Cornell University
ILR School

Cornell University ILR School
DigitalCommons@ILR

Articles and Chapters

ILR Collection

1996

# The Europeanization of Labour: Structure Before Action

Lowell Turner
*Cornell University*, lrt4@cornell.edu

Follow this and additional works at: http://digitalcommons.ilr.cornell.edu/articles

Part of the International and Comparative Labor Relations Commons

Thank you for downloading an article from DigitalCommons@ILR.
Support this valuable resource today!

This Article is brought to you for free and open access by the ILR Collection at DigitalCommons@ILR. It has been accepted for inclusion in Articles and Chapters by an authorized administrator of DigitalCommons@ILR. For more information, please contact hlmdigital@cornell.edu.

# The Europeanization of Labour: Structure Before Action

**Abstract**
At national level, the development of effective labour movements has involved the interaction of two processes: the establishment of formal organizational structures, and the rise of rank-and-file pressure and protest. At European level, recent years have seen significant organizational developments; this article discusses the role of the European Trade Union Confederation and the emergent European Works Councils. As yet, however, there has been no parallel evidence of transnational labour protest, and indeed the obstacles are considerable. Nevertheless, institutional frameworks may create a 'political opportunity structure' which facilitates its emergence.

**Keywords**
labor movement, industrial relations, organizations, revitalization, labor unions, Europe

**Disciplines**
International and Comparative Labor Relations | Labor Relations

**Comments**

**Suggested Citation**
Turner, L. (1996). *The Europeanization of labour: Structure before action* [Electronic version]. Retrieved [insert date], from Cornell University, ILR School site: http://digitalcommons.ilr.cornell.edu/articles/763/

**Required Publisher's Statement**
© SAGE Publications. Reprinted with permission. All rights reserved.
Final version published as Turner, L. (1996). The Europeanization of labour: Structure before action. *European Journal of Industrial Relations, 2*(3), 325-344.

This article is available at DigitalCommons@ILR: http://digitalcommons.ilr.cornell.edu/articles/763

# The Europeanization of Labour: Structure before Action

*Lowell Turner*

*At national level, the development of effective labour movements has involved the interaction of two processes: the establishment of formal organizational structures, and the rise of rank-and-file pressure and protest. At European level, recent years have seen significant organizational developments; this article discusses the role of the European Trade Union Confederation and the emergent European Works Councils. As yet, however, there has been no parallel evidence of transnational labour protest, and indeed the obstacles are considerable. Nevertheless, institutional frameworks may create a 'political opportunity structure' which facilitates its emergence.*

## Vignette: Popular Passion in Rostock

2 April 1993[i]. From a makeshift stage blocking the street in front of the shipyards in the northern port city of Rostock, union leaders harangued a crowd of 5000. These were 'warning strikers', courageous men and women who, in circumstances of mass unemployment (40 percent or more in real terms), had walked off the job that day and marched in columns of protest from workplaces throughout the city. For most of them this was the first time they could take such action without facing the threat of Red Army intervention. In an unexpected show of solidarity, they protested at the unilateral decision of metal industry employers to rescind a scheduled pay rise. News reports later in the day would show this to be one wave in a swelling tide of over 100,000 eastern German warning strikers, who within a month would stage a determined, high-risk, and ultimately successful 2-week strike in the pattern-setting metal and electronics industries of the new German *Lander.* In eastern Germany the organization of labour had passed in a few short years from 'transmission-belt' communist-led unions, via a tentative but enthusiastic mass membership in the new incoming western unions, to a remarkable and well-organized mass movement that dominated German headlines over a 2-month period.

After *IG Metall* leaders finished militant speeches to roars of approval, a spokesman of the DGB *(Deutscher Gewerkschaftsbund,* German trade union confederation) rose to recount tales of international labour activity. On that very day, he reported, Italian unions were out on a 1-day general strike in protest at government policy, thousands of workers were on strike in the UK, and additional thousands called out in Maastricht by the European Trade Union Confederation (ETUC) rallied for jobs and other labour-supported demands within the single European market. Although the litany of simultaneous European labour demonstrations was impressive, few of the Rostock warning strikers showed interest. Italy, Britain, the Netherlands seemed distant from the day's exciting and immediate concerns. The crowd waited politely for the DGB speaker to bring the focus back home.

As a spectator/participant, I found it remarkable to hear European labour solidarity highlighted as a prominent theme at a union-led rally in eastern Germany. Crowd behaviour, however, demonstrated two juxtaposed realities for labour in contemporary Europe. On the one hand, in the face of widespread gloomy predictions of its demise, labour is alive, still strong in its potential expression as a movement - certainly in unified Germany where bargaining structures are comprehensive and effective. On the other hand, however, at a time of economic globalization when cross-national labour linkages appear both appropriate and necessary, there is as yet little popular interest in such international solidarity. This is true even in the 1990s in Europe, where cross-national union collaboration has progressed farther than anywhere else.

It is commonplace to assert that social movements give rise to new structures of representation, which may consolidate some of the gains made and then live on after the movements subside. In the worst case, such structures may finally become lifeless, distant from the rank and file, unrepresentative, overly bureaucratic, and even repressive. There is, however, another possibility: that new structures may offer channels within which movements of popular protest can take shape, to grow, expand, and make concrete gains. This is precisely what happened in
Rostock (and throughout eastern Germany in the years after 1989); it is perhaps not beyond the realm of possibility that a similar phenomenon could happen cross-nationally in Europe in the years ahead.

**The Europeanization of Labour: Institutions Precede Mass Action**

The lines of causality for institutions of representation in modern democracies run in many cases from popular protest to structure. Aggrieved social groups, such as the car workers in Flint, Michigan in 1937, or the black refuse workers in Memphis, Tennessee in 1968, rise up in semi-spontaneous mass protest that galvanizes community- and workplace-based struggle. Commonly, such protests occur as part of broader 'cycles of protest' (Tarrow, 1990): for the above examples, the mass upsurge of unorganized industrial workers in the 1930s and the civil rights movement of the 1960s. If successful (that is, if not fully repressed or dissipated), such movements may result in the establishment of new rights for the aggrieved along with mechanisms and institutions to promote and sustain those rights. Thus, in the above examples, both the Flint workers and the Memphis drivers secured union recognition and collective bargaining rights, ensuring rising wages and stabilizing a system of representation that made future mass protest less likely.

Organized labour and its structures of representation, therefore, offer many examples of a widespread causal process: social movements give rise to organization and institutionalization[ii]. In general, these processes occur at national and subnational levels[iii]. In the international arena, however, cross-national collaboration (among labour, peace or environmental groups, for example), rather than being movement-driven, develops through networking and further institution-building on the part of representatives of already established organizations (which themselves were the earlier products of social movements). In these cases, new structures of representation may develop either prior to or in the absence of mass mobilization. It is difficult to imagine, however, that in the long run such structures could

be effective - in other words, that the actors could acquire real power - in the absence of mass protest. Two scenarios thus appear possible: that such cross-national collaboration will amount to little in its ability to influence the policy of either national or supranational agencies; or that such cross-national collaboration will acquire meaningful influence if and when it is bolstered by mass protest.

This is the dilemma facing current efforts on the part of numerous actors to 'Europeanize' labour[iv]. The building of the ETUC, the 1989 Social Charter of the European Community and the 1991 Social Protocol of the Maastricht Treaty (based in part on the compromise between ETUC and its employer counterpart UNICE which opened the possibility of European-level framework agreements), recent legislation to require European works councils (EWCs) in large multinational firms - all of these impressive efforts reflect the building of new cross-national structures of representation by established representatives of national and supranational labour organizations, *in the absence of* mass popular demands or protest[v].

The preceding discussion is based on the notion that there are two overlapping but conceptually distinct aspects of a labour movement: mass protest (or at least its credible threat, as in a strike threat) and structures of representation. Historically, both appear necessary to the consolidation and maintenance of labour movement influence both in politics and in the economy. The Europeanization of labour, however, is characterized by only one of these: institution-building, so far largely in the absence of mass protest.

Conceptually, I argue that in spite of widespread scepticism on the part of observers and participants alike, there is in fact a European labour movement, more so today than there has ever been[vi]. Evidence is presented below to substantiate this claim. This developing labour movement, however, is based on networks of contacts and new structures of international representation; it is not based on or empowered by mass pressure or protest. Analytically, I argue that these developing networks and structures, that together define the European labour movement today, are a product of politics and strategy - on the part of both national and supranational actors (national union leaders, officials of the European Commission, institution-builders at the ETUC) - in a context of growing economic integration in Europe. The implications of this argument are the following: unless the new structures can open space for cross-national collective action or mass protest, the European labour movement is likely to remain a rather formal construct, stunted by its distance from mass action, limited in its power and influence within the European Union; and this is true even where European labour has had some influence: in the social dimension of new international regulation (Hall, 1994).

**The Evidence: Building Labour's European Superstructure**

Beyond defending national rules and institutions at home, perhaps the best thing that unions can do in response to growing economic integration is to build a cross-national labour movement (see, for example, Platzer, 1991; Altvater and Mahnkopf, 1993; Lecher, 1993; Hyman, 1995). Although progress has been slow, labour in Europe is farther along in this effort than are unions in any other region of the globe (Visser, 1996: 192). The biggest obstacle to the Europeanization of labour is closely related to the imperative to defend national bases: the contrasting interests and structures found among widely diverse national unions (Timmersfeld, 1992; Visser and Ebbinghaus, 1992). For this reason, cross-national labour collaboration and

organization will undoubtedly take shape in unforeseeable ways that differ substantially from national forms of organization.

Efforts at building a European labour movement are nonetheless real and can be seen both in formal structures, such as the ETUC, sectoral European Industry Committees (EICs), and the EWCs, and in growing informal networks of cross-national information exchange and collaboration. Below we consider evidence concerning the development of the two most prominent of these efforts: the ETUC, based in Brussels, and the recent drive to establish EWCs in large European multinational firms[vii].

**The European Trade Union Confederation**

The ETUC is an inclusive confederation of western European trade union federations, from countries within and without the EU. Also affiliated are the fourteen sectoral EICs. Founded in 1973 and based in Brussels, the ETUC has a long history of lobbying at European Community offices over a variety of social issues: from gender equality, protection for workers in cases of plant closure, and health and safety in the workplace in the 1970s, to the broader provisions of the Social Charter and action programme in the late 1980s and 1990s, to a more recent focus on jobs and macroeconomic policy[viii]. A growing organization with a staff of about 45 in 1995, ETUC anticipates future revenue increases and growing influence in Brussels, and has recently moved into a new headquarters building shared with the International Confederation of Free Trade Unions (ICFTU).

With only one remaining exception, all major labour (con)federations in western Europe are now members of the ETUC. With the Spanish and Portuguese communist union federations finally in (reflecting among other things the end of the Cold War), the French communist *Confederation Generale du Travail* (CGT, still generally considered the largest union confederation in France) is now the last remaining holdout (or exclusion, depending on the interpretation). Although the CGT campaigned to good electoral effect against 'Europe' in the September 1992 Maastricht referendum in France, many well-placed observers are predicting CGT membership in ETUC soon, for two reasons: first, with the Cold War over and all other prominent communist (and former communist) union confederations in western Europe now in the ETUC, it is only a matter of time before CGT leadership softens its line and their opponents in the ETUC (principally its French rivals CFDT and FO) give up their resistance; and second, the Maastricht social protocol will accelerate the pace of the 'social dialogue' between ETUC, UNICE and CEEP (the European confederation of public-sector employers), giving the CGT added incentive to be on the inside where it can influence bargaining demands.

In any event, membership is one thing but active participation and organizational commitment are another. ETUC faces a number of intransigent organizational problems. By its very nature, it is limited in what it can do as a confederation of (con)federations. Many of its prominent members, including the German DGB and the British TUC, are umbrella organizations at home that do not in themselves possess bargaining power. The ETUC is thus a long way from many of the real sources of industrial relations clout.

Beyond this organizational limitation, ETUC suffers from a widely diverse membership, not only in national origin but in structure (ETUC includes centralized and decentralized

(con)federations; those that are inclusive at the national level and those that contend with others for representation and membership; those whose member unions engage in autonomous collective bargaining and those used to a strong state involvement). There are also evident internal differences of interest (such as between unions from low-wage and from high-wage countries). Diversity of interests has led Timmersfeld (1992) to predict, from a study of member positions and coalitions on key issues, an insurmountable problem of collective action for the ETUC; while Lange (1992) predicts a 'fragmentation of interests' in debates over the social dimension, instead of a stable, class-based coalition around which the ETUC could coalesce as an organization. Visser and Ebbinghaus (1992: 222) have aptly described the ETUC as 'united but fragmented and with little internal cohesion'[ix].

National unions and federations, however, have surprised observers in the past by their ability, at certain times and places, to overcome great internal diversity to build cohesive organizations (by various means ranging from side payments to exceptional leadership to dramatic, defining actions such as strikes or participation in new political alliances). Diversity of structure and interest are obstacles that may well be surmountable if and when the commitment of actors to cross-national collaboration, based on other common interests, becomes substantial.

A number of national federations are frequently cited as the most committed at the European level; often mentioned, for example, are the Dutch, Belgians, Italians and, lately, the British. But even for these federations, the European commitment is typically expressed by the engagement of a few key players. Even in these best cases, it is questionable how much real commitment to European unionism exists among the broader ranks of national union leadership, let alone among the rank and file. Unless leaders and members can see tangible benefits, there is little incentive to focus beyond the plant, firm, or at most sectoral or national levels. This does not mean that key Europe-oriented national union leaders could not possibly bring along the troops at some future critical moment; but it does mean that the commitment to the ETUC of even the most committed rests on shaky national foundations until demonstrated otherwise.

If even the committed are not as committed as they appear, restricted German union engagement has been glaring and quite problematic for the future vitality and influence of the ETUC. On paper, things look fine. The DGB, by virtue of its size and relative wealth, is the largest financial contributor to the ETUC (about DM lm per year). German unions are active in the sectoral EICs, which as a result of organizational reform in 1991 now all have seats on the ETUC executive board. Because of its size, wealth, and relative success at home, the DGB arguably speaks with the most influential voice within the councils of the ETUC (Markovits and Otto, 1991). Participants claim, in fact, that the DGB is the only member with *de facto* veto rights in ETUC decision-making on issues of importance (although this is officially denied).

In spite of appearances, however, many participants (inside and outside the ETUC, including European-oriented German trade unionists) claim that as regards active participation, energy and commitment, German unions have been the critical missing player. Some maintain that German unions have never been very active beyond the above appearances, tacit veto power, and financial support. An often cited illustration of weak commitment is the fact that Franz Steinkuhler, former president of *IG Metall,* had a seat on the ETUC executive board for many years as a member of the DGB delegation but never once attended a meeting[x]. Others

claim that German union presence effectively vanished when the life-threatening problems of unification began in 1990. In either case, it is clear that an ETUC team without the enthusiastic participation of its most prominent members is not likely to contend for great influence within the EU[xi].

It is important to reiterate here the key role of the Franco-German alliance at the core of the EU. French officials with past links to the CFDT are scattered throughout the Commission (Jacques Delors, Commission President from 1984 to 1994, was a long-time CFDT ally) and have maintained close ties to their compatriots at the ETUC, where the CFDT also plays an active role. But again, the largest French labour federation, the CGT, remains outside the fold, completely absent at ETUC level[xii].

As if organizational problems of membership diversity and commitment were not enough, the ETUC faces a very practical external problem in its attempt to negotiate even the most modest non-wage framework agreements on specific, limited issues at European level: its principal counterpart, UNICE, has neither the interest nor the mandate to bargain. UNICE is a confederation of private-sector employers' associations from across western Europe, whose primary social dimension concern in Brussels is to prevent the passage of any binding legislation that will restrict employer discretion. UNICE will bargain with ETUC to produce nonbinding joint opinions or to delay or water down any possible Commission directives; but UNICE has little interest in negotiating substantive outcomes with ETUC, nor does UNICE possess any mandate from its diverse membership to engage in collective bargaining. In the substantive meaning of the term, ETUC is a prospective social partner without a suitor[xiii].

Given the above organizational and political problems, it is remarkable that the ETUC has played any role at all. External support has been crucial. Martin and Ross (1992) are surely right in their central argument: that supranational institutions of the EU, in particular the Commission, have played a critical, independent role in opening up space and facilitating the development of cross-national union collaboration (see also Jensen et al., 1995). This has enabled the ETUC to develop a range of activities and influence that would be considerably diminished without the Commission's political and financial support. It finances the European Trade Union Institute (in practice, ETUC's research arm) and the promising new Trade Union College, along with a plethora of meetings and activities that the ETUC undertakes as a designated social partner. Meetings with UNICE, for example, are facilitated and subsidized by the Commission, and the ETUC has in turn acted as a conduit for Commission funding for pilot meetings of prospective EWCs. Cross-national meetings typically involve heavy travel and translation costs, which are often covered by EU funds. Most important, perhaps, the Commission has designated the ETUC as the representative social partner for European employees, affording the ETUC stature in Brussels and drawing it into countless discussions, negotiations and dialogue' concerning social policy initiatives[xiv].

For a confederation of federations with so many demonstrable weaknesses, ETUC has had impact at the EU-level worth noticing. It led the campaign for the Social Charter (1988-9) and its subsequent partial implementation in the action programme (1990-3), the social protocol of the Maastricht Treaty (1991), and the continuing passage of binding social directives such as the 1994 legislation on EWCs. We cannot yet say that it has sparked, or reflects, the building of a truly European labour movement. The mere existence of these channels of communication and organization, however, along with the ETUC's entrenched position within

the councils of the EU in Brussels, provide a useful institutional framework for early efforts at cross-national union collaboration (Ross, 1994).

**European Works Councils**

Along with post-Social Charter debates on employee participation legislation and the recent wave of voluntarily established EWCs has come a new literature on the meaning and importance of this issue (e.g. Northrup et a l , 1988; Martin and Ross, 1992; Streeck and Vitols, 1993; Turner, 1993; Hall, 1994; Mertens, 1994). The Social Charter calls for employee rights to 'information, consultation and participation'. But the issue goes back to the 1970s, when workers and unions found national rights (where they existed) to information and consultation increasingly undermined as business went international. Early attempts to legislate such rights for all employees of large firms in the European Community culminated in an intense battle over the draft Vredeling Directive in the early 1980s. Although labour lost this battle against the combined opposition of European and American business and UK Prime Minister Thatcher's veto power, the issue reappeared in the Charter as a key element of the social dimension.

Once again, the British veto and united employer opposition prevented adoption of legislation on employee rights to information, consultation and participation which the action programme envisaged. Although employers face very different national rules on this issue in different countries (ranging from detailed codetermination rights for elected works councils in Germany to no legislated or broadly bargained rights at all in the UK), they nonetheless united in opposing EC legislation. While German employers, for example, may like their system at home for its contribution to workforce stability, training, high productivity and cooperation (Wever, 1995), they want the right to do business as they see fit in other countries. While UNICE endorses principles of information-sharing and employee participation (as stated in the Charter), it has consistently opposed binding legislation. Business on the whole favours *employer-led* participation (quality circles, employer-dominated information-sharing, profit-sharing and the like, especially at plant level) as opposed to *negotiated* participation (based on employee rights, up to and including participation at the strategic level; Turner, 1993). For these reasons, progress was stalled until 1994, when the Maastricht social protocol allowed the other Member States to act without the UK (thus escaping the British veto) and also introduced qualified majority voting on the issue of information and consultation rights. This finally enabled the long-term campaign of the ETUC (supported by DG V) to succeed[xv].

Although lacking veto rights in management decision-making (which German works councils to some degree possess), information and perhaps even consultation committees, to be phased in through company-level negotiations, will now become standard practice at large European firms[xvi]. Wolfgang Streeck's much-feared 'supranational neo-voluntarism' (Streeck, 1994) has given way surprisingly quickly to mandatory supranational institution-building.

In the meantime the ETUC, EICs, and national unions, with the support of DG V, have made a major effort since 1991 to establish forerunner EWCs in about a hundred large European firms. The Commission, for example, provided ECU 14m in 1992 and 17m in 1993 to finance the first rounds of meetings[xvii].

Although a special case that is not yet generalizable, the EWC at *Volkswagen* (VW), for example, is widely regarded in labour circles as worthy of emulation. The original initiative for

its establishment of a Euro-works council at VW came from the company's general works council *(Gesamtbetriebsrat)* in Wolfsburg. This body is made up of representatives from six VW plants in Germany; all of whom belong to *IG Metall.* The German *Betriebsverfassungsgesetz* (Works Constitution Act) provides not only for works councils at all workplaces of five or more employees, but for general works councils at firms with more than one plant. In addition, the law provides for 'conglomerate' works councils *(Konzernbetriebsrdte)* for firms that include more than one independent subsidiary. The VW EWC was established under this latter provision at a meeting of works council representatives in August 1990, and consisted of eight representatives from VW in western Germany and two from Audi, five from SEAT in Spain and two from VW in Belgium[xviii].The council planned eventually to bring in representatives from VW-owned plants in Sachsen, the Czech Republic and Slovakia - and by 1995 had done so.

The general works council promoted this EWC for a number of reasons: a desire to exert greater influence on VW's growing internationalization of production within Europe; concerns about social dumping, meaning the danger of increased VW investment in countries with lower wages and labour standards at the expense of investment in Germany; a desire to work with Spanish and Czechoslovak colleagues to help raise wages and labour standards in those countries; and disappointment with progress at EC level on legislating for works councils in European firms. The conscious intent of activists on the new VW EWC was not only to receive information and begin to negotiate jointly with VW management across Europe, but to use German law to set an example for the spread of EWCs at other firms.

VW management has taken a 'friendly' attitude toward the new EWC and was present at the founding meeting; and in February 1992, it formally recognized the council and its right to meet at company expense, receive information, and discuss issues of strategic importance with management (consultation rights). Leaders of the council expected such recognition and contractual legitimation from the start, if only because VW management places a high premium on cooperative relations with its already established works councils, especially in Germany, and because VW is in part a publicly owned firm that responds to pressure from the SPD-controlled state government of Niedersachsen (where the firm has its headquarters).

Even prior to formal recognition, works councillors already claimed important accomplishments. First, they set up a viable cross-national labour body that met regularly and laid the groundwork for an official role at Europe's largest motor vehicle firm. Second, they exchanged information among union and works council representatives from several countries and set in motion a regularized exchange and cooperation process to inform national and plant bargaining (Fuchs et ah, 1991; Mertens, 1994). Third, cross-national information exchange paid early dividends in bargaining outcomes: discussions at the EWC of a shorter work week in Spain were followed by concrete bargaining gains in this regard at SEAT[xix]. And finally, the council quickly achieved recognition, especially in union circles, as an attractive model for the spread of EWCs at European multinational firms.

The EWC at VW is clearly a special case, based as it is on German law, a powerful German works council and union, partial public ownership of the firm, and a tradition of labour-management partnership within the company. Yet this case is important in setting a standard of what is possible, stimulating strategies by others to strive for similar gains. For the present, similarly strong cases (exceeding the mandate of recent EU legislation on EWCs) appear possible only where national law in the firm's home country supports such employee rights (as

in Germany), and where an already existing and strong works council, with union backing, mobilizes for this kind of institution-building. Even in Germany, however, more typical in the early 1990s were the cases of GM-Europe (including Opel) and DEC[xx].

At *GM-Europe,* plant representatives from across Europe met in 1992, with Commission funding, to organize an EWC. Although GM-Europe moved its headquarters from Germany to Switzerland in the 1980s, Opel remains the dominant member of this family and operates under German law with strong works councils organized by *IG Metall* and a supervisory board with significant workforce representation. *IG Metall* works councillors from the flagship Russelsheim plant played a leading role in setting up the meeting, intending to follow the VW model. However, Louis Hughes, the participatory-minded president of GM-Europe (and former president of Opel), attended the meeting, listened to the discussion and arguments in favour of an EWC, and then simply announced that GM-Europe would not recognize the body, provide information, or pay future costs. Participation, he maintained, is fine on the shop-floor and in the plants, but not at an additional and expensive bureaucratic Euro-level far from the rank and file.

In 1994, however, workforce representatives from Opel and other GMEurope plants followed VW's lead to establish a conglomerate works council and demand new negotiations for establishment of an EWC[xxi]. With the passage of the new EU directive, management revised its position and agreed to negotiate. In 1995, discussions stalled over the conflict between GM's demand that elected representatives be employees of the company and union demands that full-time union officials also be eligible to run for the council positions. In November, the company finally gave in, clearing the way for the establishment of GM's new EWC *(Economist, 2* December 1995: 73).

Management's response at *Digital Equipment Corporation* was similar to that at GM-Europe. DEC plant and union representatives from ten countries met twice, in 1991 and 1992, with EC funding. Although the company refused to recognize this would-be EWC, the workforce representatives themselves decided to establish a permanent body for the purpose of information exchange. At their second meeting in 1992, they elected a Euro-works council and set up a number of working groups (to discuss such issues as layoff rules, health and safety protection in computer work, company strategies such as outsourcing, and pension funds). Although costs were a problem, these were manageable given the nature of the DEC representatives: they tended to be professional and technical, speak English (reducing the need for translation), and could exchange information rapidly by electronic means. By 1993, they claimed to have an effective network that had already enhanced bargaining capacities for particular cases in Germany and Belgium. When in 1995, responding to the new legislation, the company proposed a minimalist 'electronic' EWC that fell far short of the demands of employee representatives, the latter held firm in rejecting management plans[xxii].

EWC enthusiasts at DEC, in fact, viewed their unrecognized body as accomplishing the main positive function foreseen for EWCs in European firms: the exchange of information and the building of a cross-national network of plant activists. They argued that this outcome was in fact better than some officially recognized EWCs for which management paid the costs but also dominated the meetings, allowing little time for plant and union representatives to meet without management being present. At Moulinex, for example, a French company that bought the German firm Krups, EWC meetings followed the French works committee model, resulting

in the development of less cross-national exchange and networking than in the 'unofficial' DEC case.

Streeck and Vitols (1993) were probably right that EWCs, prior to the passage of the 1994 legislation, had only been established where a national government promoted this (as at French firms such as Bull and Thomson) or where a strong national union with participation rights in national legislation took the initiative (as at VW). They also assumed, however, that such bodies were not forerunners of legislated EWCs throughout the EU but rather the end of a neo-voluntarist line, in which market forces burst free of national regulation. This does not appear at all a foregone conclusion, especially now that Euro-legislation requiring at least crossnational information committees (in firms with 1000 or more employees with plants of at least 150 employees in two or more Member States) has been officially adopted. Certainly the activists involved in building both officially recognized and unoffical EWC networks have seen themselves as early participants in something bigger than supranational neo-voluntarism - and as it turned out they were right (Goetschy, 1994). Whether these new bodies of cross-national representation prove significant (as opposed to serving merely as window-dressing for a very limited social dimension) depends on quite unpredictable developments, including implementation of the new EU legislation, future social partner negotiations in Brussels, and the effects of network-spreading and nascent informally coordinated cross-national collective bargaining.

**Prospects for Expanding Cross-National Collaboration**

There is, therefore, now solidly in place a 'superstructure' for European cross-national labour movement collaboration. The institutional framework and the networks of exchange are densest in western Europe, within the EU. In addition, however, western trade unions, including the umbrella ETUC, have been active in eastern and central Europe since 1989, promoting the development of independent trade unionism and laying the groundwork for new future memberships as the European market expands eastward (Seideneck, 1993).

Prospects appear bright for the continuing expansion of such institutional arrangements and regularized contacts, both among union officials (e.g. within ETUC) and among elected workforce representatives (e.g. within company-level EWCs). As the European market continues to develop internally, there is more and more incentive for unions and other workforce representatives to collaborate (from information exchange to the coordination of bargaining demands and the mobilization of pressure on firms and governments). Although barriers of diversity among national unions in structure, interest and ideology remain important, other prominent barriers to greater cooperation appear likely to fall away, in particular the problematic Franco-German union commitment cited above. The French CGT, long excluded on ideological grounds, now appears set to move toward membership of the ETUC. And the powerful German unions, having achieved favourable settlements in the 1990s in the face of a renewed employer offensive at home (in the pattern-setting metal industry in eastern Germany in 1993 and in western Germany in 1994 and 1995), look to have stabilized their domestic position in unified Germany and may well be ready to engage more actively in the European arena.

If a European labour movement requires both structure and collective action, the former at least appears to be developing steadily. Institutions - such as the EWCs and the ETUC considered above - are growing in influence, comprehensiveness, and legitimacy. Most importantly, perhaps, these structures encourage a thickening web of cross-national union contacts, at firm, sectoral, and macro levels. Such contacts offer at least the possibility of growing labour networks that could underpin future cross-national labour collaboration, ranging from information exchange to mass action.

What is missing in the presentation of evidence here is precisely the latter: cases of cross-national mass action on the part of labour. For the most part, these simply do not yet exist. The emphasis in this article has been on structures of representation because that is where the action lies so far in the Europeanization of labour.

**Conclusion: From Structure to Action?**

Sidney Tarrow (1996) suggests that the most likely form of Europeanization for social movements may lie in national protest against European-level (EU) policy and its consequences. This is a sensible perspective: one can more easily imagine nationally-based labour protests against specific EU policies (German labour protest, for example, against EU policy that allows a Spanish or Portuguese construction firm operating in Germany to pay sub-German wage levels to its imported Spanish or Portuguese workers) than one can imagine European-wide labour protest against a common target (be it a corporation, business association, or EU policy). The explosive French strike wave of December 1995, aimed at government austerity policies in preparation for economic and monetary union (EMU), offers dramatic evidence in support of Tarrow's contention.

For this reason, the strategies of the actors, along with the political interaction and negotiation between different actors, appear to offer the most persuasive explanation for developing structures of cross-national collaboration. To a significant degree, actors engaged in the building of such bodies as the ETUC and EWCs are working against the prevailing tide. Market developments, the effects of increasing economic integration within Europe, push both ways: towards collaboration, to meet multinational firms and supranational agencies on the new international terrain; but also towards the sort of national protest which Tarrow highlights, against the increasingly strong (and for the losers potentially devastating) effects of the internationalization of markets. As for 'spillover', there does not appear to be any necessary logic at work within the expansion of EU responsibility that pushes toward cross-national labour collaboration; again, the opposite effect appears just as likely, especially given great diversity in structure, interest and ideology among national labour movements (Jensen et al., 1995). Indeed, well-informed observers have long argued that the ETUC would accomplish little (Timmersfeld, 1992) and the EWC would amount to no more than 'neo-voluntarism' (Streeck and Vitols, 1993). To the extent that such predictions have already been confounded, this reflects the uncertain outcomes of politics and the capacity of determined actors to collaborate, overcoming both institutional barriers and the deregulatory effects of market integration.

While Tarrow's scenario implies the rise of mass protest in part *against* structures of cross-national collaboration, an alternative scenario also exists for European labour. The new

structures examined in this article have been fought for and painstakingly developed on the part of both national and supranational actors. Is it possible that if such structures continue to develop, they could in time open up space (creating a 'political opportunity structure') for mass protests to move into channels of collaboration among European-minded activists and movements[xxiii]? Next to the proletarian internationalism predicted by Marx, such cross-national labour protest and collaboration - aimed only at the regulation of an increasingly competitive and international capitalist market economy - may seem quite tame. From this perspective, the ETUC and EWCs are mild indeed. Reinforced in time by mass protest, however, such nascent structures may well bolster the contemporary social-democratic mission in the post-Cold War world: to bring a measure of justice and regulation to the no longer fundamentally challenged market economy.

**Notes**

An earlier version of this article was presented at the annual meeting of the European Community Studies Association, 11-14 May 1995, Charleston, South Carolina. For helpful comments and advice, the author thanks Peter Coldrick, Jon Erik D0lvik, David Foden, Gary Herrigel, Richard Hyman, Richard Locke, Gary Marks, Paul Pierson, Harvie Ramsay, Sidney Tarrow, Kathleen Thelen, John Windmuller and two anonymous reviewers for the journal.

**References**

Altvater, E. and Mahnkopf, B. (1993) *Gewerkschaften vor der Europaischen Herausforderung.* Miinster: Westfalisches Dampfboot.

Barnouin, B. (1986) *The European Labour Movement and European Integration.* London: Pinter.

Fuchs, M., Uhl, H.-J. and Widuckel-Mathias, W. (1991) 'Europaischer VW-Konzernbetriebsrat', *Gewerkschaftliche Monatshefte* 47(11): 729-32.

Goetschy, J. (1994) 'A Further Comment on Wolfgang Streeck's "European Social Policy after Maastricht"', *Economic and Industrial Democracy* 15(3): 477-85.

Gorges, M.J. (1992) 'Interest Intermediation in the EC After Maastricht', paper prepared for the conference 'The Political Economy of the New Europe', Cornell University, New York, 13-14 November.

Hall, M. (1994) Industrial Relations and the Social Dimension of European Integration: Before and after Maastricht', in R. Hyman and A. Ferner (eds) *New Frontiers in European Industrial Relations,* pp. 281-311. Oxford: Blackwell.

Hoffmann, J. (1995) fThe Reform of the Trade Unions in Germany: Some Critical Remarks Concerning the Current Debate', *Transfer* 1(1): 98-113.

Hyman, R. (1995) 'Industrial Relations in Europe: Theory and Practice', *European Journal of Industrial Relations* 1(1): 17-46.

Jensen, C.S., Madsen, J.S. and Due, J. (1995) 'A Role for a Pan-European Trade Union Movement?: Possibilities in European IR-Regulation', *Industrial Relations Journal* 26(1): 4-18.

Lange, P. (1992) 'The Politics of the Social Dimension', in A.M. Sbragia (ed.) *Euro-Politics: Institutions and Policymaking in the 'New' European Community,* pp. 225-56. Washington, DC: The Brookings Institution.

Lecher, W. (1993) 'Perspektiven europaischer Kollektiwerhandlungen', in R. Bispinck and W. Lecher (eds) *Tarifpolitik und Tarifsysteme in Europa,* pp. 401-20. Cologne: Bund.

Mahnkopf, B. and Altvater, E. (1995) 'Transmission Belts of Transnational Competition? Trade Unions and Collective Bargaining in the Context of European Integration', *European Journal of Industrial Relations* 1(1): 101-17.

Markovits, A.S. and Otto, A. (1991) 'The German Trade Unions and the Challenge of 1992', *Business in the Contemporary World* (Winter): 69-79.

Martin, A. and Ross, G. (1992) 'Unions and the European Community: A Report to the Project on Labour in European Society'. Harvard: Center for European Studies, mimeo.

Mertens, V. (1994) *Europaweite Kooperation von Betriebsraten multinational Konzerne: Das Beispiel des Volkswagen-Konzerns.* Wiesbaden: Deutscher Universitats-Verlag.

Northrup, H.R., Campbell, D.C. and Slowinski, B.J. (1988) 'Multinational Union-Management Consultation in Europe: Resurgence in the 1980s?', *International Labour Review* 127(5): 525-41.

Platzer, H.-W. (1991) *Gewerkschaftspolitik ohne Grenzen? Die transnationale Zusammenarbeit der Gerwerkschaften im Europa der 90erjahre.* Bonn: Dietz. Ramsay, H. (1995) 'Euro-Unionism and the Great Auction: An Assessment of the Prospects for the European Labour Movement Post-Maastricht', *Labour and Industry* 6(2): 13-44.

Ross, G. (1994) 'On Half-full Glasses, Europe and the Left: Comments on Wolfgang Streeck's "European Social Policy after Maastricht"', *Economic and Industrial Democracy* 15(3): 486-96.

Seideneck, P. (1993) 'Vertiefung oder Erweiterung? Zu aktuellen Problemen der europaischen Gewerkschaftspolitik', *Gewerkschaftliche Monatshefte* 44(9): 543-52.

Shorter, E. and Tilly, C. (1974) *Strikes in France, 1830-1968.* Cambridge-Cambridge University Press.

Silvia, S.J. (1991) 'The Social Charter of the European Community: A Defeat for European Labour', *Industrial and Labor Relations Review* 44(4): 626-43.

Steinkiihler, E, ed. (1989) *Europa y92: Industriestandort oder sozialer Lebensraum.* Hamburg: VSA-Verlag.

Streeck, W. (1991) 'More Uncertainties: German Unions Facing 1992', *Industrial Relations* 30(3): 317-47. Streeck, W. (1994) 'European Social Policy after Maastricht: The "Social Dialogue" and "Subsidiarity"', *Economic and Industrial Democracy* 15(2): 151-77.

Streeck, W. and Vitols, S. (1993) 'European Works Councils: Between Statutory Enactment and Voluntary Adoption', discussion paper FS I 93-312, Wissenschaftszentrum Berlin.

Swenson, P. (1991) 'Bringing Capital Back In or Social Democracy Reconsidered', *World Politics* 43: 513-44.

Tarrow, S. (1990) 'Struggle, Politics, and Reform: Collective Action, Social Movements, and Cycles of Protest'. Western Societies Occasional Paper 21, Center for International Studies, Cornell University.

Tarrow, S. (1996) 'The Europeanization of Conflict: Reflections from a Social Movement Perspective', *West European Politics* 18(2): 223-51.

Teague, P. and Grahl, J. (1990) '1992 and the Emergence of a European Industrial Relations Area', *Journal of European Integration* 13(2-3): 167-83.

Timmersfeld, A. (1992) 'Chancen und Perspektiven europaischer Kollektiwerhandlungen', dissertation, Universitat Trier, November.

Turner, L. (1991) *Democracy at Work: Changing World Markets and the Future of Labor Unions.* Ithaca, NY: Cornell University Press.

Turner, L. (1993) 'The Single Market and the Social Europe Debate: Unions and the Prospects for Worker Participation in Management', in L. Ulman, W. Dickens and B. Eichengreen (eds) *Labor and an Integrated Europe,* pp. 45-79. Washington, DC: The Brookings Institution.

Turner, L. (1996) 'Beyond National Unionism? Cross-National Labour Collaboration in the European Community', in R. Locke and K. Thelen (eds) *The Shifting Boundaries of Labor Politics.* Cambridge: MIT Press.

Visser, J. (1996) 'Internationalism in European Trade Unions: A Lost Perspective or a New Agenda?', in P. Pasture, J. Verberckmoes and H. De Witte (eds) *The Lost Perspective f Trade Unions Between Ideology and Social Action in the New Europe,* Vol. 2, pp. 176-99. Aldershot: Avebury.

Visser, J. and Ebbinghaus, B. (1992) 'Making the Most of Diversity? European Integration and Transnational Organization of Labour', in J. Greenwood, J.R. Grote and K. Ronit (eds) *Organized Interests and the European Community,* pp. 206-37. London: Sage.

Weiss, M. (1992) 'The Significance of Maastricht for European Community Social Policy', *International Journal of Comparative Labour Law and Industrial Relations* 8(1): 3-14.

Wever, K. (1995) *Negotiating Competitiveness: Employment Relations and Organizational Innovation in Germany and the United States.* Boston, MA: Harvard Business School Press.

Windmuller, J.P. (1980) *The International Trade Union Movement.* Deventer: Kluwer.

---

[i] This section is based largely on my own participant observation in the events described. For press accounts of the 2 April warning strikes in Rostock, see 'Werftarbeiter im Warnstreik', *Frankfurter Rundschau,* 3 April 1993: 1,3; 'Warnstreik am Werftdreieck', *Hansestadt Rostock,* 3 April 1993: 13; and '20,000 auf der Strasse', *Ostsee Zeitung,* 3 April 1993: 1-2.

[ii] This is not to say that mass protest and/or a broader social movement are necessary conditions for the consolidation of enduring labour organization. In British and American labour histories, for example, craft unionism based on a monopolization of skills provided the most stable basis for lasting labour organization in the early decades of the TUC in Britain and AFL in the USA - although such craft unions rarely extended beyond a relatively privileged core of skilled white male workers.

[iii] For a general argument along these lines derived from a historical analysis of strikes, see Shorter and Tilly, who persuasively make the following argument: 'largely as a result of their own collective action . . . , organized groups of workers acquire places in the national structure of power' (1974: 8).

[iv] Note Richard Hyman's impassioned plea (1995) for the building of a crossnational European labour movement in the inaugural issue of the journal.

[v] On the ETUC, see Barnouin (1986), Gorges (1992) and Martin and Ross (1992). On the Social Charter, see Silvia (1991) and Turner (1993). On the Maastricht Treaty social protocol, see Hall (1994), Lange (1992), Ramsay (1995), Turner (1996) and Weiss (1992). On EWCs, see Northrup et al. (1988), Streeck and Vitols (1993); and *European Industrial Relations Review*
251, December 1994: 27-32 and 256, May 1995: 14-22.

[vi] For useful historical perspectives that also assess contemporary problems and prospects, see Ramsay (1995) and Visser (1996). For a lucid analysis of European integration's pressure on domestic unions (driving them to international collaboration) see Streeck (1991).

[vii] Earlier versions of the empirical sections on ETUC and EWCs appear in Turner (1996). On *EIC* history, see Windmuller (1980).

[viii] It is beyond the scope of this study to present details of the ETUC's history, organization, and proto-negotiations with its employer counterparts; for this the reader is referred to sources such as Barnouin (1986), Gorges (1992), Martin and Ross (1992), Silvia (1991), Visser and Ebbinghaus (1992) and Teague and Grahl (1990).

[ix] See also Jensen et al. (1995).

[x] But see Steinkuhler (1989) for a strong statement endorsing German union activism and cross-national union collaboration at European level.

[xi] Another reason cited for German unions' lack of interest in Europeanization is the central importance of the German economy within the EU (Hoffmann, 1995:111-12).

[xii] It is, of course, possible to imagine active cross-national union collaboration within the EU in which French labour does not play a central role. Because of the centrality for the EU of the Franco-German alliance, however, policymakers at the Council, Commission and Parliament look for Franco-German agreement on which to base enforceable decisions - and this logic extends to the ETUC and to UNICE as well. In any case, the CFDT is well

ensconced in cross-national union efforts within the EU; other non-French actors regret the absence of the CGT, an absence that reflects the only partial involvement of the French labour movement.

[xiii] To date the one substantive agreement reached with UNICE (though there have been several with CEEP) has been that on parental leave in December 1995; whatever its symbolic significance, this is so modest in its provisions that it will have minimal practical impact. Attempting to be a social partner when the other partner does not want to play is difficult even for the strongest of labour federations, as Swedish unions have learned in recent years. And since historically, union consolidation may to some extent be employer-driven (on the Swedish case, see Swenson, 1991), UNICE's position does not bode well for the expansion of ETUC's role and authority.

[xiv] See, for example, *European Industrial Relations Review* 244, May 1994: 25-32. The Commission's approach reflects the view of many EU governments that continuing economic and political integration in Europe requires a social dimension to sustain popular support. To establish EU-wide labour and social standards requires active lobbying and mobilization from key players such as the ETUC. This was certainly the view of past Commission President Jacques Delors and officials of DG V (the Directorate-General for Social Affairs), who have made an active effort to bring ETUC aboard.

[xv] The UK opt-out reduces the number of British-owned companies covered by the Directive, and makes possible the exclusion of British employees from representation on EWCs. But not only have many UK firms already established voluntary EWCs (United Biscuits was an early prominent example); almost without exception, companies which have agreed EWCs for their continental European workforces have included their British employees as well.

[xvi] The new law allows firms to negotiate their own EWC format with employee representatives up until September 1996, after which time firms are required to begin such negotiations. In case such negotiations should fail, employee representatives can demand implementation based on a default model appended to the new legislation. See *European Industrial Relations Review* 251, December 1994: 27-32 for the text of Council Directive 94/45/EC. An estimated 1200-1300 firms will be required to establish Euroworks councils under the new legislation *{EIRR* 247, August 1994: 3-4; *Economist, 2* December 1995: 73).

[xvii] Under fiscal duress, the Commission originally provided no funding for EWCs in its 1993 budget. The funds were not only restored but increased as a demand from the labour-sympathetic European Parliament, which demonstrates perhaps that Parliament is not quite as irrelevant as many assume.

[xviii] *BR Kontakt,* VW General Works Council newsletter, July 1991: 4; *European Industrial Relations Review* 202, November 1990: 3; Fuchs et al. (1991).

[xix] *BR Kontakt,* July 1991: 4. Note that as recession deepened and VW decided to close a plant in Spain, debate increased and cooperation became more difficult between German and Spanish EWC members. Such conflicts of interest, however, have not undermined the expansion of cross-national information exchange and collaboration under the auspices of the EWC (Mertens, 1994).

[xx] It is perhaps no coincidence that these two European MNCs are American owned. Nonetheless, the outcomes of attempts to establish EWCs at these companies are not atypical.

[xxi] *Industrial Relations Europe,* December 1994: 3.

[xxii] See *European Industrial Relations Review* 256, May 1995: 18.

[xxiii] For a useful perspective on this possibility, see Mahnkopf and Altvater (1995).