

When does solidarity end?

Transnational solidarity during and after the crisis – the GM/Opel case revisited

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Abstract

The General Motors Europe (GME) case stands out not only for its intense transnational employee cooperation over a period of more than ten years but also for its impact on industrial relations research. The GME case provides an example of labour solidarity across borders that has been investigated from many different theoretical perspectives such as macro-structural approaches (Anner et al., 2006; Banyuls and Haipeter, 2010), rational-choice based interest theory (Bernaciak, 2010, 2013) and process-oriented concepts of identity work (Greer and Hauptmeier, 2008, 2012). Yet all of these different theories support the assumption that the 'national turn' of trade union politics during the crisis has eroded transnational solidarity and mutual trust relations. In this paper we suggest to disentangle trade union behaviour and their normative and cultural-cognitive orientations and to develop a more differentiated perspective on transnational solidarity of trade unions. The hypothesis is that a decline in transnational cooperation does not necessarily mean that mutual trust relationships and norms of solidarity

have ceased to be influential or were disrupted. We draw on concepts of sociological Neo-Institutionalism (Friedland and Alford, 1991; Scott, 2008; Zietsma and Lawrence, 2010) to evaluate two questions: 1) What determines trade union strategic behaviour towards labour transnationalism? 2) Are norms and shared understandings of cross-border solidarity (still) intact and impact upon the social behaviour of trade union actors, or not? Empirical evidence from two automobile companies (GM/Opel and Volkswagen) and their company locations in the UK and Germany is used to investigate the conditions under which transnational solidarity actually occurs and prevails. One conclusion is that existing transnational solidarity in both companies has not come to an end and could contribute to repertoires of contention (Tilly, 2006) in future labour conflicts.

Keywords

Labour transnationalism, motor industry, neo-institutional theory, trade union strategies

Introduction

While European and global markets expand, and regulations have been removed to enable capital and labour to move freely within the European Union, transnational collective action of national trade unions is still an exception rather than a rule. The successful cases of cross-national labour cooperation in Europe have been primarily built out from strong local and national positions (Anner et al., 2006: 8). Labour transnationalism has been based either on stable, firm-centred transnational relationships around European Works Councils (EWCs), on trade unions with high density-rates and mobilising capacities (European Action Days) or on labour representatives with a strong pattern-setting position in national and sectoral wage bargaining (Pernicka and Glassner, 2014). Following the geographic expansion of product markets trade unions would sooner or later expand their scope of activities to regain control over labour markets, Commons (1909) argued more than one hundred years ago. Yet this assumption contrasts with research findings; a large number of national and local unions have barely attempted nor succeeded in developing transnational institutions of cooperation. Besides intensified international competitive pressures, scholars have therefore put their emphasis on 'opportunity structures' (Tarrow, 1994, 2001; Turner 1996; Anner et al., 2006; Bernaciak, 2010, 2013) to explain the domestic and international strategies of labour actors. Supportive structures such as the EWC Directive or access to national, European and global infrastructures and political power provide structural opportunities for transnational trade union action. As structures do not fully explain social behaviour, actor-centred approaches have been developed to complement structural accounts. These approaches focus on the role of union leaders who might facilitate labour transnationalism. In adopting theoretical insights of the broader social movement literature (Snow and McAdam, 2000) to explain successful cases of labour transnationalism, Greer and Hauptmeier (2012: 281) developed the notion of 'identity work' that

refers to processes through which a collective identity, common understandings of issues at stake, shared norms and goals are created, sustained and modified. As has been convincingly demonstrated by the case of General Motors Europe (GME), trade unions and EWCs are able to introduce and sustain principles of solidarity and cooperation even within highly competitive environments. The sustainability of the transnational cooperation of labour in GME is thus explained by both, supportive macro-institutional structures in Europe and human agency at micro-social level that involves continuous face-to-face exchange and trust building. Yet, in contrast to the determinants of labour transnationalism that have been widely discussed it is still an open question under what conditions established norms and belief systems can be sustained, even in times of crisis. And if these norms and practices of solidarity and cooperation remain intact, what effects do they have on the behaviour and orientation of trade union and EWC actors?

In this paper we call into question the widely accepted perception that the 'national turn' of trade union politics during the crisis has eroded transnational solidarity and mutual trust relations in GME (Bernaciak, 2013; Hertwig et al. 2013). In order to develop a more differentiated perspective on transnational solidarity of trade unions and European Works Councils, we suggest disentangling the behaviour and orientations of actors. The hypothesis is that a decline in observable transnational cooperation does not necessarily mean that mutual trust relationships and norms of solidarity have ceased to be influential or were disrupted. The paper adopts an 'institutional logics perspective' (Friedland and Alford, 1991; Thornton and Occasio, 2008) because of the intriguing possibilities it offers to theorise and empirically study how institutions as broader belief systems shape the behaviour and cognition of individual and collective actors. Rejecting both, individualistic, rational choice theories and macro-structural perspectives, Friedland and Alford (1991) posited that every institution in society (such as the

market, communities) has a central logic. Institutional logics represent frames of reference that condition actors' choices for sense making, the vocabulary they use to motivate action, and their sense of self and identity (Thornton et al., 2012: 2). From an institutional logics perspective, international competition and transnational collective action are based on two possible institutional logics (market logic and logic of cooperation) in fields of industrial relations. Furthermore, market logic and the logic of transnational cooperation imply different patterns of material distribution of resources and incomes. Thus, conflicts between business and labour as well as within (organised) labour are expected to arise over both symbolic (institutional) and material interests. However, once a field has become institutionally established and stable (such as is the case in some national or local fields of industrial relations), dominant norms and belief system are hypothesized to shape the behaviour and cognitions of all actors within a field and symbolic conflicts tend to cease.

The paper begins with a literature review and discusses existing perspectives on the determinants of labour transnationalism with a particular focus on the automobile industry. Then we develop an institutional logics perspective on cross-border cooperation and suggest an interpretative framework that allows evaluating the state of institutional logics (DiMaggio and Powell, 1983; Scott, 2008) and their effects upon the behaviour, cognitions and emotions of actors. In the ensuing section we outline and explain our sample selection of two auto-companies, GM/Opel and Volkswagen (VW), and present empirical results from 19 semi-structured interviews with trade unionists and EWCs in Germany, the UK and at the European level.¹ After the discussion of the results, we draw our conclusions.

Literature review

Most of the existing literature on labour transnationalism explicitly or implicitly draws on a rational choice conception of collective actors (Streeck, 1998; Anner et al., 2006; Gajewska, 2009; Bernaciak, 2010, 2013). According to classical rational choice theory of collective action (Olson, 1965), labour representatives would not be willing to contribute to a public good (such as transnational wage bargaining coordination rules or cross-border industrial action) unless coercion or some other special incentive for (international) cooperation exist. Following this line of reasoning, unions may be able to overcome the collective action problem because of special incentives and support at national and transnational level that make certain forms of cooperation plausible. The relevant literature in the automobile industry identifies the following incentives that were found to support the cost-benefit considerations in favour of transnational collective action: transnationalisation of business activities, management strategies of coercive cost-comparisons and inter-plant competition within multinational companies, the EWC Directive, European and Global Framework Agreements, and existing transnational networks of European and World Works Councils (Anner et al., 2006; Bernaciak, 2010; Dehnen and Rampeltshammer, 2011). In her investigation of GME in Germany and Poland, Bernaciak (2010, 2013) found evidence that supports her rational choice based assumptions of trade union interests and behaviour. Before the crisis, unionists cooperated transnationally when no local negotiation channel was available to German unionists and the Polish unionists benefited more from the assistance of their Western counterparts than from local solutions (Bernaciak, 2010: 119). During the crisis trade unions were found to re-orient their strategies towards the national level because of the state's extraordinary involvement in the economy (e.g. bonus for scrapping cars, state support in investments). These national opportunities provided viable alternatives to transnational strategies and, eventually, disrupted former transnational cooperation and trust relationships between labour actors (Bernaciak, 2013: 140). As a rational-

choice perspective on transnational collective action underlines the role of (changing) political and structural opportunities, trade unions seem to oscillate between different spatial levels and adapt their strategic orientations, respectively. Social ties and trust relationships seem to play a subordinate role when it comes to follow one's particularistic economic interests.

In order to understand more sustainable forms of labour transnationalism, rational choice based theories and macro-institutional comparisons are often combined with or substituted by actor-centred conceptions derived from trade union revitalisation literature. A commonality of the latter approaches is their interest in social mechanisms that shape the behaviour of trade union actors. In this regard, two strands of literature can be distinguished: 1) social movement literature (Kelly, 1998; Frege and Kelly, 2003; Greer and Hauptmeier, 2008; Gajewska, 2009) and 2) sociological neo-institutionalism (Voss and Sherman, 2000; Pernicka and Glassner, 2014). Social movement literature develops a perspective on micro-social processes and the construction of common understandings and interpretations of the social world (framing) and emphasizes the importance of *leadership* (McAdam, 1988; Ostrom, 2000) in mobilizing (trans)national collective action. With their notion of 'identity work' (see above), Greer and Hauptmeier (2012) contributed to this vital debate. A less developed strand within revitalization literature refers to neo-institutional conceptions of organizational theory. This literature concerns both, the characteristics of unions and unionists themselves and their social embeddedness within meso-level institutional fields. In their analysis of union revitalization processes in the United States, Voss and Sherman (2000) referred to leaders with activist experience outside the labour movement who not only build bridges between organizations but also between distinct norms and cultural expectations (bureaucracy vs. bottom up organizing). The introduction of new cultures combined with necessary power resources (management at the top) entailed regulatory forces that lead to isomorphic processes of the involved organizational units of trade

unions. In addition, Voss and Sherman (2000) found evidence of 'normative isomorphism' (DiMaggio and Powell, 1983) which occurs primarily through professionalization processes. Through the selection and training of union organizers and staff in the AFL-CIO's Organizing Institute they were made committed to the new strategic model of trade unionism.

Both strands of revitalization literature (social movement and neo-institutional organizational theories) differ from rational-choice accounts in that they perceive actors' interests and cognitions as socially embedded rather than as given *ex ante*. Moreover, both specify the (historical) conflicts over symbolic (norms and values, interpretative frames, etc.) and material resources between industrial relations actors. Contrary to social movement concepts, neo-institutional accounts focus on field-specific institutions and processes that shape the identities and behaviour of actors. Rather than by continuous face-to-face contacts between engaged activists, pre-existing and newly introduced institutional logics in organisational fields² are assumed to condition actors' choices for sense making, the vocabulary they use to motivate action, and their sense of self and identity (Thornton et al., 2012: 2). Institutional logics and (micro-)political struggles over their (re)production and change are regarded as primary mechanisms that facilitate and sustain or hinder cooperative behaviour in industrial relations fields. Thus, we argue that the neo-institutional conceptions of institutional logics and institutional strategies provide us with a better understanding of the determinants of labour transnationalism.

An institutional logics approach to labour transnationalism

This paper strives to enhance existing theorising on the determinants of transnational cooperation of labour and its sustainability. Apart from regulative institutions (EWC directive, Framework Agreements, more recent measures of the *European Economic Governance* regime

and the TROIKA, etc.) we argue that existing institutional logics (i.e. belief systems and associated practices) in fields of industrial relations provide labour actors with positive or negative power resources vis-à-vis employers and state actors as well as intra-group relationships of labour. Moreover, institutional logics represent common meaning systems which shape orientations, identities and social action in a field. While the predominance of the capitalist market logic explains the behaviour and orientations of employers at transnational level, trade unions need to build institutional bridges from national fields and fight for alternative institutional logics at transnational level. The logic of cooperation is closely related to institutions of the corporatist and social democratic welfare-state. However, institutions of cooperation might govern the cognitions and behaviour of industrial relations actors also beyond the national level. Still, the predominance of the market logic puts pressure also on the perceptions and behaviour of national trade unions. They often support organizational forms and practices that increase national competitiveness of their constituencies in internationalized markets rather than develop transnational norms of cooperation and solidarity. Conformity to the symbols and practices of the market logic may generate legitimacy in regard to their national constituencies and hence, secure access to national and local resources (membership fees, mobilizing capacity at local and national level).

Under certain material and institutional conditions we expect an increased probability that labour actors engage in transnational collective action. The expansion of product markets is expected to push trade unions and EWCs towards strategic labour transnationalism if they exhibit organizational strength in terms of structural, associational and institutional power. Transnational institutions are conceived as the results of (historical) interactions and struggles between actors in internationalized fields (see Turner, 1996). This brings us to the concept of institutional work or institutional strategies (two terms we use synonymously) defined as work

motivated significantly by its potential institutional effects. Institutional work can therefore also be understood as physical or mental effort performed in order to achieve an effect on an institution (Lawrence et al., 2009: 15). For instance, trade unions' efforts to create cross-border institutions of cooperation involve 'harder' work than business activities aiming to enforce market related interests. This is true at least under current conditions where EU policies and institutions of market liberalism prevail.

Once supportive transnational institutions of cooperation and solidarity have been established, we assume these to provide labour actors with power resources and repertoires of contention (Tilly, 2006) even in times of crisis. With regard to institutions as resources, we distinguish between regulative, normative and cultural-cognitive elements (Scott, 2008) that impact upon the type of behaviour as well as on world views and identities (Thornton et al., 2012). Moreover, institutional effects can also be measured along reported and observed emotional reactions of individual field actors. For instance, actors who deviate from firmly established normative expectations, cultural-cognitive beliefs and community practices of solidarity are expected to feel ashamed and confused and hence, feel the need to justify themselves (Scott, 2008: 60). Thus, apart from observable behaviour, it is the cognitive and emotional dimensions that provide us with a means to evaluate whether or not common meaning systems are widely intact or not.

Two cases of labour transnationalism: GM/Opel and Volkswagen

In methodological terms, we selected two extreme cases (Ebbinghaus, 2006) of successful labour transnationalism in the automobile industry (Volkswagen and GM/Opel) in most different national fields of industrial relations (UK and Germany). GM/Opel and Volkswagen share some commonalities but also differ in important aspects. Both have strong actors of employee

representation and both belong to the automobile industry which holds a strong position compared to other sectors of the economy. This is especially true for Germany: few economies are as dependent on the automobile as the German economy (Diez, 2012: 37). The UK motor industry has suffered from structural problems but seems to be recovering, having 'reinvented itself over the past 15 years' (Cooke, 2009: 29). However, the two selected companies and their labour representatives show considerable differences with regard to their economic situation and their endowment with institutional resources. Drawing on the above developed neo-institutional framework we evaluate two hypotheses: (1) As the probability of labour transnationalism increases with a rise in power resources we expect that labour actors at GM/Opel have to put more efforts into 'institutional work' to build up and sustain transnational cooperation than their counterparts at VW. (2) A decline in transnational co-operative behaviour does not necessarily mean that norms of cooperation and solidarity ceased to exist and be influential. Firmly established institutional logics of cross-border cooperation are expected to impact upon social action and orientations, even if there is no observable transnational collective action.

The Adam Opel AG with its headquarters in Rüsselsheim, Germany, is a daughter of the American carmaker General Motors (GM). Until 2010, GM's European branch was called 'General Motors Europe' (GME) and included – among others – the German brand Opel and the British brand Vauxhall. Since 2010, GME ceased to exist and GM's European operations have been run by the Adam Opel AG. GM/Opel has 11 manufacturing sites in Europe, four of which are located in Germany and two in the UK. The vast majority of the 35,000 GM-employees in Europe is employed in Germany (Adam Opel AG, 2013). Unlike GM/Opel, VW has no separate European management but the global company headquarters are located in Wolfsburg, Germany. The company encompasses 12 brands and has about 570,000 employees

worldwide, 260,000 of which are employed in Germany. Of the 28 production sites in Germany, 10 belong to the Volkswagen brands (*Volkswagen PKW* and *Volkswagen Nutzfahrzeuge*) (Volkswagen AG, 2014). Since 1998 the British brand Bentley with its manufacturing site in Crewe (UK) belongs to the company.

Table 1. Resources for transnational union strategies in company fields.

	Volkswagen	GM/Opel
Structural Power Resources	<ul style="list-style-type: none"> • Expansion of output and markets • German company headquarters, no separate European management • High relevance of agency work 	<ul style="list-style-type: none"> • Overcapacities, declining output; but signs of recovery (increasing sales in UK) • Decades of restructuring • American company headquarters, separate but weak European management
Institutional Power Resources Regulative institutions	<p>Germany:</p> <ul style="list-style-type: none"> • Company collective agreement (+) • 'VW-law' (+) • Co-Determination at work-place level and supervisory board level (+) <p>United Kingdom:</p> <ul style="list-style-type: none"> • Plant level agreement (+) <p>Europe/World:</p> <ul style="list-style-type: none"> • European and World Works Councils (+) • International Framework Agreements (IFAs) (+) 	<p>Germany:</p> <ul style="list-style-type: none"> • Sectoral collective agreement (+) • Co-Determination at work-place level and supervisory board level (+) <p>United Kingdom:</p> <ul style="list-style-type: none"> • National company agreement (+) <p>Europe/World:</p> <ul style="list-style-type: none"> • European (and World) Works Councils (+) • European Framework Agreements (EFAs) (+)
Normative and cultural-cognitive institutions	<p>Industrial relations in company field:</p> <ul style="list-style-type: none"> • Labour relations based on social partnership (+) • Acceptance/fostering of co-determination by the employer (+) • Strong involvement of works council in company policies (+) • Notion of 'VW-family' (+) • Limited/moderated' intra- 	<p>Industrial relations in company field:</p> <ul style="list-style-type: none"> • Labour relations more conflictual (breaches of EFAs by employer) (-) • Some involvement of German works council in company policies (+) • Transnational 'whipsawing'(-) • Possible changes in management culture because of personnel changes in

	company competition (+) Intra-labour relations: <ul style="list-style-type: none"> • Acceptance of IG Metall's leadership in transnational employee cooperation (+) 	management (+/-) Intra-labour relations: <ul style="list-style-type: none"> • Transnational cooperation punctured by site egoisms (+/-) • Good relationship to American UAW (esp. UK) (+)
Associative Power Resources	<ul style="list-style-type: none"> • High union density (90+ in Germany, 55 – 90 in UK) 	<ul style="list-style-type: none"> • High union density (50 – 90 in Germany, 90+ in UK)

(+/-) indicate that institutions provide positive or negative power resources to labour actors

In the following subsections, structural, institutional and associational power resources for transnational cooperation of unions and employee representatives at GM/Opel and Volkswagen in Germany and the UK are presented. The ensuing section contains evidence of labour transnationalism before the crisis, followed by a section on developments in cross-national cooperation and normative orientations after the crisis.

Structural power resources

GM/Opel has been in a difficult economic situation for decades and experienced various restructuring programs. It has been faced with problems of overcapacities, declining output, lay-offs and plant closures, with the situation deteriorating in the economic crisis of 2008/09. The bad economic situation of the company can be attributed to various faults in management strategies (e.g. the restriction of the brands Opel and Vauxhall to the European market and the ignorance of special characteristics of the European market) (Blöcker et al., 2013: 20–29). The company policy was determined by the management of the US mother company GM. The single brands had almost no autonomy and the centralized European management had little influence on important decisions (Hauser-Ditz et al., 2010: 346; Blöcker et al., 2013: 43). However, since the insolvency of GM in 2009 small signs of recovery can be detected (interview

17). In 2013, the most important markets for Opel were the UK and Germany. The highest market share for Opel was achieved in the UK (Adam Opel AG, 2013).

Volkswagen's economic situation on the other hand could not be more different. After a phase of employment reduction until the middle of the 2000s (Hauser-Ditz et al., 2010: 147–148), the company has increased employment worldwide since 2007 and is continuously expanding (new brands and new markets) and increasing its output. In contrast to other big Original Equipment Manufacturers (OEMs), VW did not experience a deep crisis in the years 2008/9 but rather the course of growth and expansion was accelerated (Pries and Seeliger, 2012: 86). This is also the case for Bentley, which has increased its production numbers (Hamprecht, 2012: 36). Also, Bentley cars belong to the luxury segment with very high profit margins. For about three decades, Volkswagen has been the biggest automobile manufacturer in Europe and – following its 'Strategy 2018' – is aspiring to become the world's biggest OEM as well (Pries and Seeliger, 2012: 81).

Regulative power resources

As mentioned above, both companies have strong actors of employee representation at establishment and enterprise levels. They act within a regulative framework which supplies positive as well as negative resources for transnational union action.

Opel in Germany applies the sectoral collective agreement for the metal industry (although with temporary downwards derogations for the Opel sites) while Vauxhall in the United Kingdom has a national company agreement, which covers the sites in Luton and Ellesmere Port and a warehouse. While British industrial relations are characterized by voluntarism and a mode of collective laissez-faire because of the absence of statutory regulation (Hyman, 2003: 40), the German labour law provides for far-reaching co-determination rights at establishment and

enterprise level. Thus, Opel in Germany has a strong works council, and unions and employee representatives are members of the company's supervisory board. The strong German co-determination rights are somewhat extended to the European level by means of the European Works Council (EWC) of GM/Opel. The GM/Opel EWC was founded in 1996 – as a voluntary agreement a few days before the EU directive came into effect – as the 'European Employee Forum' (EEF) because the management opposed the use of the term 'works council' (Dehnen and Rampeltshammer, 2011: 11). Since 2012, an additional agreement has stipulated the application of the reformed EWC directive, and the body is now called EWC. Since its establishment, the GM/Opel EWC has concluded numerous European Framework Agreements (EFAs) with management concerning company restructuring in Europe (see below). Presently, the GM-unions are engaged in the process of building up a 'Global Information Sharing Forum' (that is meant to become a world works council). A preliminary agreement on this with management could be reached in 2012 and three meetings have taken place so far (June 2014). In contrast to the EWC, it is lacking any legal backing however.

The Volkswagen AG is an exception within the German auto industry as it does not apply the sectoral collective agreement but a company collective agreement, which has – in the past – exceeded the sectoral pay level (Jürgens et al., 2006: 26).³ The VW plant in the UK – Bentley – applies a plant level agreement. The strong German co-determination rights described above also apply to Volkswagen. However, the so-called 'Volkswagen-law' provides additional power to the employees' side in the company: special regulations on decision making in the supervisory board make the approval of the employee representatives necessary for the opening and re-locating of sites. Also, the federal state of Lower Saxony still holds shares of the VW company. The power of the German works council is transferred to the European and global levels via the company's European and World Works Council. Volkswagen's EWC was

established in 1990 – as one of the first EWCs ever and the first in the auto industry – and officially recognized by management in 1992 (Hauser-Ditz et al., 2010: 132). The World Works Council (WWC) was established in 1998/99. At the beginning of 2014, the two bodies and their presidiums were integrated to make employee cooperation more efficient (in its functioning, the European and World Works Council at VW can be understood as one body, and we will use the abbreviation ‘W/EWC’ in the following). Unlike at GM, framework agreements at VW are concluded at the global level (International Framework Agreement – IFA). Such IFAs are for example the Charter on Labour Relations, the Charter on Temporary Agency Work (TAW) and – soon to be – the Charter on Vocational Training. The charters are implemented at the different sites according to local laws and customs. TAW plays an important role at the German VW sites. However, the IG Metall has negotiated collective agreements on TAW with the company which are seen as exemplary by the union and which serve as a model for the respective IFA. Other collective agreements in place at VW are also regarded as model collective agreements within IG Metall.

Normative and cultural-cognitive power resources

Dominant ‘Institutional logics’ within the company subfields might facilitate or hinder the emergence of transnational norms and cultures of cooperation between labour actors. At VW firmly established norms of social partnership impact upon both sides of industrial relations, management and labour, and facilitate labour’s role in transnational cooperation. In contrast, institutional logics at GME (and later, at GM/Opel) widely mirror US-American labour relations which are characterised as being relatively conflictual (e.g. Rampeltshammer and Dehnen, 2010). Thus, at GM/Opel we expect that labour has needed to invest more own attempts to successfully coordinate labour activities at transnational level. However, open conflicts with

management might also serve as an incentive to generate solidarity between labour actors at different sites. In the years after the establishment of the EEF the management was rather hostile toward transnational employee participation (e.g. Dehnen and Rampeltshammer, 2011). An example is that GM management did not always comply with the principles set down in the EFAs such as informing the EWC about planned restructuring and refraining from plant closures and compulsory redundancies (see below). However, management recognized the EEF as negotiation partner which strengthened norms of cross-border cooperation and exchanges among union and labour representatives. Recent changes in the management of GM/Opel might improve the often tense relations between labour and management. According to some union officers, the 'new' generation of managers is more willing and open to talk with labour representatives than it was the case with the previous generation (interviews 03 and 17). Other respondents do however not observe more labour-friendly attitudes among newly hired managers.

Among labour representatives themselves, strong norms of solidarity and the principle of sharing the burden of restructuring have been established over time and laid down in joint declarations such as the 'European Solidarity Pledge' (see below).

The EWC at GM/Opel is often described as being 'German-centric'. However, the dominance of German union officers and, in particular, their chairing of the EEF is in most cases seen as something positive. Labour representatives in other countries benefit from strong employee co-determination rights in Germany that guarantee access to timely and encompassing information provided by management. The role of German union officers in promoting and organising transnational meetings is appreciated by labour representatives from other countries. Likewise, cooperation with the US-American UAW union is regarded as a structural and symbolic asset for European labour representatives due to their direct access to the central management.

Therefore, IG Metall officers secured a seat of the UAW representative in Opel's supervisory board and thereby strengthened the EWC as a forum for effective information exchange at the transnational level.

At Volkswagen labour relations are based on partnership and cooperation and go beyond legally guaranteed co-determination (Jürgens, 2002: 10). The principles of social partnership and co-determination are widely accepted by management; management and the trade union are 'partners on equal terms' (interview 10). The works council is involved in business policies and has participated in company restructuring. Both management and labour have agreed on the aim of balancing competitiveness and employment security, the so-called 'Volkswagen way' (interview 10). The labour representatives are also directly and regularly involved in business policies (Jürgens, 2002). This approach also extends to transnational employee participation in the W/EWC. International meetings of labour representatives are funded by management, and they provide for language interpretation as well. The EWC was quickly accepted by management as a tool to strengthen cooperative relations with workers transnationally. In its functioning it mirrors the German model of co-determination (Greer and Hauptmeier, 2008: 89). The same holds true for the World Works Council that is even more important than the EWC due to the global scope of the company. The active and well-connected W/EWC at Volkswagen is a vital institutional resource for the IG Metall union to obtain information about the development of the MNC.

Labour representatives from other countries perceive the W/EWC at VW as 'German-centric'. Despite this German dominance the IG Metall's leadership role is accepted and considered as being beneficial to transnational labour cooperation as such. The W/EWC is perceived as being 'inclusive', and representatives from individual plants are encouraged to actively participate in meetings, projects and personal exchange. Relations between the British and German

representatives are strong and information and cooperation take place on a regular basis. British (and, to a lesser extent, Polish) EWC members expressed a strong sense of belonging ('being part of the network') to 'the Volkswagen family' (see below). The evolvement of cooperative labour relations at the British plant was also fostered by the fact that more and more Germans are part of the Bentley management. For instance, personnel managers have introduced HR-practices and principles applied at German plants (e.g. working time flexibility, the 'breathing company'). Due to the specific market position of the Bentley car, the plant is rather independent from locations in Continental Europe with regard to product- and market-related business strategies. Nevertheless, cooperation with colleagues from German VW-plants that manufacture similar products (or even share platforms such as for the Phaeton) is intense and regular (see below). The management actively supports and provides resources for exchange between workers from British and German plants.

When it comes to deliberations about product allocation within the W/EWC at VW, norms of cooperation prevail over norms of competition. With regard to the UK and Germany, this is largely due to the limited inter-plant competition between Bentley and the other VW-brands and the generally strong market performance of VW cars. An important factor is also the strong position of the German labour representatives on the company's supervisory board. However, there have been recent instances of concession bargaining (e.g. about the allocation of a SUV between Bentley and Bratislava) within the company. In most cases, labour representatives seem to have managed to resolve distributional disputes (see below).

Associational power resources

At both GM/Opel and VW union densities at their German and British sites are high. At the German sites (and the German car industry in general), the IG Metall is the only relevant union.

In the British motor industry, the dominant union is Unite, but a smaller union – GMB – also plays a role (as it is the case at the Bentley plant in Crewe). The German Opel sites have union densities from 50 – 90%, varying between white and blue collar workers and between East and West Germany. At the UK sites, density (of Unite) among blue collar workers is estimated to be even above 90%. At Volkswagen, the union density in all German VW-plants is extremely high, mostly close to 100%. It is another speciality of VW that union density is also very high in white collar areas and at East German sites. At Bentley, there is a difference between white and blue collar workers, but with about 55 and 90% respectively, the union density is high and above UK average (interview 16).

In Germany, the vast majority of works council members at Opel as well as VW are organized in the IG Metall and the personal ties between union and works council are strong. With regard to VW one could go as far as saying that the ‘dual system’ of interest representation can be considered somewhat short-circuited, because of the organisational strength of the IG Metall at VW and its direct negotiations of the company collective agreements with management (Jürgens, 2002: 11–12). In both companies, representatives of the IG Metall are directly participating in the meetings of the EWC and the Global Forum/World Works Council.

Labour transnationalism at GME and VW before the crisis

This section presents empirical evidence of labour transnationalism at GME and VW. Both, transnational institutional strategies and behaviour of labour representatives as well as their normative orientations and cultural-cognitive dispositions are in the focus of our analysis. The aim is to show whether or not established principles of transnational solidarity and cooperation have remained intact and govern the behaviour, norms, values, and shared understandings of labour representatives at GME and VW in the period before the global economic crisis hit the European car industry in 2008.

Transnational labour action at GM/Opel

Transnational labour cooperation at GME dates back to the establishment of the EEF in 1996. Since then, the EEF has developed into an active and effective forum of employee participation and mobilisation (e.g. Fetzner, 2008; Greer and Hauptmeier, 2008). Employee representatives responded to management strategies of establishing standardized platforms for certain models at different plants and whipsawing techniques to put pressure on labour costs by intensified cross-border cooperation. Furthermore, the EWC achieved to negotiate and conclude agreements with the company's management (i.e., several EFAs between 2000 and 2008) (Da Costa and Rehfeldt, 2007; Rampeltshammer and Dehnen, 2010; Bartmann and Blum-Geenen, 2007). The EWC took on a negotiation role for the first time in the conflict with management about a joint venture with Fiat. The EWC was not consulted on the management's plan. This breach of the statutes of the EWC agreement led to the signing of the first EFA that provided for the consultation of the EWC by management on future decisions about investment and capacity (Gajewska, 2008: 113). One year later, the announced closure of the British plant in Luton was met by transnational labour protest. For the first time, workers from a large number of GME sites protested against the closure of the Vauxhall/Vectra plant in early 2001. In the same year, the EWC succeeded to sign the second EFA that dealt with the social costs of the closure of the Luton plant; compulsory redundancies could be avoided (Gajewska, 2008: 114; interview 17). However, due to continued economic difficulties of the company the management announced another round of restructuring ('Olympia plan') which aimed at the reduction of capacities at Opel, Vauxhall and Saab plants. In October 2001 the management and the EWC concluded the third EFA based on a 'common understanding of important principles' shared by both parties. The management agreed to reduce capacities without plant closures and compulsory

redundancies and labour representatives accepted the necessity to improve productivity (Da Costa and Rehfeldt, 2007: 314). The EWC adopted the principle of 'sharing the pain' according to which concessions were seen as necessary, but distributed evenly across plants in Europe (Greer and Hauptmeier, 2012: 287).

As the economic situation of GME did not improve despite restructuring and cost-cutting programs, management announced further restructuring plans without prior consultation. This time, the German sites were targeted. The announcement of massive lay-offs at German plants led to wildcat strikes at Bochum. Bidding contests were initiated for the Zafira (between Rüsselsheim and Gliwice in Poland) and the Vectra (between Rüsselsheim and Trollhättan). The Swedish and German unions and the EMF jointly declared to reject competition between production sites and share job losses ('Copenhagen Declaration'). With the support of the EMF, the EEF organised the second European Action Day on 19 October 2004, with work stoppages at plants across Europe (Gajewska, 2008:114). In the wake of the events of transnational industrial action the fourth EFA (no compulsory redundancies, no plant closures) was signed in December 2004.

For the German IG Metall union the EEF became an important arena for transnational action (e.g. Bartmann and Blum-Geenen, 2006). Together with the EMF the German union contributed to the foundation of a 'European Trade Union Coordination Group' (ETUCG) in 2004 that aimed at supporting the EEF by national (and European) trade union officers. Trade unions from 11 countries participated in the ETUCG of GME. The involvement of the EMF was seen as positive by representatives from both IG Metall and Unite. The IG Metall organised a number of meetings that facilitated exchange between employee and union representatives at European sites.

One year later (2005), the so called 'Joint Delta Working Group' was established in order to strengthen cooperation between sites that shared GME's 'Delta Platform' for the production of the Astra-model. The aim of the group was to reduce inter-site competition in bidding contests for the Astra. In the same year, the IG Metall, with the support of the EMF, initiated the 'GMEECO' (General Motors Europe Employees' Cooperation) project. The role of the IG Metall in initiating and managing the project was appreciated by respondents from the UK (interviews 15 and 18). The project which was partially funded by the European Commission was set up to provide financial and organisational support for meetings of the Delta Working Group. The meetings helped to build up mutual trust relations between union and employee representatives from the five Delta plants (in Belgium, the UK, Poland, Sweden and Germany). Personal exchange and communication between the Delta plants was regular and intense, according to all respondents. British participants of the Delta Group retrospectively point out the good and lasting contacts they made, and that they could 'pick up the phone and ring anybody up in Germany' (interview 14). Even after the GMEECO projects (a follow-up project called GMEECO II fell into the turbulent times of crisis), strong ties and communicative relations persisted. Project-based cooperation has continued, even if projects were not centred on employee participation but other, i.e. business-related, issues (interview 17).

Union cooperation within the Delta Group was overshadowed by persisting economic difficulties of GME. In June 2006 after the management's announcement to close down the plant in Azambuja (Portugal) labour representatives mobilised workers transnationally and organised protest and industrial action at other European plants (Gajewska, 2008; Greer and Hauptmeier, 2012). Although the plant in Azambuja was not part of the Delta Group the IG Metall, together with the EEF, used the platform to organise (for the third time) 'European Action Days' over a period of several weeks (interview 07). However, in the end, the closure of the plant in the same

year was not averted. Labour cooperation was again put to the test during the conflict about Azambuja; the management announced the reduction of three to two shifts at the Ellesmere Port plant. Another European Day of Action was organised in May 2007, when the management announced to exclude the Antwerp plant from the production of the Astra.

Intense inter-plant competition and whipsawing by management led to growing tensions within the EEF and showed the limits of 'burden-sharing'. In ensuing negotiations with management after the closure of Azambuja, the British were disappointed by the lack of support by German EWC members to fight the management's plan to take out one shift at Ellesmere Port (interview 14). Rather, local negotiations were carried out at the Bochum plant, in order to save capacity for the plant that was perceived (by British labour representatives) to benefit from the reduction of working time at Ellesmere Port. Despite these tensions, the norm of 'sharing-the-pain' was still effective; a further EFA on product allocation among the four Astra plants was concluded in late 2007 (Greer and Hauptmeier, 2012: 291). However, the deepening of the crisis at GME and continued restructuring and downsizing by management led to the closure of plants (Azambuja, Antwerp and the sale of the Saab plant in the Swedish Trollhättan) and weakened the European trade union network. Yet, labour representatives still entered into negotiations with management. Another EFA was settled on outsourcing and product allocation within the new Delta platform in April 2008 (Dehnen and Rampeltshammer, 2011: 123). Like other EFAs before, this agreement was also broken by the management, and competition among Astra plants remained fierce (see below). With the breakout of the global economic crisis, the Joint Delta Working Group dissolved.

Transnational labour action at VW

At Volkswagen a European Works Council was established in 1990, and a World Works Council (WWC) was set up in 1999. The IG Metall was actively involved in the establishment of a transnational forum for labour representation since the MNC's global expansion. In the early 1980s the IG Metall initiated a global trade union network that included lay union members as well as non-members. Within the so called 'InterSoli' (International Solidarity) network various topics were addressed in different working groups. Cooperation is described as being particularly intense in Asia and South America, and later, in Central and Eastern Europe (interviews 12 and 13). The global level, or the WWC, is of greater importance for trade union action than the European one due to the global expansion of production and markets by the Volkswagen company (interviews 11 and 12).

In order to improve the competitive position of the VW company restructuring measures were implemented in the mid-1990s and competition between plants increased (Pries and Schweer, 2004). The allocation of product volumes became an important issue for the EWC. Labour cooperation was seriously challenged for the first time when management announced to close the plant in Brussels. In a joint declaration the EWC demanded to fairly share risks and chances. Finally, the closure of the plant was averted and a part of the jobs was maintained (Hauser-Ditz et al., 2010). For some (critical) observers though the case of Brussels does not indicate solidarity but rather particularistic national (and local) interests of German labour representatives (Bartmann and Blum-Geenen, 2009: 92). It was reported that an open conflict broke out between labour representatives from different countries and a member from Slovakia left a meeting of the EWC in anger about job losses among agency workers at his plant due to the shift of production to Brussels (Hauser-Ditz et al., 2010: 148-149; Knirsch, 2014).

From the perspective of British unionists cooperation within the W/EWC is described as being particularly well developed with the Germans. The British W/EWC member appreciates the role

of both the current chairman of the W/EWC and German unionists in coordinating regular information exchange. Even though there is no direct competition between the British and other plants the British labour representative takes part actively and regularly in information exchange within the W/EWC (interviews 11 and 16). Examples for the strong and sustained cooperative relations between British and German labour representatives are the deliberations on the assembly of engines (between Crewe and Salzgitter) and components (between Crewe and the plants in Chemnitz, Mosel and Dresden) (interview 16).

Despite the vast associational power of Volkswagen's W/EWC it took on a negotiation role later than GME's EEF. The 'Charter of labour relations', signed by the management, the International Metalworkers' Federation (now IndustriAll Global) and the World Works Council in 2009, aimed at extending the German model of employee participation globally (Pries and Seeliger, 2012). Likewise, another IFA, i.e. the 'Charter of Temporary Work in the Volkswagen Company', was signed in 2012. It lays down principles of equal treatment and equal pay of temporary and core workers. However, the implementation of the Charter at plants in different countries is uneven (interview 10). Currently, another IFA on vocational and continuous training is planned. The implementation of IFAs fosters transnational cooperation. For instance, the agreement on temporary work at the Bentley plant in Crewe is modelled on the IFA, and the plant was one of the first locations where the Charter was implemented. The agreement settled between Unite and the local management 'aspires at fixing the share of agency workers at 5%', based on the quota set in the global charter (interview 16). Although this goal has not yet been reached, the Charter helped to improve pay and working conditions of temporary agency workers that some years ago were 'a raving problem' at Bentley (interview 15). For Unite the global Charter's principle of 'parity for temporary agency workers' was used in the union's national campaign on agency work (interview 16).

The W/EWC's capability to mobilize workers across countries became apparent for the first time when workers from different plants demonstrated for the maintenance of the Volkswagen-law. The law, that guarantees far reaching rights for labour, had to be amended according to the decision of the European Court of Justice. Workers from plants in Europe, such as at the Polish VW plants, and beyond participated in the protests (interview 12). Acts of transnational solidarity at a number of European plants were also reported to have taken place during the fight against the takeover of VW by Porsche.

Normative and cultural-cognitive orientations

Building up and maintaining institutional logics of transnational cooperation and solidarity are not only observed at the level of visible behaviour. Evidence for the effects of institutions is found also at the level of normative orientations and cultural-cognitive patterns. In the years from 2000 onwards, labour representatives from GME and Volkswagen have intensified cross-border cooperation, concluded European or International Framework Agreements and organised transnational protest and industrial action. Transnational collective action of unions is based on at least partially shared understandings of solidarity and might contribute to the deepening of cooperative relations based on solidarity.

The EEF as a transnational institution for worker participation is perceived as being highly beneficial in particular by unionists from the UK where rules for employee representation are voluntary, sectoral collective bargaining is absent and relations between management and labour are more conflictual. British EWC members unequivocally appreciate the access to information provided by management, insight into business plans and investments based on strong German employee co-determination rights. Likewise, the allocation of a seat to the US-American representative from the UAW union in the supervisory board of Opel is valued as positive by European labour representatives in order to get access to the central management

in Detroit. In addition to the strengthening of their negotiation power vis-à-vis local management via the EWC, transnational exchange between labour representatives has helped 'to sustain relationships, build understandings, talk about each other's problems and gives you an insight into cultural differences' (interview 17). Although conflicts and differences in opinions are part of the interaction within the EEF the norm of cooperation seems to be strong: 'Conflict actually brings us in a sense together to find a solution' (interview 17). Initiatives such as the GMEECO project that aimed at financing meetings between Astra plants (see above) were seen as 'a stepping stone (...) in the creation and maintenance of a working relation on the employee side' (interview 17). Personal exchange between unionists and plant level representatives helped to 'break down cultural barriers' (interview 18). IG Metall representatives state that cooperation with the Polish trade union Solidarnosc became strong since the Delta Working Group was founded (interviews 02 and 07). Union officers from Unite underscore intense and long-standing cooperation with their German colleagues (Interview 19). Their relationship with the Polish union representatives is described as being a 'good working relation' that is sometimes hampered by language problems (interview 19).

Union officers from IG Metall express a certain feeling of obligation to support labour representatives from other countries (including the provision of financial aid) to ensure their participation in joint meetings or to cover interpretation costs. A cautious position is expressed by IG Metall officers concerning the GMEECO project; the aim was to set up a common 'European' project that should be perceived as a joint endeavour by non-German participants (interview 07). Mutual learning, the exchange of information about national industrial relations and labour law as well as national trade union cultures is perceived as being an important goal as well as a benefit of joint meetings.

The norm of 'sharing the pain' of the costs of restructuring and downsizing seems to be still in place but is considered as being 'still very much work in progress' (interview 17). The maintenance of the norm required considerable efforts by EWC members and union representatives. The British, for instance point to the Bochum plant that previously and repeatedly gave concessions that went beyond what was agreed on in joint agreements and thereby starting a 'race to the bottom' (interview 18). Likewise, it was conceded that it was difficult to get the Polish representatives on board and that it required, at least in the beginning, some efforts to convince them about the benefits of joint negotiations (interviews 07 and 18).

Cultural norms differ most strongly when it comes to transnational protest and strike action. Although the efforts of the British labour representatives to initiate protest actions despite harsh anti-strike regulation were appreciated by the Germans (interview 02), according to another source the willingness of the British labour representatives to mobilise workers seemed limited (Rampeltshammer and Dehnen, 2010). Some British unionists feel that their efforts to organise protest action are not sufficiently honoured by colleagues from other countries (interviews 14 and 15) while at the same time stating that the Germans 'did not do as much as they could' in transnational industrial action (interview 14).

At Volkswagen transnational labour cooperation dates back to the 1970s; the 'Intersoli' network is considered as the 'nucleus for the European Works Council' (interview 12). German labour representatives underscore the importance of respecting cultural differences and norms. For instance, the implementation of the Global Labour Charter should consider national institutions and practices at the plants. A transfer of the German model of co-determination is neither seen as feasible nor desirable (interview 12). Despite the caution expressed by German unionists not to be perceived as culturally dominant they sometimes also show paternalistic orientations (e.g. Greer and Hauptmeier, 2008). German labour representatives see it as their task to 'qualify

people' in order to ensure the implementation of the global charter of labour relations (interview 12). However, mutual learning and information exchange are considered as being crucial in order to enlarge the knowledge about national labour relations and practices of employee participation.. From a British point of view the German aspiration to extend employee representation to all VW locations is not felt to be a kind of 'imperialist' behaviour but on the contrary, the German-centric but inclusive way in which the W/EWC is run and the efforts undertaken to build an integrated body seems to be much appreciated. For example, the British union representative was asked by the VW W/EWC to travel to America as a kind of mediator for the relationship with the UAW because of his better understanding for the US-American system of industrial relations (interview 16).

The German labour representatives are well aware of their advantages guaranteed by German co-determination law. However, they consciously do not dominate the W/EWC. Rather, they promote the balanced participation of all locations and brands and are keen to ensure equal access of non-German labour representatives to the company management. Although the chair of the company works council in Wolfsburg and the general secretary of the W/EWC 'control' the forum, they consider themselves as 'service providers for the foreign locations' (interview 12). The value of transnational cooperation within the EWC was initially not shared by British labour representatives who were rather suspicious about it but 'soon found it to be a great asset' to them (interview 16). The information about management strategies gained in EWC meetings improved their bargaining position vis-à-vis their local management that previously withheld information from labour.

The allocation of production volumes and models between plants is an important issue in the W/EWC and indicates the effectiveness of norms of solidarity and cooperation. The German

labour representatives possess considerable power to ensure compliance to common norms and principles due to their position in the company's supervisory board. Deviance from the norm of cooperation, for instance by the underbidding of wages or labour standards, would be sanctioned by the exclusion from the 'VW community' (interview 11). In fact, such an incidence has not happened yet but there were cases of 'naming and shaming' of single plants. Although no common principles for wage setting exist at VW an instrument for the comparison of pay and purchasing power between different plants was developed. In an innovative approach of creating shared knowledge a 'basket of consumer goods' was conceived in order to allow the comparison of price developments for different categories of goods and services in different countries (interviews 11 and 16). Promoted by mutual transnational learning an indirect form of unilateral wage coordination was established.

Labour transnationalism during and after the crisis

Evidence for the disruption of transnational solidarity and cooperation

Especially two incidents that occurred during the economic crisis of 2008 and the following years are claimed to have had a negative impact on solidarity and trust-relations among employees at GM/Opel. The first bone of contention was the (failed) takeover of Opel by the supplier Magna in 2009 and the active role IG Metall played in these negotiations. A takeover would have brought particularistic advantages for the German sites (Bernaciak, 2013: 146; Klikauer, 2012). From the point of view of the British trade unionists this has led to a parting of the ways and a split in the employee side as the British were very much against a takeover by Magna, because Magna was perceived to offer bad conditions (interview 14). The dealings concerning the Magna-takeover also showed differences within the Unite union. While some in the union leadership took a harsh stance concerning the Magna-deal towards the German

unionists, others 'spent a lot of time afterwards to build bridges' (interview 15). Different perceptions on the role of trade unions as economic and political actors also were a factor. For representatives of IG Metall it is perceived as normal to be politically involved in the process of negotiations with Magna and to try to influence Opel's business policy in its interest. However, it is also conceded that behaviour like that is not common for trade unions in other countries (interview 02).

The second rupture concerns the negotiations about the allocation of the new Astra model from 2016 onwards. German unionists felt the 'secret' negotiations (Hertwig et al., 2013: 10) in Ellesmere Port in 2012 to be a betrayal of trust. The British colleagues are seen to have 'bought' the Astra by giving concessions and thus broken the so called 'Delta-Agreement' (see above). German unionists are especially disappointed because in their view the British representatives have breached agreements which stipulated that such negotiations should be made public within the EWC to give the employee side the chance to jointly negotiate a result that would be acceptable for all sites (interview 06). The British union representatives concede that there is some truth in the German perception that the British colleagues were negotiating on their own. However, from their point of view the negotiations were never secret. The British unionists reported GM's demands to the EWC and also announced their intention to let the union members in Ellesmere Port decide on them (interview 14). From the British point of view, the choice was between agreeing to concessions or the site being closed. The British union representatives are of the opinion that every site would have given concessions in a situation like that, and indeed, Bochum had already made concessions to get the previous Astra model, 'they gave up all kind of things' (interviews 14 and 19). From the British point of view, Bochum was generally prone to give concessions nobody else would and the Bochum works council was obviously 'at loggerheads' with the head of the Opel General Works Council (interview 19).

Representatives of the IG Metall confirm this; there had been a common understanding among all European GM-sites that Bochum was not always reliable (interview 06).

Evidence for the maintenance of transnational solidarity and cooperation

However, despite these ruptures, our empirical evidence shows that norms and cultures of cooperation built up before the crisis have not only continued to affect the cognitions and orientations of actors, but also their behaviour. One example for this is that IG Metall made the demand for the allocation of the model 'Mokka' from Korea to Saragossa a part of their collective bargaining strategy for Opel in Germany. For the recovery of Opel, the IG Metall demanded a better utilization of all European plants. Even in the face of the closure of the site in Bochum, IG Metall did not demand the Mokka to be produced in a German plant. Rather it was a matter of course for the German union that the model should go to Saragossa as it had been stipulated in a former agreement which had been broken by the management (interview 03). However, representatives of the British Unite do not perceive demanding the Mokka to be allocated to Saragossa as an act of solidarity. Rather, they suspect future concession bargaining over that model between European sites (interviews 14 and 15).

In both companies, GM/Opel as well as VW, production volumes were shifted between plants to deal with underutilization of factories, before and during the recent crisis. As German unionists report, they were very impressed by the display of solidarity of their Polish GM-colleagues who let some production units of the 'Zafira' go to Bochum during the crisis because the workers there needed a phase of full-time work to be able to benefit from short-time work regulations afterwards (interview 02). At VW, production of the Audi Q3 was relocated from Ingolstadt to Martorell (SEAT) to increase utilization of the Spanish plant. Even though this decision could not easily be conveyed to the employees in Ingolstadt, the W/EWC played an active part in its initiation and implementation (interview 11). Something similar had already happened before

when production of the Audi A1 was given to the Brussels plant to prevent its closure. German unionists describe this as an established practice within the Volkswagen corporation (interview 11). Another example for this is that Bentley cars are also built at VW in Dresden. A union representative at Bentley describes this as Bentley's way of being part of the VW family (interview 16). Another shared product between Bentley and a German site are engines from Salzgitter which are assembled in Crewe. This cooperation seems to have been pushed on especially by the German works council, despite reservations of the German site manager. Furthermore, Bentley shares its new SUV with the site in Bratislava. Obviously, the process of allocating this model has not taken place without conflict. There seems to have been some concession bargaining with the involvement of the respective governments. However, the conflict appears to have been solved constructively. Co-operations like these lead to close and stable relations between the involved works councillors and union representatives (interview 16) which constitute resources for the solution of future conflicts.

Another established practice to compensate ups and downs in factory utilization in both companies is the exchange of employees between sites. In 2012 and 2013 workers from Gliwice were temporarily employed at the German GM/Opel plant in Eisenach. At VW in particular, the exchange of employees between sites seems to be a well-established practice. During the crisis, workers from Portugal came to work in Wolfsburg, but also before that, the continued employment of temporary agency workers had been ensured by a transfer between sites (interviews 11 and 09). Also in the case of shared products, like between Crewe and Dresden or Crewe and Salzgitter, employees get to know the products by working in the other plants and employee representatives visit each other to get to know the different sites (interview 16). In the case of VW, these exchanges are frequent and fostered to build up networks and cooperation between employee representatives.

At GM/Opel the 'institutional work' presently undertaken by unionists and workplace representatives to establish a world works council (or 'Global Forum') can be interpreted as a sign of the persistence of norms of cooperation and the continued value the actors attribute to them. The world works council is not at all meant to replace the EWC, rather, cooperation at all levels is felt to be of great importance. The establishment of the Global Forum is facilitated by the positive, pro-European stance of the US-American United Autoworkers Union (UAW) since the change in its leadership as well as the support by IndustriAll Global. The Global Forum is meant to be as inclusive as the EWC and the union representatives strive to make everybody's participation possible. For example, the financially strong IG Metall pays for flight tickets of German representatives so that representatives from other countries can take the places paid for by the company (interview 03). The British union representatives share this aspiration to establish an inclusive Global Forum. It is seen as imperative to convince the GM management of its value (interview 17). There have already been efforts in the past to include Russian employee representatives into the transnational employee cooperation even though they are not recognized as part of the EWC by GM (interview 18).

Normative orientations, values and cognitions during and after the crisis

As pointed out above, the events in the course of the crisis are claimed to have had a negative effect on transnational employee cooperation at GM/Opel. While we have already demonstrated that there is still empirical evidence for transnational cooperation of labour, we are particularly interested in the effect the crisis-related events might or might not have on the normative orientations, cognitions and emotions of involved actors.

On the one hand, we indeed found empirical evidence for an interpretation according to which the narrative 'share-the-pain' has ceased to exert influence even before the negotiations in the

UK. Already with the closure of the site in Antwerp everybody had been acting on their own again, such as the British who had been pressured by management (interview 04). From this point of view, the 'logic of competition' seems to prevail again over norms of cooperation according to which nobody should negotiate with management separately. Our interviews with British trade union representatives provide evidence for such an interpretation. As described above, thinking of one's own site first and trying to protect employment is perceived as a matter of course (interview 18).

However, the disappointment and anger of German unionists about what recently happened in Ellesmere Port also show that norms of cooperation still impact on actors' cognitions and affects. Some British trade unionists also seem to feel the need to justify their action. For example, they point out how cleverly the GM management has played the sites and unions off against each other (interview 14) and that other sites had also not complied with EWC-agreements in the past. From the German point of view, however, the British defection is seen as a particularly great disappointment precisely because the British had always kept to the joint agreements before (interview 06). Still, there is a basic understanding that workplace representatives and local unionists can be under great pressure in certain situations and do not have much room to manoeuvre. Efforts are being made to come to terms with what happened and to talk to each other again. Some German unionists feel, however, that an objective discussion with the British unionists is not possible because no one would take responsibility for their agreement with management and thus making it impossible to work out how it came about (interview 06).

In the view of some European unionists (interview 01) the climate within the EWC has changed completely with the closure of the Antwerp site and the negotiations about the Astra in Ellesmere Port. Some doubt that the members are still capable of discussing openly with each

other; one IG Metall representative even sees himself before 'a pile of rubble' (interview 04). The majority of our interviewees, however, feel that these images of destruction are completely inappropriate with regard to the EWC (interview 02). While cooperation sometimes works and sometimes does not, all parties involved are seen to be honestly willing to revive and strengthen cooperation (interview 03). Since the events in Ellesmere Port, the employee representatives have met again and continued their collaboration within the EWC. There are still frequent and intense meetings of the EWC (interview 08). Some German unionists feel that there is a strong basic constitution and a 'stock of capital' (interview 03) within the EWC which cannot be destroyed even if the promises of solidarity could not be kept at all times. The basic consensus on the importance of working together at European level is seen to be still intact (interview 02). This view is also shared by British unionists. For one, British unionists feel the EWC to be a great asset to them, especially because of the access to information about company policies that is provided due to German information requirements (interview 18). Also, besides these rather interest-based considerations, the mantra of the EWC in recent years, to find solutions to conflicts and not let conflicts grow, is felt to have worked very well (interview 17). The relationships between EWC members are felt to be strong enough and the body is perceived as mature enough to endure differences of opinion. At the beginning, 'everybody was a stranger. And today we don't have any strangers' (interview 17). National unions still work together closely on various projects (e.g. a youth project). No one among our interview partners is of the opinion that employee cooperation in the case of GM/Opel is at its end after the experiences of the crisis. Even though the recent events have shown the limits of transnational (union) cooperation and solidarity all interviewees still see the need to re-establish and strengthen cooperation. The negative past experiences should be seen as something to learn from for future collaboration (interview 04). Agreements within the EWC and working together as a team

are seen as the only possibility to counter the 'divide-and-rule'-tactics of management (interviews 03 and 17). The conclusion of EFAs with management is also still seen as an important – though legally weak – instrument by German and British unionists (interview 07). Although EFAs have been broken by management on various occasions, they are regarded a good thing by the involved unions, providing guidelines and keeping the company in check (interviews 18 and 19). British union representatives also point out that the EWC was accepted by GM management as a negotiation partner. The GM EWC is felt to be 'the best by far', because in contrast to other EWCs 'we negotiate' (interview 19). This is also why, in the eyes of British unionists, the recent reform of the European EWC directive did not change much since the GM EWC had always been a negotiating body going far beyond the statutory rights of European works councils (interview 19). And even though there have not been EFAs in the last years national or local agreements negotiations were coordinated at European level, as one interviewee pointed out.⁴

As pointed out above the economic crisis also had an impact on the VW company which was met with measures like relocation of production volumes and exchange of employees between (European) sites. These instances of cooperation have rather strengthened solidarity among employee representatives and unions. From the point of view of German unionists, the crisis did not have any negative effects on employee cooperation (interview 11). However, the economic crisis hit VW nowhere near as hard as GM/Opel and, generally, employee cooperation in the VW corporation takes place in a climate of 'share-the-gain' rather than 'share-the-pain'. Unionists can only speculate on how worsened economic conditions would affect transnational cooperation of the VW-employee side. On the one hand, a union representative suspects that cooperation would become more difficult if there is less to share. On the other hand, the norms of cooperation and solidarity among VW-employees are felt to be so strong that a situation like

at GM/Opel where one site engaged in concession bargaining against the others is perceived to be impossible at VW (interview 11).

Discussion and conclusions

We started from the premise that transnational collective action of labour does not automatically follow the territorial expansion of product markets but hinges on various preconditions. Contingent on both, material and symbolic resources within existing and newly emerging (sub-)fields of industrial relations we assumed a variation in the probability that transnational norms and practices of cooperation and solidarity can be established and sustained. Since with the exception of the EWC Directive, supportive regulative resources at European and World level were missing, individual and collective actors themselves needed to put efforts in 'institutional work' to create structures that in turn affect upon the cognitions, normative orientations and behaviour of labour (and management). Thus, apart from material resources and associational power, dominant institutional logics (i.e. belief systems and practices) in national and company fields were expected to either facilitate or hinder the evolution of transnational labour cooperation. The predominance of market logic and conflictual labour relations at enterprise level in combination with low levels of economic power on the side of labour, indeed required 'harder work' to build up transnational employee cooperation, as has been demonstrated with the GM/Opel case. Compared to VW, where regulation promotes cooperation ('the VW law') and norms and cultures of social partnership (notion of 'VW family') in company fields prevail and affect the orientations, identities and motivations for cooperative action of both management and labour, GM management was found to be the clear antagonist, fostering the logic of competition. There have been several breaches of EFAs by the GME management that was heavily influenced by its US-American headquarters. Increasing economic pressures at

GM/Opel during and after the crisis further accentuated the structural differences between VW and GM/Opel.

Our own evidence supports existing scholarly findings on the role of strong and recognized actors (EWCs, trade union actors) who can act as 'political entrepreneurs' in highly competitive environments or as 'Co-Managers' in cooperative cultures by framing interests or conflicts to create collective identities and norms of reciprocity (Greer and Hauptmeier, 2008, 2012). Yet, we question the perception that the 'national turn' and particularistic behaviour of German and British labour representatives during the economic crisis as well as personnel changes in the composition of the EWC at GM/Opel have eroded transnational solidarity and mutual trust relations. Important labour actors, who have left the EWC because of site closures or retirement, so the argument goes, take with them their personal networks and relationships that had sustained the culture of cooperation (Hertwig et al., 2013: 10). Although we found some evidence of an erosion of trust-relationships at GM/Opel in our interviews, firmly established norms and practices of cooperation and solidarity still have an effect independently of particular individual actors. Drawing on the institutional logics perspective we proposed to disentangle employee representatives' behaviour and normative and cultural-cognitive orientations to evaluate whether or not institutions of cooperation are intact or not. In both of our company cases in Germany and the UK, we still found strong evidence of institutional effects on the normative orientations, behaviour and emotions of labour actors also during the economic crisis. The logic of cooperation seems to have become the routine way of how to frame and tackle difficult situations, as can be seen by the solidarity of Polish unionists at GM/Opel who renounced some production units of the 'Zafira' in favour of the Bochum site during the economic crisis. The evolution of common understandings and the feeling that all labour representatives and their constituencies are part of a 'risk community' (Fetzer, 2008) contributed

to a sense of community and has facilitated solidarity among employee representatives even under highly competitive and worsening economic conditions. Even in instances where particularistic behaviour prevailed such as occurred at the GM/Opel site in Ellesmere Port (UK), we found that institutions of cooperation still impact on actors' cognitions and affects. Feeling a need to justify one's own deviant behaviour from expected norms and practices indicates that cooperative institutional logics still have an effect on social action and perceptions.

A comparison between GM/Opel and VW has demonstrated not only the differences in the extent of efforts that labour actors needed to invest to create and sustain a cooperative culture. The two companies also vary in terms of the strength of (trans-)national institutions and hence, the extent of power resources these institutions provide for transnational labour action. At the GM/Opel site in Bochum, for instance, labour representatives could maintain their role as *enfant terrible* within the larger community of European trade unions and EWC members. Workplace representatives repeatedly made concessions to keep production and employment (Blöcker et al., 2013: 55–56). In contrast to VW, GM/Opel labour representatives simply could not enforce cooperative behaviour on all of its international colleagues. While at GM such a deviant behaviour might be considered as a breach of concluded contracts (solidarity pledge, 'sharing the pain'), breaches of the principle of solidarity at VW would be felt to be personal affronts in the context of the 'VW-family'. At VW it is mainly the Germans on whom the functioning of the W/EWC is dependent and the asymmetry of power among transnational labour actors is larger and bolstered by VW law.

In this article we argued that existing approaches, i.e. macro-structural perspectives, rational-choice theories and actor-centred processual accounts of labour transnationalism fall short when it comes to understand and explain the (re)production, change and destruction of belief systems and practices of cross-border cooperation and solidarity in times of crisis. We claimed

and found evidence that firmly established norms and cultures of cross-border solidarity have effects on the behaviour and orientations of labour actors even under changing conditions at the micro-social (personal changes) and the organizational level (national turn of trade union behaviour). Thus, neo-institutional conceptions (institutional logics, organizational fields and institutional work) provide a fruitful analytical tool that accounts for the dynamic interrelationship between and changes in structures and actors in the study of labour transnationalism.

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Notes

1The interviews were conducted between November 2013 and May 2014. Most were face-to-face interviews, some carried out via the telephone. The interviews lasted between one and three hours. We interviewed trade unionists and worker representatives from different levels (national, regional, local, and workplace).

2An organizational field describes a 'community of organizations that partakes of a common meaning system and whose participants interact more frequently and fatefully with one another than with actors outside the field' (Scott, 2001: 56).

3 Only six of the German VW-sites belong to the Volkswagen AG. The other German VW-sites are separate companies (Volkswagen Sachsen GmbH, Automobilmanufaktur Dresden GmbH, Volkswagen Osnabrück GmbH). Only the Volkswagen AG has a company collective agreement, the other VW companies (as well as the other German Volkswagen brands Audi, Porsche and MAN) are members in the metal employers' association and apply the sectoral collective

agreement for the metal and electronics industry.

⁴ The last EFA on the 'Plan for the Future' for Opel was concluded in 2010.

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Interviews

No.	Date	Level	Function anonymized
01	07.11.2013	Europe	IndustriAll Europe
02	12.11.2013	National	IGM Head Office
03	12.11.2013	National	IGM Head Office
04	13.11.2013	National	IGM Head Office
05	13.11.2013	National	IGM Head Office
06	13.11.2013	National	IGM Head Office
07	20.11.2013	National	IGM Head Office
08	27.11.2013	Company	Works Council Opel
09	11.12.2013	Local	IGM Local Office Wolfsburg
10	11.12.2013	Regional	IGM Regional Office Niedersachsen and Sachsen-Anhalt
11	04.03.2014	National	IGM Head Office
12	05.03.2014	Company	Works Council VW
13	31.03.2014	World	IndustriAll Global