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GLOBAL UNIONISM: THE ROLE OF NATIONAL EMBEDDED INSTITUTIONS IN INTERNATIONAL CAMPAIGNS FOR WORKERS' RIGHTS IN MEXICO (2009-2012)[1]

Sindicalismo global: o papel das instituições nacionais em campanhas internacionais pelos direitos dos trabalhadores no México (2009-2012)

Sindicalismo global: el papel de las instituciones nacionales en las campañas internacionales por los derechos de los trabajadores en México (2009-2012)

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RESUMO

O artigo analisa como campanhas internacionais de direitos trabalhistas têm limitações em sua aplicação local. Em base ao estudo de caso de uma transnacional estadunidense na região das *maquiladoras* no México (2009-2012), o artigo demonstra que, à parte das estratégias aplicadas em movimentos sociais, as instituições nacionais, em modelos corporativistas de

[1] This article is an expanded and revised version of initial findings presented in the author's master's dissertation. It draws on the same empirical data, while substantially reframing the theoretical and argumentative dimensions of the research.

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relações de trabalho, são as variáveis que mais influenciam os resultados de uma campanha internacional.

Palavras-chave: sindicalismo, campanhas internacionais, instituições.

ABSTRACT

The article analyzes how international labor rights campaigns have limitations in their local application. Based on a case study of a US transnational corporation in Mexico's maquiladora region (2009-2012), the article demonstrates that, apart from the strategies applied in social movements, in corporatist models of labor relations national institutions, are key variables to influence results of an international labor campaign.

Keywords: unionism, international campaigns, institutions.

RESUMEN

El artículo analiza cómo las campañas internacionales por los derechos laborales tienen limitaciones en su aplicación local. Basándose en el estudio de caso de una empresa transnacional estadounidense en la región de las maquiladoras en México (2009-2012), el artículo demuestra que, aparte de las estrategias aplicadas en los movimientos sociales, las instituciones nacionales, en los modelos corporativistas de relaciones laborales, son las variables que más influyen en los resultados de una campaña internacional sobre el trabajo.

Palabras clave: sindicalismo, campañas Internacionales, instituciones.

1 INTRODUCTION

The expansion of multinational corporations (MNCs) poses challenging and often threatening issues for workers' rights. MNCs have strategies to suppress rights, including locating production plants where taxes, accountability, labor, and environmental costs are low. To become more competitive, companies take advantage of free trade agreements, joint ventures, Export Processing Zones (EPZs), partnerships with governments, and lobbies, amongst other kinds of maneuvers. Although labor unions and workers lack the same mobility of MNCs, they, along with other organizations, count on a range of options to counterbalance the power of multinationals: coalitions, International Framework Agreements, partnerships with Non-Governmental Organizations (NGOs), Global Unions, Works Councils, placement of chairs in international organizations, and involvement in the International Labor Organization.

The aim of this article is to analyze the relation between international labor campaigns and national corporatist models of labor relations. Specifically, this research addresses limits of international labor rights campaigns in the context of corporatist institutions in Mexico (2009-2012). The case study on Johnson Controls provides a valuable perspective for understanding how global labor solidarity interacts with national institutional constraints.

The research question is: How do successful international campaigns on labor rights fail locally? Thus, this research aims to contribute to the literature of embedded institutionalism by analyzing the interconnection between international labor campaigns and national corporatist traditions in Latin America, especially Mexico.

Regarding materials and methods, the research departs from a case study to employ a qualitative process-tracing approach: an international campaign promoted by the then International Metalworkers' Federation (currently, IndustriALL Global Union) to workers at maquiladora facilities of the US based multinational company Johnson Controls. The article is based on primary and secondary sources. Primary sources are semi-structured interviews with unionists and specialized researchers, newspapers, documents, e-mails, and letters of protests. Literature review is the basic secondary source. The main method is process tracing with causal inference.

This research has five sections, besides this introduction and the conclusions. In the following section, the article aims to analyze main theories in the field of Political Science and International Relations and discuss some gaps in the literature the research aims to fill. Next, the structure of labor relations in Mexico is presented to give a strong understanding for the next sections of why an internal corporatist Mexican tradition matters for international labor campaigns. Thus, a general view of the migration of US companies to Latin American countries, such as Mexico, helps contextualize labor exploitation and workers' organizing under free trade agreements. At the global solidarity section, a brief analysis of global efforts to denounce the labor conditions at Mexican maquiladoras is the antechamber of the final

section, and the latter finally presents the main argument of this article, which is, why institutions matter when building international solidarity. The final section concludes.

2 INSTITUTIONAL EMBEDDEDNESS: NATIONAL INSTITUTIONS AS THE MAIN VARIABLE OF INTERNATIONAL CAMPAIGNS

The literature on international social movements focuses on issues such as structure of political opportunities (TARROW, 1994), the boomerang effect (Keck and Sikkink, 1998), and strategic corporate targets (JURAVICH, 2007). In general, these theories emphasize the role of transnational campaigns on local situations of social inequalities, in terms that an international successful campaign would overcome and improve such national situations. This research advances the debate by demonstrating that national institutions are central variables for understanding international campaigns and its effectiveness. This article aligns with the perspective that national institutions are the main variables to be considered in shaping international campaigns (Mcadam; Mccarthy; Zald, 1996 *apud* Anner, 2009).

Building power and capacity for workers is one of the actual labor unions' main goals. Scholars of international social movements call attention to a varied spectrum of tactics and strategies for unions to achieve that goal. Tarrow (1994, p. 85) argues that "structures of political opportunities" are "consistent — but not necessarily formal or permanent — dimensions of the political environment that provide incentives for people to undertake collective action by affecting their expectations for success or failure". So, strikes, protests and Labor Day celebrations are examples of labor's institutions and are key for understanding the emergence of collective agency and its success. However, the author puts special attention on the potential agency of political repertoires, rather than contextualizing them in national environments that might limit such positive efforts (Tarrow, 1994).

Keck and Sikkink's (1998) "boomerang effect" theory argue that "When a government violates or refuses to recognize rights, individuals and domestic groups often have no recourse within domestic political or judicial arenas [... and] NGOs bypass their state and directly search out international allies to try to bring pressure on their states from outside" (Keck; Sikkink's, 1998, p. 7). In other words, according to the authors, international actors would have a positive effect on States as they would make institutional national changes viable through the international. Therefore, the authors ignore that national contexts might be resilient to international pressures and simply ignore or minimize them.

"Strategic corporate campaigns" calls attention to the possibility that, to answer corporations' power properly, labor unions and other allies should adapt dynamic circumstances, for example via campaigns that target strategic stakeholders (Juravich, 2007).

This approach puts special emphasis on the agency of labor unions, which means that they would be flexible enough to adapt to each circumstance according to workers' interests. As will be shown, not all unions attend to workers' interests in corporatist contexts and might be resilient to third-party efforts to organize workers and protect their rights.

Contrary to the above perspective, this research aligns with the view that national institutional environments also shape international strategies (Mccarthy; Zald, 1996 apud Anner, 2009). Yet, the article goes further in arguing that national corporatist institutions might be resilient enough to not incorporate efforts of international labor campaigns.

Institutional environments might be favorable or unfavorable for workers' rights. For example, when impartial national labor laws, effective accountability, and independent unions are strong, national institutionalism might be favorable for workers to access their rights. "Hard laws", or "legally binding obligations with appropriate third-party delegation" (Abbott; Snidal, 2000, p. 421), reflect in a spectrum of institutions (for example Constitutions) that create a "path dependence" (Collier; Collier, 2002) - as practices and norms - in which labor relations are embedded. Although economic and political transitions might influence labor union's access to more proactive agendas, embedded practices are not substantially affected. On the other hand, "soft laws", or "non-binding norms" (Haas, 2000, p. 43) reflected in international organizations might be enforceable based on the context. The Organization for Economic Co-operation and Development (OECD), for instance, requires a National Point of Contact to disclose, monitor, and denounce labor violations. OECD's mechanisms suggest high enforceability, even though it is limited for some countries. Softer mechanisms, however, have little power to advocate for labor rights. A counterargument to this claim could be that a company's ability to freely move between states, not structures, is the variable that influences in workers' rights. However, structures also influence a company's ability to move.

3 THE STRUCTURE OF LABOUR UNIONS IN MEXICO

Industrial Relations in Mexico are defined by *corporativismo* or a corporate system (LA BOTZ, 1992, p. 39). The corporate system is predominantly dominated by the State and hegemonically ruled by one party, the Institutional Revolutionary Party (*Partido Revolucionario Institucional* - PRI), in a triangular relationship with labor unions. Still, some specific labor unions – the "official" ones – influence the state-controlled system.

The Mexican Revolution (1910 - *circa* 1920) originated a unionism controlled by the state. Workers, both rural and urban, became one of the most important social groups leading the revolution. Contrary to an expected rationale in which workers would be aligned with the revolutionaries, the Casa del Obrero Mundial (COM) colluded with the Constitutionalists[2]

[2] The Constitutionalists would compose later (1917), under Carranza's administration, the Constitution of The United

Venustiano Carranza and Alvaro Obregón in 1915, forming the "Red Battalions" to fight *against* Zapata and Villa, on the condition that they would be entitled to organize unions in the country, amongst other requirements.

The promulgation of the 1917 Constitution largely legislated in favor of workers. Article 123 rejected conservative proposals and adopted measures to protect workers' interests. However, the Article also eliminated independent unions and increased State's participation in the country's labor relations. The establishment of Workers' Regional Confederation (Confederación Regional Obrera Mexicana, or CROM) in 1918 was another turning point for co-optation.

Currently both Article 123, section A, of the United Mexican States Constitution[3] - created in 1917 -, and the Federal Law of Labor (Ley Federal del Trabajo, or LFT) - created in 1931 -, are the starting points of private Mexican labor and employment relations (Bensusán, 2006, p. 315; Barrera, 1980, p. 248). Although the LFT is considered highly advanced, in practice it opens a wide field for a range of activities that don't benefit workers. LFT, for instance, is strongly influenced by the Executive rather than being based exclusively on legislative provisions. Therefore, labor decisions often aren't technical decisions based on the law, but relatively arbitrary decisions made according to the whims by the Executive branches: the Work Secretary (Secretaría del Trabajo*)* for the local level and the Federal Board of Conciliation and Arbitration (Junta Federal de Conciliación y Arbitraje*)* for the federal level[4]. In the Mexican case the right to strike - a fundamental right recognized by ILO (2016) -, is restrained by the Executive branch (López, 2009, p. 23; Robles, 2009, p. 41).

There are other barriers to freedom of association, collective bargaining, and independent unionism in Mexico: the "*paper unions*" *(*sindicatos de papel), union's registration and legitimation – under the mandatory "take a note" and entitlement principle (*toma de nota y principio de titularidad*) -, and the protection contracts.

Sindicatos de papel, or paper unions, are legally registered organizations that exist only formally, "on paper". In practice, they take advantage of legalities that also only work "on paper" - as the *toma de nota* and the *titularidad* principle - to establish themselves in a given company and to receive union dues *without* generating effective improvements for workers. *Toma de nota* is a problem for unions that wish to represent workers in Mexico for two main reasons: The first reason concerns state's participation in the capital-labor relations, described above; the second reason refers to another legal figure of Mexican law, the *titularidad* principle. According to this principle, the union that is registered in an Executive

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Mexican States (one of the main sources that regulates labor and employment relations in the country nowadays), a fact that makes clear the relevance of this group in the revolution (Camín; Meyer, 2000).

[3] Section B concerns state workers.

[4] Article of law 365 of LFT.

branch shall be entitled to represent the employees (according to the *toma de nota)*. Thus, once the union has the *toma de nota*, whether being a *sindicato de papel* or not, it has the right to "represent" the workers in a company. In other words, the law clearly prohibits union pluralism (Bahena, 2009, p. 72) and the competition for workers' representation by independent unions. Once a union – "paper" or not – is representing workers in a given workplace, it is hard for it to be displaced.

This situation of paper or company unions gives birth to workers' representation that are favorable to employers, as protection contracts (*contratos de protección*): these are contracts usually signed by law firms or other groups such as paper unions and might not represent workers effectively. Once signed, the collective bargaining agreement is registered in the Board of Conciliation and Arbitration and the employer cannot sign a contract with another union immediately because of the *titularidad* principle. The agreement generally provides the minimum required by law (Gardner, 2010a). Around 90% of collective contracts in Mexico are considered *contratos de protección* (Industriall, 2015), and these contracts are particularly visible in precarious job sites, such as *maquiladoras*.

The confidentiality of paper unions registered in the *Junta de Conciliación y Arbitraje* (JCA) is another factor that makes the fight against protection contracts more challenging "in such a way that, with a hidden contract, the name of the union who sells the protection remains covered, making the process of recovery of worker's rights even more difficult and risky to workers" (Robles, 2009, p. 42; my translation). Thus, even if workers wish to declare a strike they are not automatically recognized by the Executive power. Lacking the legal framework that recognizes their organization and coalition as legitimate, they also will not have their rights recognized by employers. In fact, according to LFT Article 929 employers may even argue against the right to a strike within 72 hours it started.

The ILO Convention 87, regarding freedom of association, was ratified by Mexico (International Labor Orgnization, 1948). By simple comparisons between the Mexican labor legislation and the ratified convention it is possible to find some inconsistencies: both the *toma de nota* requiring a union's recognition, and the *titularidad* principle[5] for legalizing almost permanently a paper union by the state are violations to the Articles two, three (Section 2) and four of the Convention. ILO's Article three, Section 1, is disrespected once unions that exist only on paper take the place of unions that should be elected. Finally,

[5] *Toma de nota* is the registration of unions with the Executive Branch, and has existed since the 1980s, and this is a problem for unions that truly wish to represent workers in Mexico, for two fundamental reasons. The first concerns the intervention of the State's participation in capital-labor relations. The second relates to another legal concept in Mexican law, the *titularidad* principle. According to this principle, a union that has obtained registration (*toma de nota*) with the Executive Branch (in our case, the *Junta de Conciliación y Arbitraje* - JCA) will be authorized to represent workers. Thus, once the union has obtained toma de nota (whether it is a paper union or not, whether it has good intentions or not), it will have the right to represent workers in a given locality. In other words, the law prohibits union pluralism (Bahena, 2009, p. 72).

protection contracts give the appearance of legality to Mexican labor relations, which also should be avoided under the Convention's article seven.

Another issue that affects union workers is the highly fragmented labor unions' structure, as well as the absence of a national central union in the country (Kay, 2011, p. 200), which restrains dialogue and convergence between unionists. This structure also hinders the union's internationalization, because once an institution outside the country has an interest in acting in Mexico, it finds that the country does not have a union organization representative enough to establish an immediate relationship. Finally, and as a consequence, unions are often so big and complex that they do not always act as paper unions, depending on the workplace. The most common phenomenon is the coexistence of labor unions that effectively represent workers and paper unions within the same confederation: "confederations prefer to perpetuate this phenomenon in order to not lose their control" (verbal information; my translation)[6].

4 THE U.S.-OWNED COMPANY JOHNSON CONTROLS AND THE BOOSTING OF *MAQUILADORAS* UNDER THE NAFTA: A BRIEF HISTORY

Johnson Controls (JC) is a multinational company with U.S. headquarters based in Milwaukee, Wisconsin (WI). In this article, we analyze two production plants targeted in more than ten international struggles in Mexico: FINSA (used to be located in the Puebla State) and *Interiores* (used to be located in the Tlaxcala State). Both can be characterized as *maquiladoras*.

The North American Free Trade Agreement (NAFTA) offered Johnson Controls facilities, and a cheap workforce and lower taxes to send manufactured products from Mexico to the U.S. The free trade agreement was signed between the U.S., Mexico, and Canada, and is formally dated on January 1st, 1994.

American FDIs favored the development of many *maquiladoras* in Mexico. In 1965, the Mexican government decided to implement a manufacturing export-oriented program, allowing the U.S. to build automobile manufactures along the border between the two countries (Kay, 2011, p. 50). Shortly after, *maquilas* expanded to other regions of Mexico, including the central and southern areas.

JC is a supplier of auto-parts. The devaluation of currency during the Mexican crisis in 1994, together with the signed agreement, led Mexico's exports to surpass the domestic market in the automotive industry. Before 1994 Mexico applied a 20% tax on all imported vehicles, and by 2004 this tax reached only 10% of vehicles imports. Additionally, 90% of trade

[6] Information provided by FES' researcher in Mexico. Interview provided in June 1st, 2012.

among the three countries was not taxed (International Metalworkers Federation, 2005, p. 35).

This company is chosen for this research as it represents a myriad of characteristics related to international unionism: a US-based multinational corporation, a free trade agreement, outsourcing, a case study that reached the International Labour Office and a Latin American country with internal issues that restraints fair practices of unionism. I argue in this paper that international solidarity is constrained by the previous national institutional practices, norms, and laws – to be shown in the following sections.

5 GLOBAL SOLIDARITY: WORKING AND LIVING CONDITIONS ATE THE PLANT LEVEL, AND UNIONS' RESPONSES

Before 2009, when the international campaign targeting JC was launched, part of both plant's workforce was subcontracted by a range of outsourced companies. Digit One was the most frequent labor supplier for JC (International Metalworkers Federation, 2009a, p. 24; United Auto Workers *et al*, 2010, p. 2). The case of One Digit at JC was an example of triple subcontracting, given that JC outsources to automakers that subcontract employees from other outsourced companies.

JC workers faced labor rights violations multiple times. This practice was more frequently related to the violation of fundamental rights outlined in ILO Conventions and Recommendations, and in the Mexican labor law. Violations included sexual harassment, dismissal of pregnant women, poor working conditions, and shifts over 12 hours. One Digit even deducted health insurance and union dues from wages, even though neither an independent union nor health insurance existed (International Metalworkers Federation, 2009a, p. 24-26; Ivanou, 2010a; United Auto Workers *et. al*, 2010). Moreover, both factories had protection contracts. One was adopted by a paper union in FINSA (*Confederación Regional Obrera Mexicana* - CROM) and the other by another paper union in *Interiores* (*Confederación de Organizaciones Sindicales* - COS).

Workers at JC FINSA built a coalition when they started looking for an independent union. This effort started before and ended after the unfolding of another similar story that occurred in *Interiores* and took four years. In October 2006 a group of FINSA workers met with the Non-Governmental Organization (NGO) Worker's Support Centre (*Centro de Apoyo al Trabajador* – CAT) to discuss their needs and the long-lasting inaction of the paper union. During the following months, the workers studied Mexican labor laws and collective agreements, establishing the Organizational Coalition of Workers at JC (*Coalición Organizativa de Trabajadores y Trabajadoras* en JC - COT-JC). At that time, workers didn't have access to their own contracts. After being asked to provide this information, the

company and the paper union started to threaten workers. In response to these conflicts, CROM announced a committee to deal with collective bargaining and review of payments for the first time, but they also intimidated workers in their workplaces, trying to discourage them from forming an independent union (International Metalworkers Federation, 2009a, p. 25-26; Ivanou, 2010a; United Autoworkers *et. al*, 2010, p. 1-5).

In parallel, the International Metalworkers' Federation submitted a complaint at the ILO against Johnson Controls which included several other labor rights violations in the country. The complaint was presented to the ILO Committee on Freedom of Association in February 2009.

Additionally, the International Metalworkers' Federation argued that Mexico participates in different international forums to promote human rights but doesn't practice them. The ILO also pointed out some contradictions inherent in the Mexican State, whose representative actively participated in the organization as a leader in various positions. At the same time Mexico has repeatedly refused to comply with the guidelines of the Committee of Experts on the Application of Conventions and Recommendations made by the Committee on Freedom of Association (International Metalworkers Federation, 2009a, p. 29-31).

Given this situation, the ILO proposed that the Mexican government should take appropriate measures, such as seeking a constructive dialogue with workers' organizations and employers about the *exclusión* clauses. They also suggested that the Mexican government should provide minimum representation for collective bargaining and take measures against the alleged bias and inefficiency of JCAs. ILO further asked the Mexican government to respond to statements relating to protection contracts and other cases presented[7]. The Committee's conclusions and proposals to the Mexican government were forwarded to the Board of Directors and later transformed into recommendations (International Metalworkers Federation, 2009b, p. 257-258).

Even before registering the complaint on ILO, IMF had promoted a global campaign against the Mexican government's protection contracts. The International Campaign Against Protection Contracts in Mexico maintained partnerships with civil society groups, such as the Universidad Autónoma de Mexico (UNAM) and other international organizations (IVANOU, 2010b). At that time, 400 workers from the *Interiores* plant signed membership cards with the independent union *Los Mineros*, supported closely by CAT (ESPINOSA [2010?], p. 1-4; GARDNER, 2010c) and workers went on strike. The plant's ability to supply major customers plummeted. Finally, workers won the right to be represented by the independent *Los Mineros* union (GARDNER, 2010d).

[7] PEMEX and Johnson Controls.

At the same time, several unions around the world (from Germany, Belgium, Slovakia, Spain, France, Poland and Czech Republic) showed their solidarity to FINSA workers. Solidarity was also shown by several institutions (European Metalworkers' Federation *et. al*, 2010).

In an agreement dated August 18, 2010, workers at JC *Interiores* were finally able to formally recognize *Los Mineros* as their union, following a four-day strike. The agreement included: 7.5% of wage increase (instead of 1% or 2% generally negotiated between the COS and the company), school aid increase, and improvement on life insurance for natural death and accidents at work (Jiménez, 2010; Ivanou, 2011).

The acquired benefits in *Interiores* plant led to a violent reaction by the former paper union. For example, the coalition began to suffer constant harassment and was threatened with death and hacking (Proyecto de Derechos Económicos, Sociales y Culturales *et. al*, 2010, p. 2).

Right after the violent responses, a broader and ambitious campaign of complaints against political, economic and institutional conditions of the workers in Mexico was launched by the IMF between 2009 and 2011.

The human rights group Proyecto de Derechos Económicos, Sociales y Culturales (ProDESC), together with CAT, sent letters to various national and international authorities, requesting investigation and security measures on the CAT case since the center was the advisor and provider of courses on labor rights to JC employees (Proyecto de Derechos Económicos, Sociales y Culturales; Centro de Apoyo al Trabajador, 2010, p. 2; 2011, p. 2). Another letter was sent to the vice president of JC in the United States, jointly written by IMF, Canadian AutoWorkers, United Steelworkers, United Autoworkers and *Los Mineros*.

All production units of JC in Mexico were linked to paper unions, and among all plants studied, only employees of *Interiores* managed representation of an independent union[8]. However, after some time these freely unionized workers of JC *Interiores* were fired on the grounds that the plant was not financially viable, despite a 15% increase in profits compared to the previous year (LOS MINEROS, 2012). The plant was closed.

6 (NATIONAL) INSTITUTIONS: WHY DO THEY MATTER FOR GLOBAL UNIONISM?

National institutions play the most important role in the corporatist model of labor and employment relations pervasive in Mexico. As shown in the cases studied, multiple national institutions (the State, labor laws, trade unions and their alliances) are tied to each other in Mexico. Since the end of the Mexican Revolution, the strongest labor unions have

[8] The interview was given in May 24, 2012.

been participating in the establishment of *Partido Revolucionario Institucional* (PRI), which has governed the country since the 1930's, with a short break from 2006 to 2012. Institutionalized white unions are legitimized and legalized through the State via the *toma de nota* and the *titularidad* principles. Therefore, Mexico is framed in a "'path dependent' pattern of change, in that outcomes during a crucial transition establish distinct trajectories within which [...] 'one damn thing follows another'" (David, 1985, p. 332 *apud* Collier; Collier, 2002, p. 27).

Companies and their codes of conduct are two institutions that have important influence in designing the outcomes presented in the case study. Johnson Controls' corporate governance has an aggressive anti-union policy. Even though ILO has recorded complaints against Johnson Controls, mentioning Puebla and Interiores cases, national and international pressure, and local strikes, the company didn't change its practices. Still, it was not the "social dialogue" among the company, the workers, and the Mexican government that led to the removal of paper unions and the unionization of both Puebla and Interiores factories. Rather, strikes, workers' organization and the recognition of an independent union by the state were the most important causal variables leading to unionization. These variables were central for the achievements of workers, even though the ILO's soft law exerted pressure on the government at that time. In other words, the company operates within legal limits set by the state, negotiating protection contracts with paper unions in a race to the bottom. Still, the company closed its production plants about one year after the workers began making moderate achievements at the workplace.

NAFTA deepened the business-friendly environment in Mexico. The agreement lowered taxes on exports from Mexico, encouraged companies to exploit the availability of cheap labor, fostered strategic partnerships between companies and paper unions, led to the proliferation of protection contracts, resulted in a lower collection of public taxes, and damaged the environment. So, NAFTA has been contributing to poorer living and working conditions for workers, deepening the exploitation of limited natural resources, avoiding public taxes, and increasing poverty levels nationally. Since NAFTA was formed while the PRI was in power and labor unions were part of the "revolutionary family", the Mexican market liberalization under the agreement is also a case of labor movement incorporation into the labor-based party, in which partisan loyalty promoted union-government collaboration, market reforms, and liberalization (Murillo, 2001).

The international campaign promoted by IMF and other organizations against Johnson Controls also shows some limits to strategic corporation campaigns, as proposed by Juravich (2007). Because JC is a supplier for other companies and not a vendor for final consumers, it was not deeply affected by strategies such as name and shame.

The partnership of national and international organizations with small independent unions is important, and it is important to promote free unionism in an interlaced system like Mexico's. In the corporatist system, coercion and state sanctions have the tendency of perpetuating trends of union organization and state-union structures. In other words, international efforts to give voice and power to small and "not-in-the-system" unions are constrained by previous local structures.

The results demonstrate that national institutions play the most important role in the corporatist model of labor and employment relations pervasive in Mexico. As shown in the case studied, multiple national institutions are tied to each other in Mexico. Therefore, Mexico is framed in a "path dependent" pattern of change. Furthermore, this situation favors anti-union corporate strategy: Johnson Controls' corporate governance has an aggressive anti-union policy. Even though ILO has recorded complaints against Johnson Controls, mentioning Puebla and Interiores cases, national and international pressure, and local strikes, the company didn't change its practices. In other words, the company operates within legal limits set by the state, negotiating protection contracts with paper unions in a race to the bottom model. In the corporatist system, coercion and state sanctions have the tendency of perpetuating trends of union organization and state-union structures.

In the case study, access to the national structure of political opportunities at first, followed by the boomerang effect when national demands were not answered by national institutions, and then by access to an international structure of political opportunities, ultimately contributed to a successful international campaign (which counted on a favorable ILO's legal opinion, the victory of independent unions and the unionization of production plants) are all strong indicators that the main explanation for the failure of an international campaign can be found in the corporatist Mexican labor relations regime. However, a further examination of local outcomes after the successful international campaigns coupled with international institutions suggests that institutions also shape the outcomes.

In sum, this article demonstrates that nationally embedded institutions in corporatist models of unionism have higher influence over the outcomes of international campaigns, particularly through the resilience of national institutions to external changes and the capacity of international institutions to enforce or promote such changes.

7 CONCLUSIONS

This article aimed to answer why successful international campaigns on labor rights might actually fail locally. The literature on international social movements focuses on issues such as structure of political opportunities, the boomerang effect, strategic corporate targets, and national institutions as the main variables to be considered in shaping international

campaigns. The research concludes that the Mexican national corporatist model of labor relations is the most relevant variable in explaining the outcomes of an international labor campaign. Although this is a case study based in Mexico, it raises reflection on other corporatist models through the Latin American continent.

The article advances the field of global studies by demonstrating through an empirical field how national corporatist unions influence international labor rights campaigns. This view contributes to a research agenda of institutional mechanisms of labor changes, the relation between labor practices and broader institutional reforms, and impacts of international efforts in a context of corporatist labor regimes.

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