representatives); monitoring and evaluation mechanisms. If a company does not establish, implement, or publish a vigilance plan, then victims, NGOs and trade unions can use civil litigation, to secure compensation for damages.

This potentially ground-breaking law was only passed after an acrimonious, four-year struggle. Campaigners persisted relentlessly because they saw glimmers of hope. These include: growing international support for human rights due diligence; public outcry over the Rana Plaza factory collapse in Bangladesh; French scepticism of multinationals; French acceptance of state intervention as the mode of problem-solving; and a Socialist Government. Anticipation of success galvanised continued activism, and increased the likelihood of success. At a higher level of abstraction, this paper connects the micro- and macro-drivers of political change by exploring how the broader political economy (i.e. international agreements, modes of national governance, culture, and short-term windows of opportunity) shape expectations, and encourage particular ventures. Empirically, this argument is derived from interviews with activists, civil servants, business, and politicians in six countries.

Theoretical Framework

This paper contributes to the rich literature on ideas, constructivism, and international norm dynamics, by drawing attention to people’s expectations (as shaped by the broader political economy). This theoretical move uniquely enables us to connect the micro and macro-drivers of political change.

Perhaps it is unsurprising that the first country to impose extra-territorial liability in global supply chains was France, with its history of state intervention. Economic governance is widely characterised as path dependent: ongoing institutional reforms are mediated by past norms and networks of coordination between government, firms, and labour (Bair and Palpacuer, 2012; Fransen and Burgoon, 2012; Gjølberg, 2009; Hall, 2007; Hancke et al, 2007; Toffel et al, 2015). But why? How does the past shape the future? By what mechanisms? To answer this question, scholarship on political change and continuity often emphasises macro-level phenomena: power, institutions, norms, and ideas. In this section, I will argue that

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1 Firms registered in France with either: more than 5,000 employees (working for the company and its direct or indirect French-registered subsidiaries); or more than 10,000 employees (working for the company, and its direct or indirect global subsidiaries).
further empirical evidence and theory are needed to articulate how these macro-structures influence people’s reasons for acting.

Studies on global production networks often conceptualise ‘power’ as an aggregate phenomenon. They detail the asymmetries and forms of power, i.e. ‘institutional power’, ‘associational power’, ‘social power’ (Arnold and Hess, forthcoming; Brookes, 2013; Hendersen et al, 2002; Macdonald and Macdonald, 2010; Ruggie, forthcoming). Lead firms are said to have ‘social power’, ‘market power’, and ‘political power’ (Phillips, 2017). But these macro-level descriptions are incomplete, for they do not tell us why individuals challenge or conform to prevailing power dynamics.

Similar questions can be raised about ‘social norms’ and ‘ideas’. Ideas are often construed as abstract phenomena, existing independently of individuals (Béland and Cox, 2016; Blyth, 1997; Gofas and Hay, 2010; Schmidt, 2016). Finnemore and Sikkink (2001) invoke ‘intersubjective beliefs, which are not reducible to individuals’. But they do not specify how this phenomenon actually influences people’s behaviour, motivates compliance, and perpetuates continuity. Nor do they explain the ontology of such phenomena. What are ideas and norms if not reducible to mental states? As Gofas and Hay (2010: 13) note, ‘the burgeoning literature on the role of ideas has tended to lack solid, coherent and explicitly stated theoretical underpinnings’. Further theoretical work is needed to clarify the metaphysics, and articulate causation, so we can explain why people challenge or conform to widespread practices.

To investigate the causes of socio-political change, I do not focus on the rise and fall of aggregate norms or abstract ideas, but rather people’s reasons for acting: their beliefs and desires (as called for by Berman, 2013; Goodwin et al, 1999; Jasper, 2010; Opp, 2009; Polletta, 1999; Vail, 2018). I encourage particular attention to individuals’ norm perceptions (their expectations of what peers will accept or abhor) (my term, but see also Bicchieri, 2017; Tankard and Paluck, 2016). By observing the world, people develop beliefs about what others will endorse or reject. If everyone else complies, actors assume collective approval. People only revise their norm perceptions when they witness behavioural change. For example, seeing successful revolution in neighbouring countries can raise expectations, embolden democrats, and catalyse further revolts (as in the 1848 revolutions and Arab Spring - Weyland, 2012). Conversely, witnessing unsuccessful strikes in neighbouring countries can curb morale, and thus motivation and participation (as in The Netherlands – Klandermans, 1984). But if they do not witness widespread critique, they assume deviation will be unsupported, so doubt the possibility of social change, and conform. This perpetuates path dependency. Norm perceptions (expectations of what peers will accept or abhor) thus create a collective action problem, requiring a large-scale and coordinated change in beliefs and behaviour (Bicchieri, 2017: 111).

‘Norm perceptions’ help us understand why private regulation persists despite well-documented inadequacies. If corporate accountability campaigners doubt wider support for legislation, they are unlikely to invest scarce resources in such endeavours. Instead, they may think it more prudent to improve existing private regulation, but inadvertently legitimise and reinforce this regime (Bartley, 2018). Even if activists do campaign for state intervention, they may settle for weak legislation when faced with concerted opposition – as occurred with the UK Modern Slavery Act (Le Baron and Rühmkorf, forthcoming). The aim of this paper is to explain why this did not happen in France.

‘Internalised ideologies’ are another kind of belief. These include people’s descriptive and normative beliefs about members of different groups: civil servants’ stereotypes of anti-sweatshop activists, whether they value them as knowledgeable interlocuters, or dismiss them as peripheral radicals. Internalised ideologies also shape how people process new information, diagnose problems, attribute culpability (e.g. for Rana Plaza), and develop policy solutions. These are the beliefs that individuals personally endorse, what they think is appropriate (rather than what they think others might accept). Most ideational scholarship deploys this approach. For example, Vail (2018: 11) argues that ‘distinctive elite understandings of the appropriate role of the state, the underlying structure of society, and the related character and focus of political responsibility have shaped patterns of social and economic adjustment in the neoliberal era’. Both Vail (2018) and Clift (2012) suggest that the French governing elite’s internalised ideologies (about the

\[2\] Though such optimism may be unfounded.
appropriate degree and direction of state intervention) influenced their objectives, their relationships with interest groups, and the kinds of policies they developed. Schmidt (2016:328) similarly emphasises internalised ideologies, and widely shared un critical assumptions about appropriate policy tools, when explaining the persistence of neoliberalism across Europe. However, national policy debates are not only mediated by widely-shared internalised ideologies, but also norm perceptions: expectations of what voters, party members, trade unions, business associations, and parliamentary executive will accept or abhor. Contrary to Schmidt, perhaps many people are privately critical of neoliberalism. But they despondently comply, as they presume everyone else is supportive, so think change impossible. We call this ‘pluralistic ignorance’. Curiously, most writing on ideas and social norms overlooks this dimension.

Internalised ideologies and norm perceptions are distinct phenomena, but alike in two respects. First, individuals form these beliefs through first-hand exposure, peers’ narratives, and media consumption – which are in turn mediated by long-standing socio-economic practices in their country. However, national homogeneity should not be presumed. By focusing on individuals’ (rather than aggregate) beliefs, we can allow for the possibility of ideological heterogeneity, debate, and dissent within each country. Second, beliefs exert an unconscious influence on behaviour: people are rarely aware of their stereotypes, assumptions, and norm perceptions.

People’s reasons for acting also include their ‘perceived interests’ – whatever they consider instrumental to satisfying their desires, e.g. for job security, business growth, campaign success, consumer satisfaction, re-election, or peer respect. If retailers bear no liabilities for their suppliers’ malpractices, and consumers prioritise low costs, retailers have no financial incentive to rethink their sourcing practices. If NGOs rely on corporate funding, they may be reluctant to campaign for stringent legislation. Alternatively, they may prioritise their policy goals, even if this jeopardises corporate funding. Thus conceptualised, interests are subjective. Their content cannot be assumed a priori. Perceived interests are also shaped by norm perceptions. If people think a project lacks wider support, and is likely to fail, they may be reluctant to invest. To understand people’s perceived interests, we need to undertake qualitative research, for they cannot be inferred from structural positions. Drawing on this theoretical framework, this paper explores how the wider political economy shapes expectations, and how these expectations influence campaigns for corporate accountability.

Methodology

Embarking upon this qualitative research (interviewing protagonists), I envisaged four methodological challenges: (1) participants’ depictions of the past may be influenced by recent developments, including legislative change; (2) participants might carefully curate their narratives, possibly over-emphasising their contributions; (3) French participants may not be consciously aware of their beliefs, or recognise the specificity of the French context, compared to elsewhere; (4) I might misinterpret their portrayals.

To address these challenges, I triangulated contemporary interviews with historical sources; interviewed participants from different sectors, different countries; and invited them to comment on earlier versions of this paper.

First, I created an amalgamated timeline of perspectives, debates, and conflicts. To this end, I searched France’s most popular news sites for references to ‘Rana Plaza’, ‘devoir de vigilance’, ‘multinationales’, and key actors. Once I had discovered journalists interested in this issue, I read more of their work. This was supplemented with publications, interviews, and press releases from key actors: business associations, politicians, and NGOs. I also followed debates in the National Assembly and Senate. I used this historical record to triangulate contemporary interviews.

Second, I interviewed 42 participants: representing business associations, trade unions, human rights advocates, environmentalists, lawyers, and politicians (of different leanings, and involvement). My goal was to understand their reasons for acting (their norm perceptions, internalised ideologies, and perceived interests), as shaped by the wider political economy, so as to ascertain the political drivers of legislative reform. This breadth of participants enabled me to triangulate diverse perspectives.
Third, to understand why France was the first country to introduce such legislation, I investigated why this has not happened elsewhere. To this end, I interviewed people from business, civil society, and government in Britain, Belgium, the Netherlands, Germany, and Switzerland\(^3\) – in 2016, 2017, and 2018. These countries are ideal comparisons as are similarly positioned, yet have taken different approaches to corporate accountability. (For reasons of space, this paper focuses on France, rather what happened elsewhere). I also observed activists’ gatherings, multi-stakeholder initiatives, and responsible business conferences. Then contextualised these narratives by engaging with wider research on comparative politics. Interviews were transcribed, coded, and names changed to preserve anonymity.

<table>
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<th>Business</th>
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Fourth, I shared my emergent hypothesis, and early drafts of this paper: inviting participants’ comments and corrections, to ensure accuracy and accountability.\(^4\)

**Obstacles to Corporate Accountability Legislation**

The Duty of Vigilance law was not inevitable. It was developed by a small, peripheral group of young, female activists, together with lawyers and left-wing deputies. Having tabled the bill in 2013, they lobbied for four, acrimonious years: through two readings in the National Assembly, two readings in the Senate, and then the Constitutional Court. They were vehemently opposed by business, disregarded by Government, and largely ignored by the public.

Business associations (the Movement of the Enterprises of France [MEDEF] and the French Association of Large Companies [AFEP]) strongly mobilised against the Bill. They argued that by unilaterally introducing such legislation, the Government penalised French businesses: jeopardising jobs, growth, and investment. European competitors were not subject to the same (potentially costly) liabilities. Further, the Bill only applies to companies domiciled in France, so might deter new investment. MEDEF and AFEP also expressed concerns that the wording was vague, liabilities untold, and the financial damages were far too onerous (AFEP, 2015; Le Figaro, 2016). Such resistance is likely in any country considering regulating unilaterally. British businesses similarly objected when the Government drafted a Modern Slavery Act (Le Baron and Rühmkorf, forthcoming).

French business associations discretely lobbied through established channels: harnessing long-standing ties and privileged access to key ministers, individual deputies, and senators. Camaraderie between business and Government is not unusual in France (Maclean et al, 2006; Jabko and Massoc, 2012: 10–11). The French state has long promoted ‘national champions’ (large firms), both domestically and internationally (Clift, 2012). Such closeness is epitomised by a letter to Macron, from the President of AFEP,

Dear Emmanuel,

This text is just unreasonable.

Friendship


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\(^3\) Other countries (like the U.S.A.) were excluded due to cost constraints.

\(^4\) Participants helped clarify key dynamics, but did not ask me to change any quotes.
Prime Minister Valls privately assured business leaders that the Bill would not pass (according to my informants). President Hollande was uninterested. Although he had campaigned on the left, Hollande did not always govern on the left (see also Parsons, 2015: 65; Roussel, 2014). The Duty of Vigilance bill did not have Cabinet support, at least not in the early years. Indeed, the French Ministry of Economy and Finance created a counter-proposal, heeding advice from MEDEF and AFEP.

*Part of the Government was pro-business... They were hysterical, and met ministers much more than us... Business was pitching their tent in the garden of the Government* [i.e. business benefitted from close ties and frequent interactions], explained one activist.

Deputies and senators raised worries about foreign competition (undercutting domestic firms); job losses; the unfairness of holding French businesses liable for malpractices committed by other actors in other jurisdictions; together with legal and constitutional uncertainties (Senat, 2017). For them, French companies already practised world-leading Corporate Social Responsibility, and should not be punished with harsh legislation. Instead, they espoused voluntary due diligence, in line with OECD guidance (ibid).

AFEP’s virulent resistance and Cabinet’s dismissal coloured deputies’ expectations. Many “[Socialist] deputies were pessimistic. They signed the petition [and were sympathetic], but not optimistic. Because of AFEP” – explained one politician (translated). Moreover, no other country had ever made companies liable for human rights, environmental and labour abuses in their global production networks. Anticipating failure, few politicians were keen to invest scarce resources in this forlorn hope.

Fifth, few politicians perceived this Bill as a vote winner. The public was largely uninterested: more troubled by *‘la vie quotidienne*: unemployment, a sluggish economy, terrorism, and immigration (Eurobarometer, 2018). Since 2012, France has struggled with low economic growth (below 1.2% GDP growth per annum), high unemployment (10%), and several terrorist attacks (The Economist, 2016). Working conditions in other countries were not a priority. This is reflected in low levels of ethical consumerism in France, compared to other European countries (Zorrel, 2016). Before Rana Plaza, NGOs’ campaigns and petitions for extra-territorial liability struggled to garner public support, with only a handful of signatories. Politicians’ norm perceptions – of public uninterest – curbed their support for the Bill (echoing a European trend).

While progressive reforms in global supply chains are often enabled by sustained and collaborative activism (Donaghey and Reinecke, 2018; McDonnell et al, 2015), this was unlikely to emerge in France. The Government hardly supports or solicits expertise from NGOs working on international development. They are peripheral to top-down, technocratic, state-led policy-making, not perceived as knowledgeable partners – unlike Germany, the Netherlands and UK (according to my interviews; see also Levy, 1999; SER, 2013; Vail, 2018). Nor have French NGOs enjoyed strong, collaborative relations with unions. Echoing a broader trend, they do not always share objectives or preferred modes of working (Havard and Sobczak, 2015). Unions may also resist NGO encroachment onto their turf (ibid). Recently, a major French union withdrew from a campaign against French retailers coordinated by the Clean Clothes Campaign (Bair and Palpacuer, 2012). French unions are also ideologically divided, and weakened by low union density (one of the lowest rates in Europe) (Howell, 2009; Levy, 1999; Parsons, 2015: 65). Moreover, while multi-stakeholder dialogue has promoted responsible business practices in the USA, UK, the Netherlands, and Germany, French capital-labour relations are undercut by animosity and distrust (Andolfatto and Labbé, 2006; Lux, 2015).

In brief, the dearth of comparable legislation in other countries generated a collective action problem, and thus vociferous business opposition. Further, many potentially supportive politicians were pessimistic, given state-business ties, Cabinet dismissal, public apathy, and union fragmentation. Norm perceptions in turn shaped perceived interests: for business strength, and re-election. Few businesses, voters, or politicians, perceived the Bill as serving their self-interest. The Law was not inevitable, it was only passed due to sustained activism – from civil society and politicians.
Enabling Environment

A small coalition of advocates relentlessly lobbied, ‘tirelessly pleaded’; over five years, ‘they never gave up on this text’.

To maintain popular support, politicians and campaigners need to invest strategically, in ‘winnable battles’ (to quote one activist). Had they been despondent, they might have given up in frustration; settled for weaker legislation (such as the UK’s Modern Slavery Act); or voluntary agreement (like the Dutch Agreement on Sustainable Garments and Textiles, the German Partnership for Sustainable Textiles, the Fair Labor Association, Marine Stewardship Council, Kimberley Process, and Accord on Fire and Building Safety in Bangladesh) (Bartley, 2018; Le Baron and Rühmkorf, forthcoming). In Switzerland, there is a campaign for mandatory human rights due diligence, but they have not called for companies to be liable for suppliers’ malpractices. As a key proponent explained,

‘A victim from Rana Plaza could not use the [proposed] legislation to litigate in Swiss civil law, only if you have a relationship with a Swiss company controlling a subsidiary. We had to limit a little bit… We had this impression we had to restrict this to make it feasible politically. Either go with the full programme [i.e. liability for suppliers, like the French Bill], and it would be killed, it would be killed in the egg. Even to convince the population, it would be difficult because business would be so much against it. But we think this current initiative is very manageable, feasible’.

So, to explain the passing of the French Law, we need to understand what raised campaigners’ expectations, and galvanised sustained mobilisation.

The remainder of this paper suggests six reasons why the law was introduced in France: progressive support for human rights due diligence in global supply chains; public horror at the Rana Plaza factory collapse in Bangladesh; widespread anticipation of state intervention; anti-globalisation sentiment; a Socialist majority in Government; and sustained activism (a civil society and left-wing political coalition).

1. Progressive Support for Human Rights Due Diligence and Extra-Territorial Liability

Many campaigners explained their initial optimism in the Duty of Vigilance Bill by referencing the global growth of commitments to human rights due diligence and responsible business practices. These include the United Nations Global Compact (2000); Dodd-Frank Act (2010); the United Nations Guiding Principles on Business and Human Rights (UNGPs, unanimously endorsed by the UN Human Rights Council in 2011); OECD Guidelines for Multinational Enterprises (revised in 2011); the International Labor Organisation’s Declaration of Principles; ISO 26000 standard on Social Responsibility (2011); the California Supply Chain Transparency Act (2010); the EU Timber Regulation, requiring due diligence (2013); EU Non-Financial Reporting (2014); the Swiss Coalition for Corporate Justice, calling for mandatory human rights due diligence (started in 2011, gaining 135,000 signatures); the UK Modern Slavery Act (2015); the Green Card initiative for mandatory human rights due diligence, supported by eight EU Member States (2016); and the proposed Dutch Law on Child Labour Due Diligence (adopted by Parliament in 2017).

Member states’ unanimous endorsement of the United Nations Guiding Principles signalled broad support for three tenets. First, states should protect human rights from abuses by third parties (including businesses), through appropriate policies (e.g. regulation). Second, corporations should respect human rights, by undertaking due diligence: pro-actively identifying and mitigating risks of abuses in their supply

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5 ‘NGOs and unions tirelessly pleaded, for several years, in favour of the duty of vigilance’ – noted Senator Didier Marie (Senat, 2017), as did Deputy Dominique Raimbourg (translated, Assembly Nationale, 2016b).

6 393 French companies had joined by May 2005, as urged by President Chirac (Arnal and Sobczak, 2007).
chains. Third, victims of abuse should have greater access to remedy. These principles gained acceptance through broad consultation, peer learning, participatory conferences, and high-level summits (see also Duval and Partiti, 2018; Ruggie, 2017). They are reinforced in the OECD Guidelines, and operationalised through National Action Plans.

These processes could have legitimised a voluntary approach. However, a handful of young, female French NGO activists interpreted these multilateral commitments as growing acceptance of human rights due diligence and extra-territorial liability. Strategically building on the UNGPs’ legitimacy, they jointly drafted a Duty of Vigilance bill (in 2012). This stipulated that French companies identify and mitigate risks of human rights abuses in their supply chains, or else be held criminally liable. They were determined, though not overly optimistic. Corporate accountability was not a priority for the general public, politicians, or even their own NGOs. Communications teams – concerned not to alienate more conservative supporters – cautioned them from being too critical of multinational companies. That changed in April 2013.

2. Perceived Crisis

The 1,134 deaths caused by the collapse of a textile factory at Rana Plaza triggered media attention and public alarm. It was a front-page horror story, across Europe. French brands were implicated, found in the rubble. Camaïeu and Auchan paid compensation to the victims, following NGO campaigning. Mainstream journalists (not just those on the left) drew a direct link between the catastrophe, globalisation, multinationals, and the dearth of adequate legislation (Le Figaro, 2013; 2014; Le Monde, 2015; Le Parisien, 2014; Le Point, 2015; La Tribune, 2015). Sustained coverage inculcated ideas of transnational liability, and raised expectations for legislation (as also observed by Simmonet, 2017).

The acceleration is really the Rana Plaza drama. In France it was really a big drama. For us, it is so terrible, we have to push quickly. Rana Plaza was covered by newspapers, petition of NGOs, film, documentary, a lot of people in a few days write in. A lot of MPs saw a lot of French citizens are shocked. A lot of the left side heard our proposal. We were really optimistic after Rana Plaza, because it's such a drama. It's an example of the problem. We think it's possible to propose the law’ – explained one politician.

'Rana Plaza was important for mobilisation. In Parliament there was a meeting with a lawyer from Dhaka, very bright, 300 people invited, present, interested, and for the group [of campaigners] it was very encouraging’ – detailed a lawyer.

But Rana Plaza did not entail legislation in France, or elsewhere. Immediately, the Socialist Minister of Foreign Trade (Nicole Bricq) asked the National Contact Point to domesticate the OECD Guidelines for Multinational Enterprises. They recommended that companies (voluntarily) undertake due diligence, reduce their number of suppliers, procure independent audits, and support industrial democracy. Bricq endorsed all their recommendations (Guillemoles, 2014). That could have been it.

Dutch, German, and Swiss parliamentarians were also appalled by Rana Plaza, and triggering wider debates about business and human rights in global supply chains. But still they pursued voluntary, multi-stakeholder agreements (SER, 2016; PST, 2018). NGOs and unions participate, even though they see these as imperfect. Business and human rights campaigners within NGOs struggled to secure organisational support for this endeavour (see also Oxfam, 2016; Preuss et al, 2015: 75). What was different in France, that evoked such strong reactions, and heightened expectations for legislation?

3. Widespread Scepticism about Globalisation and Multinationals

7 Mathilde Dupre (CCFD-Terre Solidaire, a Catholic Socialist NGO); Sabine Gagnier (Amnesty International France, focusing on human rights); Nayla Ajaltouni (le Collectif Éthique sur l’étiquette, specifically tackling working conditions in global supply chains);), and Juliette Renaud (ls Amis de la Terre, Friends of the Earth); and Sandra Cossart (Sherpa, which litigates economic crimes).

French people could have disregarded Rana Plaza: dismissed it as a Bangladeshi problem (emanating from regulatory capture and corruption); cherished fast fashion; accepted multinationals’ denials of culpability; and scapegoated a few, unscrupulous outliers. To understand why this event generated such visceral critique, we need to recognise confirmation bias, and pre-existing distrust of multinationals in France.

Scepticism about globalisation and multinational companies is widespread in France, compared to other European countries. In a nationally representative survey just before Rana Plaza, 65% of French respondents identified globalisation as a threat – compared to 25% in the Netherlands, 36% in Germany, and 37% in the United Kingdom (Eurobarometer, 2018). Only 44% of French respondents agreed that globalisation is an opportunity for economic growth (ibid). These trends are fairly stable over the past decade, and associated with grave concerns about high unemployment (ibid). Multinationals are often accused of ‘social dumping’: off-shoring jobs to countries that undercut French labour standards [insert reference]. Responses vary with questions posed, but whatever the wording, scepticism always appears highest in France. In 2014, only 14% of French respondents affirmed that trade increases wages, and only 24% declared that it creates jobs (Table 1).

**Table 1: Public Scepticism about Globalisation, 2014**

![Graph showing public scepticism about globalisation in 2014](image)

(Pew Research Centre, 2014: 16)

These concerns about globalisation have been publicly expressed in best-selling books, media headlines, political statements, and public protests (Gordon and Meunier, 2004; Waters, 2012). 150'000 people demonstrated at the European Social Forum in Paris, according to organisers (della Porta, 2009). 200'000 gathered in Larzac to protest against globalisation in 2003 (Meunier, 2004). Heeding such concerns, the Government has also sought to tackle social dumping. Centre-right Prime Ministers Balladur and Juppé pushed for a ‘social clause’ at the EU and WTO, to link trade and labour standards (though was opposed by Germany, the United Kingdom, and developing countries) (Orbie et al, 2005). The Government also sought to manage globalisation by taxing international financial transactions (2012).
I suggest that these pre-existing beliefs (widespread distrust of multinationals and globalisation) influenced NGO campaigns, newspaper coverage, and public interpretations of Rana Plaza. French people may have been more receptive to NGOs’ pejorative narratives, of multinationals’ malpractice and impunity. This is because people tend to seek, interpret, and remember information that confirms their existing beliefs. This is well-established by social psychology research (Nickerson, 1998; Taber and Lodge, 2006). Confirmation bias can be powerful: it influences how people process information, and their expectations of how others will process information.

Earlier demonstrations and discourses in favour of managed globalisation may have influenced people’s expectations. Journalists, campaigners, and politicians may have anticipated widespread concerns about corporate impunity, and so tapped into these sentiments, providing a more critical narrative. Even in La Croix (2017, a centrist, Catholic publication), readers hear that, ‘Rana Plaza [is] a symbol of wild globalisation… this tragedy is synonymous with a globalization without any other law than that of profit at any price, even contempt for the lives of employees’ [translated]. Such condemnation is hard to find in other European newspapers, even those on the centre-left (such as the Guardian and Süddeutsche Zeitung).

In sum, many French people are sceptical of multinationals and globalisation (relative to their continental peers). Accordingly, they may have been more receptive to campaigners’ critical narratives: blaming brands, calling for legislation. Moreover, because resistance to globalisation is well-publicised in France, activists may have anticipated a sympathetic response.

4. **Anticipation of State Intervention**

Even if campaigners were emboldened by public outrage, and growing support for reform, they need not have pursued legislation. This section explores how long-standing acceptance of state intervention may have influenced their expectations of broadly acceptable solutions.

Interactions between French businesses and labour are often acrimonious, undercut by animosity and suspicion (Andolfatto and Labbé, 2006; Balsiger, 2018; Lux, 2015). Such confrontation is partly a consequence of the closed political system: the French state seldom facilitates inclusion or dialogue between diverse stakeholders. The elite business community is also strong and cohesive: interlocking directorates create stakes in peer companies (Heemskerk, 2011; Maclean et al, 2006). For example, when the French Clean Clothes Campaign graded businesses’ social performance in the early 2000s, businesses did not try...
to outdo each other. Instead, they jointly rejected and delegitimised the rankings (Balsiger, 2018). This adversarial, unsatisfactory history colours norm perceptions.

By contrast, Dutch, German, and UK governments have developed multi-stakeholder partnerships, in collaboration with NGOs, unions, and firms.9 This does not necessarily reflect lesser concern for labour abuses,10 but rather shared expectations that problems can be solved through co-operative, group-based, tripartite policy-making (Andeweg and Irwin, 2014; Bair and Palpacuer, 2012; Hemerjck et al, 2000; Hendriks, 2011, Prak and Van Zanden, 2013; Touwen, 2014; Vail, 2018). Meanwhile, French activists did not consider multi-stakeholder initiatives as a workable solution:

*No. For me, [mandating a duty of vigilance] is something we’ve been forced to attend, like the National Platform on CSR, and OECD… The state has abandoned its regulatory power. And we’ve wasted so much time and energy. It’s just time-consuming.*11

A further contrast is that other European activists were much more sceptical about the possibility of legislation. Many informants were privately critical of dialogue, but saw it as second best, and so engaged. Whereas French campaigners thought wider support was possible. I suggest this optimism emanates from France’s history of dirigisme.

State intervention is the widely-accepted and anticipated mode of problem-solving in France (Blasco and Zolner, 2010; Clift, 2012b; Howell, 2009: 251; Vail, 2018). “Left-Right differences don’t matter. The French think that the only way to reform is through the state” – declared Dennis Kessler, Vice-Chairman of MEDEF (cited in Vail, 2018:96). Dirigisme has receded with three decades of liberalisation, privatisation, deregulation, and employer discretion (Baccaro and Howell, 2017; 197; Hall, 2006: 21; Howell, 2009: 231, 249–53). But the French state still plays a facilitative role: resolving collective action problems and institutionalising reforms (Clift, 2012; Vail, 2018). Seeing this, many people look to the state ‘as the guardian of Republican values’ (Goyer and Glatzer, 2016). By contrast, business solutions are often eyed with suspicion (Blasco and Zolner, 2010). As Antal and Sobczak (2007: 14) observe,

*The long-standing tradition of centralized power and faith in changing society via legislation in France is one factor behind the acceptance of what in other cultures would be seen as intolerable state interventionism.*

The French state has also played a central role in propelling and legitimising Corporate Social Responsibility (CSR) reforms: mandating CSR reporting in 1977 (Bilan Social), then adding more indicators in 2001 (Nouvelles Regulations Economiques). Parliament later adopted the Grenelle Acts (2009 and 2010), increasing the range and rigor of extra-financial reporting required.

That state intervention is widely accepted, and anticipated, as the mode of problem-solving in France, gave hope for the Duty of Vigilance bill. Because activists believed that their compatriots would accept this bill, they invested their time and resources in the campaign, notwithstanding repeated setbacks. As one interviewed law professor explained:

*Claude: This law [mandating a duty of vigilance], it’s not a surprise for French people. We have the habit. It’s in the political culture*…

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9 These include the Netherlands Agreement on Sustainable Garments and Textiles, the German Partnership for Sustainable Textiles, the UK Ethical Trading Initiative, and Extractive Industries Transparency Initiative.

10 Indeed, it was Dutch and British activists that first protested against labour abuses in their global supply chains, founding the Clean Clothes Campaign in 1989 (Bair and Palpacuer, 2012). The Government has promoted these ideas both domestically and in its foreign policy. The school curriculum includes sustainable development and corporate social responsibility (LVDO, 2008). The Netherlands was also one of the first countries to domesticate the UNGPs, publishing its NAP in 2014. The Dutch Government also prioritised business and human rights during its 2016 EU Presidency: organising a pan-European, multi-stakeholder conference (ECJ et al, 2016; Ministry of Foreign Affairs, 2016). From 2014, the Dutch Government convened multi-stakeholder processes to develop sector-specific agreements in high risk global value chains (starting with garments - SER, 2016).

11 NGOs and unions did request a ‘National Platform for Global Actions for Corporate Social Responsibility’ (a multi-stakeholder platform, first convened in 2012). But – according to my informants – this was primarily to enhance access to government ministries, rather than try to resolve grievances through constructive discussions with business. Relations were tense.
Campaigners tapped into this broadly-shared anticipation of state intervention for the common good, in their media framing:

“The NGOs are there to remind the State that it is up to him to work for the common good and that companies, in a permanent way of profit, are not able to regulate themselves… Multinationals are not captured by the law. Subsidiaries of French companies may commit offenses with total impunity. There is no mechanism to empower parent companies”, Carole Peychaud (coordinator of the Citizen Forum for Corporate Social Responsibility, quoted in Reporterre, 2016, translated).

Others argued that the law restored state power, hitherto weakened by globalisation (Alternatives Economiques, 2017). This framing addresses a common concern in France: that the state (fundamental to national identity) has been eroded by global economic integration (Meunier, 2004).

Thus, while Varieties of Capitalism research explains path dependency by emphasising macro-level phenomena (norms and networks of coordination between government, firms, and labour), I suggest we focus on individuals’ internalised ideologies and norm perceptions (as developed by observing wider processes). Their expectations (of what others will support or censure) influence their ventures, thereby reinforcing path dependency. Connecting the macro to the micro and back again to the macro is crucial here.

But I should clarify, the Duty of Vigilance law is not state intervention of the Gaullist tradition: i.e. control through regulation, directives, or state ownership. The grievance mechanism is the law court: the onus is on victims to press their concerns, which some activists consider an abdication of state responsibility.

5. A Socialist Majority

The Varieties of Capitalism literature maintains that country responses to globalisation are mediated by non-partisan norms and networks of coordination between firms, labour, and government (see Baccaro and Howell, 2017: 183; and Vail, 2018 on commonalities between Socialist and Gaullist governments in France). But perhaps political parties exert an under-recognised influence?

For while there was broad acceptance of state intervention, scepticism of multinationals, and concern for Rana Plaza, left-wing attitudes are far from universal. Many French people have voted for political parties that intervene to support (rather than impose liabilities upon) ‘national champions’ (Clift, 2012; Jabko and Massoc, 2012). Right-wing parties held legislative majorities in France from 2002 to 2012. Had they been in Government post-Rana Plaza, they would have likely dismissed a Bill on extra-territorial liability.

From 2012, the Socialist Party held the Presidency (under François Hollande), Parliament, Senate, and majority of regions (Kuhn, 2014). Leftist parties had been swept to power after waves of street protests – against austerity, unemployment, inequality, pro-business responses to the Great Recession, and Sarkozy’s coziness with the wealthy elite (Béroud and Yon, 2012: 170; Hewlett, 2012; Lux, 2015). In his presidential campaign, Francois Hollande promised a renewal of social democracy (Parsons, 2015). This sparked hopes among leftist civil society.

Interviewed activists repeatedly emphasised this ‘five year window’. They perceived the Socialists as sympathetic (relative to previous administrations). Such expectations are implicit in media coverage: ‘[this is] ‘a race against the clock… The presidential election is approaching and it will clearly no longer be a priority. We are in a situation where we are working with the deputies and the government to advance the procedure, the culmination of which is one of François Hollande’s campaign promises’ (Carole Peychaud, activist, quoted in Reporterre, 2017, translated). This unique opportunity galvanised rapid, concerted investment from a broad range of campaigners.
Few socially democratic parties were in power in Europe after Rana Plaza. France was unusual. When I interviewed activists in Belgium, Britain, and Germany, they often declared that ‘legislation is impossible with this parliament’, and that ‘we always knew with a conservative government, we wouldn’t get legislation’. These expectations are perhaps accurate. The UK Conservative Government rejected calls for legislation, made by the Joint Special Committee on Human Rights (2017a; 2017b). That said, the Conservative party could reject calls for legislation without jeopardising its popularity or tarring itself as ‘the nasty party’ because this issue is not politicised, since there is no concerted push for reform from civil society. That was not the case in France.

6. **Sustained Activism, through a civil society, academic, and left-wing political coalition**

With their expectations raised, a small group of activists prepared a bill on the Duty of Vigilance. This section charts their campaign.

The bill was originally developed by a handful of young, female NGO workers. They had collaborated since 2004, jointly reviewing the OECD National Contact Point, and National Action Plan, under *Le Forum Citoyen de la Responsabilité Sociale* (see also Sobczak and Havard, 2012). They had also run several joint campaigns, calling for binding regulation. Through working together, seeing each others’ expertise, energy, and dedication, they came to trust each other, anticipating mutual commitment. Seeking to build on the UNGPs’ legitimacy, they developed a working group on parent company liability, and drafted a Duty of Vigilance bill in 2011.

Their campaign was strengthened by diversity and breadth. Environmental, human rights, international NGOs, Catholic socialists, legal justice advocates, academics, and trade unions harnessed their expertise, resources, networks, constituencies, and legitimacy. ‘Everyone came with their own strengths’ – explained a unionist. The NGOs were energetic, imaginative campaigners, creating comic, inflammatory videos and petitions, mobilising grassroot volunteers, who lobbied deputies. Amnesty’s involvement strengthened their legitimacy: it was not just a little, peripheral, radical or militant French NGO but a major international organisation, with gravitas. ‘The NGO work was very important: raising the issue, lobbying, with conviction and expertise, creating petition’ – explained one Senator. The breadth of organisations enabled them to mobilise different constituencies – such as the Catholic Socialist supporters of CCFD. Union involvement further enhanced their legitimacy, especially in the eyes of the Socialist Party (historically allied with the French Democratic Confederation of Labour, CFDT). CFDT’s General Secretary signed open letters, participated in breakfasts with MPs, and facilitated meetings with ministers. Given their links to the Socialist Party, union involvement also gave hope to NGO activists. They trusted each others’ commitment, but gave each other autonomy, to pursue parallel initiatives and campaigns, without need for universal agreement.

To secure legislative support, national campaigners and local activists wrote to all candidates in 2012 (before Rana Plaza). Hollande pledged support, along with over 70 deputies elected to the national assembly:

> I hope that the principles of the responsibility of the parent companies for the actions of their overseas subsidiaries be translated into law when they cause environmental and health damage [translated, April 2012].

Encouraged by such commitments, activists set to work: engaging with sympathetic legislators. ‘The NGOs were very motivated, they were very happy to find THREE deputies who wanted to talk about it’ – laughed one politician [translated]. These three, passionate deputies were Danielle Auroi (Green, President of the European Affairs Commission), Philippe Nogues (Socialist, President of the National Assembly’s CSR Study Group, CFDT, CPT, as well as academics and lawyers.

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12 These include Amis de la Terre’s 2009 campaign "Profits réels, Responsabilités artificielles" (supported by FCRSE and ECCJ); and the 2010 the campaign "Des droits pour tous, des règles pour les multinationales" coordinated by the CRID network and FCRSE (which comprises CCFD, Amis de la Terre, Peuples Solidaires among others).

13 Key actors included Sherpa, CCFD-Terre Solidaire, Amnesty International, the Collectif Éthique sur l'étiquette, Peuples Solidaires, Les Amis de la Terre France, CFDT, CPT, as well as academics and lawyers.

14 This is a growing trend in France: unions have broadened their coalitions to leverage impact (Milner and Mutters, 2013).
and Dominique Potier (a Socialist, close to CCFD, a Catholic Socialist NGO). Each had long-standing concern for global justice. They developed a cross-party coalition.

They tabled their bills in November 2013. Many Socialist deputies were broadly sympathetic: seeing it as a ‘marker of the left’ [translated], but were not terribly engaged. Cabinet was largely uninterested. The Minister of the Economy, Emmanuel Macron, had no time to meet with campaigners. It was only in January 2015 that the proposal was finally debated in the National Assembly. After initial discussions, Dominique Pottier proposed a second, weaker version of the bill: only applying to large companies; reversing the burden of proof (requiring claimants to prove wrong-doing); and replacing criminal liability with a civil fine. It was approved at its first reading in the National Assembly (March 2015); and went on for a first reading in the Senate, where it was rejected (November 2015); so went back for Committee Work; then onto a second reading in the National Assembly (which reinstates articles and approves the bill in March 2016); then a second reading in the Senate (with pro-business amendments, October 2016); then a Joint Commission; and back to National Assembly (November 2016); only to be rejected by the Senate (February 2017). It was consistently rejected by the Senate, which had a right-wing majority.

Throughout this turbulent process, business associations (MEDEF and AFEP) lobbied vociferously. They expressed grave concerns to deputies and ministers: the bill was too vast, legally vague, with huge liabilities, hurting French companies, thwarting their international competitiveness, risking capital flight (AFEP, 2015; Figaro, 2016).

Activists tried to galvanise support for the Bill by publicising atrocities (such as Rana Plaza, the Tazreen factory fire, oil spills in Ogoniland, as well as forced labour in Thai fisheries, and West African cocoa farms – Le Figaro, 2015; Novethic, 2016); collaborating with journalists, lawyers, academics, deputies, and MEPs; organising public events; designing humorous videos (such as Amnesty, 2014); launching polls and petitions: engaging the public, and signalling broad support for corporate accountability.

15 The Socialists and Ecologists separately tabled identical bills.
Organised by Friends of the Earth France, the 2015 Pinocchio Climate Awards called on the public to vote for the companies with the worst track record of adverse lobbying, environmental abuse, and greenwashing. 43,000 people participated.16

Their joint petition garnered 183,000 signatures (Avaaz, 2018; Sherpa, 2015).17 By showcasing public support, they tried to shift politicians’ norm perceptions about voters’ concerns:

For politicians, international issues don’t seem like priorities. So, it’s very important to get real people to put pressure on them to do something about it. We created a petition, and polls, to show public support, to convey the sense that the public cared about it – explained one interviewed activist.

16 https://www.prix-pinocchio.org/
17 By contrast, only 23,000 people signed Oxfam Deutschland’s (2018) petition for mandatory due diligence.
Careful framing was used to address countervailing interests and norm perceptions. First, advocates portrayed the bill as domesticking EU, UN, OECD, and ILO commitments (National Assembly 2016; Senate, 2015; 2017). Second, campaigners highlighted the growth of legislation in global supply chains: the UK Modern Slavery Act; the EU Non-Financial Reporting Directive; the Dutch Agreements on Sustainable Textiles, and Banking; as well as their proposed Law on Child Labour Due Diligence (National Assembly 2016i; Senate, 2015; 2017). By shifting norm perceptions, they sought to placate self-interested concerns about French businesses becoming less competitive. In reality, other laws are typically weaker and narrower in scope. Third, politicians presented the bill as preventive: undertaking human rights due diligence would reduce the risk of costly disasters, and restore confidence in companies (National Assembly, 2016b; Senate, 2017). Fourth, they argued that since many French companies are already undertaking due diligence, legislation would ensure a level playing field, so that ethical firms would not be undercut (National Assembly, 2016a).

Besides these self-interested appeals, Dominique Potier (Socialist MP and rapporteur on the bill) made grand, historical, emotive speeches, invoking Republican values. He rallied deputies who feared the Left had lost its way, as President Hollande’s ratings plummeted.

[translated] (National Assembly, 2016b; Minister Michel Sapin, Senators Didier Marie and Jacques Bigot marshalled similar arguments – ibid; Senate, 2015).

Despite this emotive rhetoric, Cabinet remained uninterested. The bill was not a priority. That changed in August 2016, when Macron left his ministerial post to work on his presidential campaign. He was replaced by Michel Sapin, who became a key advocate, putting the bill back onto the legislative agenda. This intervention was likely for party political reasons: to placate left-wing Socialist deputies, who felt their party had lost its way, and were greatly aggrieved by the fiercely contested, pro-business El Khomri law (2016).
Suddenly, change was possible. Dominique Potier and allied campaigners seized this opportunity: labouring through the night, trusting each other, finessing iterations of the Bill, shuttling backwards and forwards to ministries, checking revisions with lawyers: compromising to secure government approval, while trying not to weaken its force. There were only a few short months before the elections. With less than a week before the close of parliament, the Bill was adopted. As a final move of resistance, 120 right-wing legislators appealed to the Constitutional Council (France’s highest court). The Council removed the €10 to €30 million civil fine, but upheld key tenets of the Bill: mandating that large companies establish, implement, or publish a vigilance plan to prevent human rights violations and environmental damage caused by their activities, as well as their subsidiaries and suppliers. If they fail, interested parties (victims, NGOs and trade unions) can ask judicial authorities to order this. Interested parties can also use civil litigation, to secure compensation for damages (for technical details of the ruling see Brabant and Savoure, 2017).

Conclusion

Global production networks are marred by a collective action problem. This could be partly addressed by stronger corporate accountability for human rights abuses and environmental degradation. But rich country governments are reluctant to impose such legislation unilaterally – given business opposition, fears of relocation, and limited public concern. Accordingly, they have preferred to deregulate, and provide incentives to business. France has bucked this trend: mandating that large companies mitigate risks of human rights abuses, or else be liable. This paper has explored the macro-micro drivers of this surprising legislation.

This Law was not inevitable. Obstacles were overcome by sustained lobbying from politicians and activists. To explain the success of their campaign, one might highlight particular characteristics: a broad coalition; committed politicians; creative public engagement; strategic framing; and a window created by coincidental, internal dynamics within the Socialist Party (discontent from the Left, loss of confidence, low morale, and an existential crisis of identity). But this explanation is incomplete, because it presupposes relentless motivation and investment (which did not occur earlier, nor in other European countries).

A coalition of activists, unionists, and politicians heavily invested in a five year campaign for corporate accountability because they saw glimmers of hope. Their norm perceptions were influenced by: (1) progressive support for human rights due diligence; (2) public outcry over Rana Plaza (a crisis of legitimacy); (3) widespread scepticism about globalisation; (4) broad acceptance of state intervention; (5) a socially democratic government; (6) a growing alliance of activists, unionists, lawyers, and academics. These factors did not entail the law would be passed, they merely created an enabling environment, raised expectations, which in turn galvanised continued mobilisation. Organisations were more inclined to see this as a winnable project, and invest. Hope fuelled their ‘marathon’ (as activists frequently termed the campaign). Sustained activism enabled legislative change, with three qualifiers: internal party politics enabled a window of opportunity; the original bill was watered down; and impact is contingent upon enforcement, i.e. case law.

There are parallels here with other global collective action problems, such as transnational bribery. For a long time, governments were reluctant to impose legislation. No country wanted to unilaterally criminalise the bribery of foreign officials, as it would undermine their comparative advantage. But many governments have since imposed strict legislation. This global shift echoes many of the dynamics detailed in this paper.
We realise the importance of: public outrage (e.g. post-Watergate, BAE Systems cover-up); businesses’ ensuing loss of legitimacy; activism (from Transparency International and others); centre-left governments (Carter, Blair, Hollande); and international support for reform (i.e. the OECD Anti-Bribery Convention). US businesses initially lobbied against the Foreign and Corrupt Practices Act, but once they realised it was permanent, they changed tack: lobbying for multilateral reform, and prosecuting foreign companies (George, 2000; Gutterman, 2015). As more countries criminalise transnational bribery, norm perceptions shift. It becomes globally expected, and so centre-right governments also introduce legislation (as in Australia and Germany). But the way governments selectively engage with these international expectations is always mediated by their perceived interests and norm perceptions (as Lang, 2017 demonstrates in the case of China). There is a mutually reinforcing process, at national and international levels – like business and human rights.

Reflecting more broadly then, we see three key drivers of reform, which may apply to other global collective action problems (bribery, human rights, climate change, migration, and tax harmonisation):

1. **Broad, inclusive consultations** (within the EU, UN, and OECD); followed by multilateral commitments, help secure and signal widespread support; legitimising reform;
2. **Domestic coalitions**: reformists push for regulation, to domesticate international commitments iff their norm perceptions are raised by a combination of long-term, contextual factors (i.e. dispositions towards state intervention, and globalisation); and short-term factors (public outrage and sympathetic governments);
3. **Seeing neighbouring countries introduce legislation can shift norm perceptions**: embolden reformists; normalise legislative change; and also lessen business concerns about foreign competition; thereby creating a positive feedback loop.

Theoretically, I have departed from the broader political science literature. I suggest that macro-level phenomena (norms, networks, institutions, power relations) are not causative. They are merely aggregations. Nor is it helpful to refer to ‘international norm dynamics’, ‘contagion’, ‘cascade’, or ‘diffusion’ (evoking clouds floating overhead). To explain political change and continuity, we need to understand people’s reasons for acting: their perceived interests, internalised ideologies, and norm perceptions. By presenting a cross-national comparison, this paper reveals how historical processes shape expectations of what others will support or censure; activism; and corporate accountability reforms in different countries. This complements earlier analyses of how political, economic, and demographic shifts can raise hopes for reform and galvanise mobilisation.18 By focusing on individuals’ norm perceptions (and their macro-level influences), this paper offers a novel way of understanding political change and continuity.

Key then, to tackling global collective action problems, is to shift norm perceptions about what others support, and provide credible reasons for hope.

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18 For example, the 1979 Iranian Revolution and black civil rights movement in the U.S.A. (Kurzman, 1999; McAdam, 2004; Meyer and Minkoff, 2004). See also Klandermans (1984) on expectations of success, and whether others will participate.

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