Conceptualizing labor regimes in global production networks: uneven outcomes across the Bangladeshi and Sri Lankan apparel industries


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**Conceptualising Labour Regimes in Global Production Networks: Uneven Outcomes across the Bangladeshi and Sri Lankan Apparel Industries**

**Introduction**

This paper seeks to develop the labour regimes concept as a tool to better understand the uneven labour outcomes of global production networks. The labour regimes concept dates back to the 1970s when Braverman (1974) and Burawoy (1979; 1985) laid the foundations through their studies of workplace labour control. Subsequently, the concept has been advanced and refined by economic geographers in order to provide analytical purchase on the multi-scalar political, economic, and socio-cultural relations that produce and reproduce global production networks and their constituent workforces (e.g. Jonas 1996; Pattenden 2016; Mezzadri 2017; Smith et al. 2018). From this perspective, labour regimes are deeply embedded in, and intertwined with, *both* global production dynamics (e.g. contract manufacturing relations, global governance mechanisms, and transnational solidarity networks) and territorialised economic, political, and social formations (e.g. national institutional structures, domestic capital, national trade union structures, and local labour markets). These complex intersections mean that labour regimes not only vary at the national level, but also at the regional, local and workplace levels, even when connected into the same global production networks. By capturing the intersections of global networks of both capital and labour with territorially-specific characteristics across multiple spatial scales, the labour regimes concept thus shows strong potential for understanding the uneven labour outcomes within global production networks (Selwyn 2013; Mezzadri 2017; Baglioni et al. forthcoming).
In this paper we develop a multi-scalar conceptual framework that seeks to advance the concept of labour regimes in three main ways. First, while extant work on labour regimes has primarily focused on the control (governance) aspects of labour, we endeavour to incorporate the agency of labour more fully into one integrated analytical frame. This allows for more realistic appraisals of labour agency, as agency is always conditioned by, and formed in response to, the governance context in which it is situated (Coe and Jordhus-Lier 2011). Second, while capital as an actor has been well incorporated at the global scale (i.e. lead firms), labour as an actor at the global scale has been under-developed in existing theorisations of labour regimes. In this paper, we consolidate labour representatives at the global scale under the umbrella of international civil society organisations (ICSOs), and detail how they contribute to shaping labour regimes with interventions relating to both labour governance and labour agency. Finally, we offer a more refined approach to the different scales at which labour regimes are constituted, thereby helping to sharpen the analytical purchase of existing framings. More specifically, we parse the local and regional scales as interconnected but distinct domains in terms of shaping the intersecting dynamics of labour governance and agency.

We deploy these insights to compare and explain the very different labour regimes that exist in the Bangladeshi and Sri Lankan apparel industries, despite them being, on face value at least, enrolled into broadly similar global production networks. In so doing, we connect debates on labour regimes in global production to the vibrant literature on labour dynamics in South Asia. Within this work, many important studies have shed light on apparel labour conditions in Bangladesh (e.g. Kabeer 2002; Tighe 2015; Donaghey and Reinecke 2018; Saxena 2020; Anner 2020), India (e.g. De Neve 2009; 2014; Mezzadri 2017), and Sri Lanka (e.g. Lynch 2007; Hewamanne 2008; 2020; Gunawardana 2010;
2014; Goger 2013; Ruwanpura 2015; 2016). They have covered different aspects – notably the agency of labour and restrictions thereupon, labour control mechanisms, multi-stakeholder initiatives, ethical codes of lead firms, gender and patriarchy, health and safety, and the reproduction of labour – that are undeniably integral to labour regimes in these industries. In this paper, our aim is to build upon this work and develop an analytical approach, grounded in labour regime thinking, that is capable of integrating these different dimensions.

Our analysis draws on extensive original data, collected primarily through face-to-face interviews and focus group discussions, based on informed consent. Overall, 196 interviews including 14 focus group discussions were carried out across the Dhaka Region in Bangladesh (94 interviews and ten focus groups) and in the Western Province in Sri Lanka (88 interviews and four focus groups) between August 2018 and April 2019. The interviews lasted between forty minutes and one-and-a-half hours with participants that included lead firm representatives, government representatives, national trade unions, national civil society organisations, manufacturers and their associations, lead firm auditors, and ICSOs. The focus groups were conducted with workers at local trade union offices (averaging 10 workers each) and lasted 2-3 hours. In addition we visited 13 garment factories in Bangladesh and 16 garment factories in Sri Lanka (a mix of large, medium, and small-scale suppliers), both within and outside export processing zones. During these half-day visits, we spoke to the factory management and were given accompanied factory tours. Our primary data collection has been complemented with information derived from secondary sources, such as archives, corporate and government websites, state policy documentation, published information related to the apparel industry, and government and industry statistics.
The rest of this paper is structured into three main sections. The first, theoretical section reviews existing work on the concept of labour regimes, identifying both the progress made and gaps in extant work, before detailing a conceptual framework for understanding the intersecting dynamics that shape labour regimes in global production networks. The second section briefly contextualises the apparel industries in Bangladesh and Sri Lanka, highlighting both commonalities and differences relating to how the two have evolved. In the third section, we deploy our conceptual framework to empirically examine and compare the labour regimes of the Bangladeshi and Sri Lankan apparel industries. Eschewing simple explanations, our analysis details how on-the-ground labour regimes are forged by multiple intersecting dynamics.

**Conceptualising Labour Regimes in Global Production Networks**

In the pioneering work of Braverman (1974) and Burawoy (1979; 1985), labour regimes were primarily understood as the mechanisms through which labour is motivated and controlled in the workplace. Subsequently, this concept has been advanced by economic geographers and development studies scholars to capture a wider institutional structure that includes local social relations, the macro-politics of the state, and global production dynamics (Jonas 1996; Peck 1996; Mezzadri 2017; Smith et al. 2018). Importantly, in recent years it has been argued that the labour regimes approach is capable of incorporating the multi-scalar political, economic, and socio-cultural relations that produce and reproduce global production networks and their constituent workers (Selwyn 2013; Pattenden 2016; Mezzadri 2017; Baglioni 2018; Smith et al. 2018; Taylor and Rioux 2018; Coe and Yeung 2019). It thus has the potential to theorise the complex intersections of global production dynamics and territorialised social, political, and economic formations.
that produce specific outcomes for labour. Centrally, the labour regimes concept seeks to bring different facets of labour – notably labour agency, labour governance, and the labour process – into an integrated multi-scalar framework.

Among recent work in this vein, Smith et al.’s (2018) conceptualisation of labour regimes is particularly insightful in its nuanced analysis of both territorialised and global production dynamics. As they describe (2018: 556; our emphasis), labour regimes are “historically formed, multi-scalar phenomena resulting from the articulation of struggles over local social relations intersecting with lead-firm contracting practices in GPNs [global production networks] at the workplace scale”. In the Moldovan context, Smith et al. found labour regimes to be primarily shaped by three such dynamics: contract manufacturing pressures in the form of price and delivery times; the historical legacy of labour practices and labour movements; and national labour regulations. Their conceptualisation of labour regimes aligns with other studies which have pointed out that, while labour regimes may be experienced at the point of production, they can still be conditioned exogenously by dynamics operating at multiple scales including, but not limited to: transnational trade partnerships (Tran, Bair, and Werner 2017); international labour activism, hyper competitiveness of global industries, despotic labour markets, and authoritarian state control strategies (Anner 2015); the geographically uneven accumulation strategies of capital, workers’ spatial mobility, the configuration of specific kinds of accumulation spaces, and class and caste relations (Carswell and De Neve 2013; Pattenden 2016); and gender, reproductive dynamics, and sweatshop regimes (Mezzadri 2017; Baglioni 2018).

Indeed, these multi-scalar framings of labour regimes offer great analytical potential. In this paper, we seek to further advance such conceptualisations by sharpening the focus on
three specific dynamics that would benefit from further development in existing work. First, we bring labour governance and labour agency under one analytical domain, studying them as ‘two sides of the same coin’ and exploring their collective effects on labour regimes. With existing studies tending to prioritise governance aspects, our aim is to carve out more space for labour agency – both collective and individual – within labour regimes research. Indeed, some existing work on labour regimes has paid close attention to labour agency, providing insight into the conditions that limit or facilitate trade unionism and forestall conflict at the point of production, as well as the individual coping practices of workers against exploitative working conditions (Jonas 1996; Anner 2015; Baglioni 2018; Mezzadri 2017; Smith et al. 2018). What we are concerned with is linking these different aspects of labour agency more explicitly to labour governance; in other words, to explain how agency is shaped by different control mechanisms in different workplaces as well as how labour control mechanisms themselves are shaped by these different forms of agency, be they covert or overt. In so doing, our aim here is to provide a more nuanced discussion of labour as an agent of change as well as an agent of self-reproduction and control.

Second, and relatedly, we ask what happens to labour when the state fails to offer protection, when capital obstructs overt working-class action, and when national trade unions themselves struggle to represent workers due to structural constraints and/or their own limitations. In search of an answer, we look beyond the national context to examine labour as an actor at the global scale, for labour itself has global networks as much as capital (e.g. Brooks 2007; Seidman 2008; Cumbers, Routledge, and Nativel 2008; Anner 2015). Yet, while capital as an actor has been well represented at the global scale in labour regimes analysis (i.e. lead firms), labour has arguably been under-represented. To address
this gap, we focus on transnational labour organizations. These encompass global trade
unions, global civil society organisations, global labour campaigns, global consumer
campaigns, and international non-governmental organisations, among others, which for the
purposes of this paper, we group under the umbrella term ‘international civil society
organisations’ (ICSOs). Indeed, since the 1990s, there have been many instances of
collaborations and alliances built and negotiated with, and by, ICSOs to reduce forms of
exploitation at the workplace and implement improved governance mechanisms, especially
in territories where national regulatory institutions are weak. In fact multi-stakeholder
initiatives, such as the Ethical Trading Initiative (ETI) in the UK, and the Fair Labour
Association (FLA) in the USA, came into existence in the 1990s as responses to such
collective pressure from ICSOs (Hale and Wills 2007; McIntyre 2008; Ruwanpura and
Wrigley 2011). In turn, it is from the prescribed codes of ethics of the ETI and FLA that
most lead firms have derived their ethical codes. What we are concerned with here is
analytically isolating the role of ICSOs in shaping and re-shaping labour regimes both
individually, e.g. interventions of international trade unions and civil society organisations
in labour governance and agency, and collectively, e.g. through multi-stakeholder
initiatives, lead firm ethical codes, alliances, and accords.

Third, while the multi-scalar perspective offered by extant work on labour regimes is
highly useful and timely, it is crucial that the constituent scales are not seen as self-evident
and uncontested. The constitution of the different scales, and the specific relations that
distinguish them, thus need careful delineation. While Jonas’ (1996) concept of local
labour control regimes raises a similar concern in terms of how ‘the local’ is understood,
those challenges are amplified in a multi-scalar framework, such as the one offered by
Smith et al. (2018). More specifically, we diagnose that their framework merges the ‘local’
and ‘regional’ scales. From our perspective, the constitution of, and differences between, the local and regional scales are important to understanding the institutional structures, diversity of actors, uniquely shaped labour markets, and union positionalities that may be differently conditioned across those scales. Moreover, combining the local and regional scales may also obscure specific tensions within and between these scales that may unevenly shape labour governance and labour agency within those territories, particularly in contexts where governance is federal and multi-scalar. Thus, in our analytical framework we separate out the local and regional scales and demonstrate how the dynamics of labour governance and labour agency are differently constituted at those scales in ways that impact upon workplace labour regimes.

Towards an Enhanced Conceptual Framing of Labour Regimes

We define labour regimes in global production networks as spatially and temporally contingent systems of contested but co-constitutive relations among and between global production dynamics and territorialised economic, political, and social formations. Our theoretical proposition is that labour regimes are shaped by the intersection of labour governance and labour agency embedded in global production dynamics and territorially-specific characteristics. Within this intersection we identify labour, capital, the state, and ICSOs – which are all constituted at different scales from the workplace to the global – as the key actors shaping labour governance and labour agency. By including a temporal dimension, we recognise the changing political and economic conditions and relations between actors that continue to shape and re-shape labour regimes over time. Such changes can have differential impacts on: (a) how labour is governed; and (b) how labour responds to such governance mechanisms in a particular place and time.
The term governance, as used here, extends beyond the simple control or regulation of labour. This is because in global production networks, labour is being governed in many different ways. These include private governance by lead firms, multi-stakeholder initiatives, state regulatory mechanisms, international regulatory measures within trade agreements, and labour conventions such as the ILO core conventions (Hughes, Buttle, and Wrigley 2007; Donaghey and Reinecke 2018). Equally well established in the literature is the role of emerging bottom-up forces, such as social movements (also known as social governance) through labour organisations and ICSOs that apply pressure on states and capital (Gereffi and Lee 2016). In this respect, the term governance is used to represent a broad and integrated perspective that pays particular attention to the processes, enforcement, compliance, and monitoring of labour standards (Meardi and Marginson 2014).

Similarly, the agency of labour is understood to connote multiple scales of coordination from the workplace to the global as well as the temporalities over which workers are able to exercise their agency (Herod 2001; Coe and Jordhus-Lier 2011; Rainnie, Herod, and McGrath-Champ 2011; Selwyn 2013). In this context, the potential for worker agency is seen in two fundamental ways. First, agency is understood in terms of labour’s positionality in relation to different actors – e.g. capital, the state, and ICSOs – as well as the economic, political, and social contexts in which they are embedded across different scales (Coe and Jordhus-Lier 2011). Second, labour’s agency is also understood through specific worker practices. In this respect, agency is understood not just in terms of unionisation and social movements (Cumbers, Helms, and Swanson 2010; Anner 2015), but also workers’ lived experiences, how they defend their means of survival, and how
they stage acts of defiance and solidarity through everyday resistance practices (McGrath 2013; Gunawardana 2014).

Our conceptual framework for understanding labour regimes in global production networks is presented in Figure 1. While the framework is drawn in an apparently hierarchical manner, primarily indicating ‘top-down’ and ‘bottom-up’ flows of relations, the side arrows depict how relations between the different scales do not necessarily take a linear path. Instead, the framework acknowledges the entanglements of relations among and between actors across different scales (Sharp et al. 2000). This approach demonstrates how agendas are mediated in pursuit of specific economic, political, and social objectives through a mix of geographically distant and proximate relations across different scales (Allen 2011). While the framework is adapted from Smith et al. (2018), the additional components introduced here are indicated in blue.

As in Smith et al. (2018), our framework foregrounds the workplace in examining labour regimes. The workplace is where the dynamics of governance and agency play out and are actually experienced. Some of the workplace dynamics presented in Figure 1 closely resonate with the concepts developed in the earliest work on labour regimes, such as ‘managerial control’ and ‘factory regimes’ at the point of production (Braverman 1974; Burawoy 1979). The framework puts emphasis on the management discretion that shapes labour practices, such as employment relations, implementation of labour standards, and organising the production process. Other dynamics resonate with lead firm ethical codes and multi-stakeholder initiatives, and how they materialise at the workplace. Importantly,
however, the framework also incorporates methods of worker organisation in response to such control mechanisms, and alternative methods of representation. Equally importantly, attention is paid to the ongoing coping strategies of workers. The framework recognises the highly gendered nature of labour regimes, as well as identity politics materialised through caste and class relations, ethnicity, race, and sexual orientations.

The workplace, in turn, is integrated into a wider institutional structure spanning local, regional, and national political economies, and global production networks. For the purpose of understanding labour regimes, we conceptualize the local scale as the immediate community in which the production plant/factory is located, or a site of accumulation specifically constructed by capital/and or the state such as export processing zones (EPZs). It constitutes the lived-in spaces of workers and labour markets and encompasses reciprocities between the workplace and the local community (De Neve 2009; 2014; Carswell and De Neve 2013). Equally importantly, a closer look at the local scale helps explicate the particularities of collective action in terms of local trade unionism, how workers are mobilised, and immediate confrontations between trade unions and employers. These intimate details of the local scale can offer a deeper understanding of labour control as well as the labour agency that shapes workplace labour regimes (Peck 1996).

Moving beyond the local scale, the workplace is also seen as influenced and characterised by dynamics at the regional scale. We define the region as a sub-national administrative division that is home to several such localities, with their own inter-local variations. Those administrations may bring a distinct imprint to the labour regimes within their territory, in ways that will be closely shaped by scalar configuration of governance in particular
countries, for instance in terms of centralised versus federal, and unitary versus multi-level structures. In this respect, the framework recognises: (1) the tensions between national policies and sub-national labour policies, which may result in distinct regional policies on labour governance; (2) the regionally-specific accumulation strategies of manufacturers; (3) regional labour politics, characteristics of which may be specific to each region; (4) the unique composition of regional labour markets; and (5) the variable intersections of global production dynamics and territorialised regional characteristics. Collectively these dynamics engender unique regional identities as well as inter-regional variances influencing both labour governance and labour agency at the workplace (MacKinnon, Cumbers, and Chapman 2002; Lee 2007; Coe and Hess 2013). Owing to these specificities, the local and regional scales are separately delineated in our framework.

Next, identifying and exploring the dynamics that underpin and shape the national political context is critical to understanding the formation of workplace labour regimes, as they are heavily conditioned by the politics, policies, regulations, and class struggles that define national level labour standards (Anner 2015). To start with, this framework delimits the national historical trajectory in terms of political and economic context. It recognizes that territorially-embedded institutional structures and associated power relations will have pre-dated integration into global production networks. The institutions and regulatory frameworks that were present at the time of market liberalisation will undoubtedly have ‘set the tone’ for what followed and defined national regulatory and accumulative strategies, as well as labour politics. In terms of the contemporary political economy, the framework distils the strategies of the state, private sector, and labour representatives that operate at the national level. What this essentially means, in a general sense, is that workplace labour regimes – as we show in the two cases – are formulated in the context of:
the state’s attempts to accelerate industrialisation and (de)regulate labour markets; the
ttempts of capital to extract the maximum possible surplus value from labour; and trade
union and ICSO efforts to ensure labour rights and secure decent work. In a more refined
sense, however, these individual strategies and efforts need to be understood in terms of
how they are collectively mediated by relations and ongoing class struggles among and
between these three parties at the national level.

Finally, workplace labour regimes are understood as influenced by wider global production
dynamics through which the configuration of power relations among and between lead
firms, state institutions, manufacturers, trade unions, and ICSOs are deployed. In line with
other authors (e.g. Anner 2015; Mezzadri 2017; Smith et al. 2018), we recognise that
power relations between manufacturers and lead firms born out of contract manufacturing
dynamics – mainly associated with price and lead-time pressures – significantly shape
labour regimes at the workplace. At the same time, we remain equally sensitive to the
impacts of the pressure applied by lead firms on states at the national level and
manufacturers at the workplace to ensure better working conditions (Ruwanpura and
Wrigley 2011). Expanding further on the intersections of global and territorial dynamics,
we can distil: the influence of global regulatory institutions on national labour standards,
and the global pressure applied on states and capital (both foreign and domestic) through
ICSOs, manifested largely in the form of multi-stakeholder initiatives. This is particularly
important in contemporary global production networks, wherein workplace labour regimes
are increasingly shaped by multi-stakeholder initiatives negotiated and sustained between
lead firms, state institutions, national and international civil society organisations, and
manufacturers (Reinecke and Donaghey 2015). We will shortly mobilise this multi-scalar
framework to understand labour regimes and uneven labour outcomes across our two
cases. First though, we provide some important context on the apparel industries of Bangladesh and Sri Lanka.

**Research Context: Bangladesh and Sri Lanka**

Since the 1990s South Asia has become a ‘hot spot’ for apparel production (Gereffi 1999), accounting for 18.3% of global textile and clothing exports by 2018 (World Bank 2020). Apparel is the largest labour-intensive manufacturing industry in South Asia, with women making up the vast majority of the workforce (Hewamanne 2008; Ruwanpura 2011; Mezzadri 2016; Saxena 2020). Within South Asia, Bangladesh and Sri Lanka have emerged as notable apparel exporters since the 2000s.

Initiated in the early 1980s in the wake of market liberalisation, by 2019 the industry accounted for 86% of Bangladesh’s total export earnings and directly employed approximately 3.6 million workers (Statista 2021; The Asia Foundation 2020). Since 1983 it has been governed by the Bangladesh Garment Manufacturers and Exporters Association (BGMEA), which represented approximately 4,400 manufacturers by 2019 (BGMEA 2020). In 1996, the Bangladesh Knit Manufacturers and Exporters Association (BKMEA) was created to exclusively represent knit producers, representing approximately 2,300 knit producers by 2020 (BKMEA 2020). The industry is concentrated around eight Export Processing Zones (EPZs) and twenty three Economic Zones (EZs), managed by the Bangladesh Export Processing Zone Authority (BEPZA) and the Bangladesh Economic Zones Authority (BEZA), respectively.

The remarkable growth of the Bangladeshi apparel industry can largely be attributed to three factors: (1) an abundance of cheap labour; (2) the country’s trade policies since the
liberalisation of markets in the late 1970s; and (3) the easing of the EU’s Rules-of-Origin for least developed countries from 2011 and the granting of Generalised Scheme of Preferences (GSP) status from the USA (Lewis 2011; Saxena 2020), which allowed Bangladesh duty-free access to EU and US markets. While the USA’s withdrawal of GSP facilities for Bangladesh in the wake of the Rana Plaza accident in 2013 somewhat affected its progress in the US market, Bangladesh has still performed well in EU markets. As of 2019, Bangladesh was the second largest apparel exporter to EU markets, accounting for 19% of the EU’s total apparel imports (The Independent 2019). The industry accounted for 6.4% of total world apparel exports by 2019 (Statista 2020) and has remained a favoured apparel sourcing destination for major brands including, but not limited to, Bestseller, C&A, H&M, JC Penny, Marks and Spencer, Next, Primark, PVH, Walmart, and Zara (BGMEA 2020).

The Sri Lankan apparel industry also took off in the early 1980s following market liberalisation and associated trade policies (Kelegama 2004; Wijayasiri and Dissanayake 2009). Like Bangladesh, the Sri Lankan apparel industry remains buyer-driven, with the production process primarily controlled by lead firms. Although the export industry grew at a steady rate from its inception in the early 1980s, with the MFA phase-out from 1995-2005 and the absence of associated quota protections, Sri Lanka faced heightened competition from Bangladesh, China, and India (Kelegama 2004). To weather these adverse conditions and to strategise for the industry’s future, the state facilitated the formation of the Joint Apparel Association Forum (JAAF) in 2002. The JAAF has acted as the apex body for all textile and apparel related associations in the country and has championed numerous innovations in the apparel industry, especially in terms of higher value added products, processes, marketing, and organisational structures.
subsequent two decades, Sri Lanka has been able to upgrade its apparel industry and become a value-added manufacturer offering solutions for branding, design, and innovation (Goger 2013; Ruwanpura 2016). This development signifies a relative shift from ‘captive’ to ‘relational’ governance structures (Gereffi 2005), whereby key manufacturers in Sri Lanka enjoy greater autonomy and stronger partnerships with lead firms.

The impact of the MFA quota phase-out was also cushioned by the granting of GSP+ status to Sri Lanka by the EU in 2005, which provided Sri Lanka with zero duty access to EU markets and has seen the EU taking a progressively larger share of Sri Lankan apparel from 2005 onwards. As of 2019, similar to Bangladesh, Sri Lanka remained an apparel sourcing destination for major brands including but not limited to Bestseller, C&A, GAP, H&M, JC Penny, Marks and Spencer, Next, Nike, Primark, PVH, Victoria’s Secret, Walmart, and Zara (Sri Lanka Apparel 2020). The industry is spread across the country, including in its twelve EPZs, and is administered by the Board of Investment (BOI). From what started off as a 2% contribution to total exports in 1977 (CBSL 2009), the apparel industry has grown to claim 44% of total exports by value in 2019, becoming the main foreign income earner as with Bangladesh (BOI 2019). In the same year, the industry employed around 350,000 people in over 400 garment factories located across the island (BOI 2019).

With women labour accounting for around 80% of the total labour force as of 2017 (IPS 2017), the availability of a cheap and ready labour force has facilitated the growth of the industry in both countries to a significant extent. In Bangladesh, women’s labour – hitherto largely engaged in subsistence farming and agriculture – became the basis for the emergent
industrial elites to construct a class of export production workers (Saxena 2014; 2020). In Sri Lanka, through state rhetoric, the apparel industry was promoted in the wake of youth insurgencies in the late 1980s as an employment avenue for disenfranchised young people – largely male – to alleviate poverty. However in practice, instead of employing young men, the garment factories primarily opened their doors to the hitherto untapped labour pool of young women in the urban areas and villages (Lynch 2007). Indeed, in both countries, conserving patriarchal bonds within society proved to be useful for capitalists, both local and foreign alike, who sought to construct a pliant, disciplined, and cheap female labour force (Kabeer 2002; Lynch 2007). Through the rapid escalation of the industry’s growth in the ensuing decades, manufacturers have consistently been able to maintain this familial and patriarchal setup on their production floors.

Beyond the broad similarities, there are however profound differences in the labour regimes of the Bangladeshi and Sri Lankan apparel industries and which provided the inspiration for this study. Notably, the Bangladeshi apparel industry has continuously come under scrutiny for its exploitative labour practices. In fact, the Bangladeshi apparel industry is synonymous with ‘wage theft’, which encompasses under-estimation/incorrect estimation of overtime payments, denial of maternity leave with pay, denial of social security payments, lack of transparency in wage calculations, delays in payments, and denial of termination benefits (CCC 2014). Furthermore, workers, and specifically women, often face wage differentials, insecurity, and discrimination (Saxena 2014; 2020; Anner 2015; 2020). Similarly, the apparel industry in Bangladesh is known for excessive working hours, over which workers often do not have a choice (Tighe 2015; Anner 2020). Additionally, outsourcing, part-time work, temporary employment, and informality within the industry contribute to workers’ sense of extreme vulnerability, a situation Anner (2015)
calls a ‘despotic market labour control regime’. Child labour also remains a major concern in an industry where, according to a survey undertaken by the UNICEF in Dhaka in 2015, out of the estimated 185,000 workers surveyed, 59% were below the age of 18 (UNICEF 2015).

Furthermore, the health and safety of workers remains a serious concern with mostly ill-structured and overcrowded factory buildings, most vividly illustrated by the Rana Plaza building collapse in 2013 that killed over 1,100 workers. This situation is worsened by the inability of the state to effectively address the poor working conditions in the industry and the lack of representation of workers by trade unions. For instance, the weak enforcement of national labour laws, building codes, and city zoning laws has meant that factory owners are not held accountable for providing a safe working environment (Saxena 2020). The state is thus often accused of turning a blind eye to the loopholes in the system that enable illegal and abusive forms of labour practices by manufacturers, such as anti-union activities, non-compliance with minimum wages, and forced labour. Not surprisingly then, Anner (2020) identified Bangladesh as one of the top three labour rights violators among global apparel exporters, alongside China and Vietnam.

Sri Lanka, however, is renowned for having better labour conditions. This can be attributed to the high education levels, relatively higher labour standards, high social development indicators, and welfare state. These were institutionalised in the early 1900s as a result of Sri Lanka’s long history of defending workers’ rights and successful trade union movements (Abeyratne 2004; Gunawardana and Biyanwila 2008). Such legislation provided legal protection for workers in a wide spectrum of areas encompassing compensation, freedom of association and collective bargaining, industrial disputes, health
and safety, working hours, leave, employment of women and children, payment of gratuity, and termination of employment (Wijayasiri and Dissanayake 2009; Ruwanpura and Wrigley 2011; Ruwanpura 2016).

Building on these foundations, Sri Lanka became one of the first countries to adopt the ethical codes initiated by lead firms in the 1990s (Ruwanpura 2016). In this context, it is widely perceived that the overall workplace standards in the Sri Lankan apparel industry are better in comparison to other apparel producing countries (Wijayasiri and Dissanayake 2009; Ruwanpura and Wrigley 2011). This positive reputation of the industry is reinforced by its building safety standards such that, over the five decades of its existence, the industry has not reported any casualties (Ruwanpura 2016). Having noted that, it should also be stated that labour scholars studying the industry have found this reputation to be something of a façade, with workers labouring under low wages, long working hours, and discrimination without any meaningful form of representation at the workplace or national policy platforms (Hewamanne 2009; 2020; Goger 2013; Ruwanpura 2015; 2016).

In sum, even while the two industries exhibit broadly similar characteristics they also displayed significant differences, especially in terms of labour regimes (see Table 1). These differences hint at the complex and intricate intersections of global production dynamics and territorially-specific characteristics that produce contrasting labour regimes in the Bangladeshi and Sri Lankan apparel industries. We now move on to explore these intersections in more detail, deploying the conceptual framework developed earlier in the paper.

[Table 1 about here]
Labour Regimes in the Bangladeshi and Sri Lankan Apparel Industries

We present our analysis in two stages. First, we discuss the variable intersections of global production dynamics and territorialised characteristics (labour, capital, the state, and ICSOs) at the national level, and their impacts on the workplace. Next, we demonstrate the difference that regional and local specificities make to this intersection and the collective impact of these contested dynamics upon workplace labour regimes.

Intersection of Global Production Dynamics and Territorialized Characteristics at the National Level

Our research found that contract manufacturing relations between lead firms and suppliers – manifested in contract prices and delivery times – consistently resulted in low wages and long working hours, a finding consistent with other studies on labour regimes (e.g. Smith et al. 2018; Anner 2020). These dynamics were experienced and dealt with differently by Bangladeshi and Sri Lankan manufacturers, however, even though both countries largely supplied to the same lead firms. This, in turn, contributed to the distinctive labour outcomes in the two countries. As noted earlier, in Bangladesh the industry was primarily characterized by captive governance structures, whereby the power asymmetries between lead firms and manufacturers were wider than in Sri Lanka. Lead firms consistently used this power to drive down the bargaining power of manufacturers via various manipulative tactics such as ‘monopolizing’ the entire production capacity of certain manufacturers and threatening manufacturers with the withdrawal of business (Lead-firm/5; BD-Trading House/2). This squeeze on manufacturers considerably eroded their ability to negotiate higher prices and flexible delivery times, often resulting in low levels of profitability (BD-Technocrat/1). The implication on the ground was low wages and long working hours. These conditions were much worse for subcontractors (Tier 3 manufacturers), who often
bore the pressure of contract manufacturing relations between direct suppliers (Tier 1 and 2 manufacturers) and lead firms (BD-Manufacturer/10/11), a defining characteristic of what Wills (2009) has termed ‘subcontracted capitalism’.

The ability of lead firms to manipulate Bangladeshi manufacturers in this way was attributed to three national dynamics. First, in Bangladesh the administration of the industry was decentralised and the market entry of lead firms was not regulated by the state. Instead, the industry was governed across national, regional, and local scales by both public and private actors, including manufacturers. Second, the industry entered global apparel production networks as a low cost-capability supplier and has remained in that role (Joarder, Hossain, and Hakim 2010). Third, the Bangladeshi labour force has been perceived as largely illiterate with low capacity to learn and develop skills. As a lead firm baldly put it: “You need to understand what the situation is here… Bangladeshi literacy rate is very low… Bangladeshi workers are not educated… Uneducated people cannot expect to earn 16,000 taka [$200, in 2019]” (Lead firm/2). Thus, the Bangladeshi apparel industry tended to be a ‘price taker’, with limited ability to negotiate terms and conditions with lead firms (BD-Technocrat/1). This in turn had profound implications on how labour regimes were organised within workplaces.

In contrast, and again as noted earlier, Sri Lanka displayed a mix of relational and captive governance structures. Most Tier 1 manufacturers enjoyed relational partnerships with lead firms whereby the power asymmetries between lead firms and manufacturers were not so stark as in Bangladesh. The captive partnerships between Sri Lankan manufacturers (mostly Tier 2) and lead firms also differed in that lead firms did not exhibit the same manipulative behaviours in Sri Lanka that they did in Bangladesh. We attribute this to
three factors inherent to the national context. First, the Sri Lankan state exerted strong and centralised control over the market entry and subsequent conduct of lead firms through the BOI (Athukorala and Ekanayake, 2017). The entry grants for lead firms were subjected to a thorough vetting by the BOI and were only granted if the lead firms agreed to comply with national labour laws (SL-Government/6/9). This state control left less room for lead firms to manipulate the terms and conditions of work and squeeze manufacturers as they did in Bangladesh. Second, Sri Lanka was mostly seen as a producer of niche and value-added products, such as lingerie, sportswear, and high-end garments, while Bangladesh was a mass production site, for t-shirts and jeans, for example (Lead-firm/1/8). This was because Sri Lankan manufacturers were known among lead firms for their high production capabilities and a more educated and competent labour force, leading to better quality outputs (Lead-firm/3). Third, Sri Lanka was perceived as having high labour standards, with the relatively high levels of education amongst Sri Lankan garment workers playing a major role in developing and maintaining these historically strong labour standards (cf. Knutsen 2004; Ruwanpura and Wrigley 2011). One lead firm referred to Sri Lanka as “the best when it comes to complying with labour standards” (Lead-firm/1). Overall, these three aspects accorded a relatively higher bargaining power to Sri Lankan manufacturers in general, resulting in relatively better conditions at the workplace vis-à-vis Bangladesh.

At this juncture, it is important to recognise that the different ways in which contract manufacturing relations developed in the two countries were also shaped by historically-sedimented labour practices. Importantly, their post-colonial trajectories since the late 1940s resulted in two different institutional structures at the time markets were liberalised. Owing primarily to the aftermath of its independence from Pakistan in 1971, Bangladesh was struggling with a deteriorating economy and a corrupt and ineffective government
when initial liberalization occurred in 1977 (Lewis 2011). With a growing, unskilled population living in abject poverty, the country was heavily dependent on foreign aid (Wood 1997). The priority was thus to ensure economic growth, with social welfare standards pushed to the margins. As expressed by a government representative: “At this stage, we were unable to consider the workers’ job security, safety, etc. If we focused more on workers, we would not have been able to take our production ahead” (BD-Government/2). By that time, the state had considerably weakened and or politicised the previously strong national trade unions (Lewis 2011). As Saxena (2020) also noted, this paved the way for the emergence of a new class of capitalists who jointly drove the industrialisation project with the state. This state-capital alliance set the stage for strong relationships to be forged between manufacturers and the state on national policy platforms (Tighe 2015), resulting in a largely deregulated industry and labour market within which lead firms and manufacturers were given considerable freedom to shape sourcing and production practices.

In contrast, Sri Lanka was historically a welfare state with high social development standards at the time of market liberalisation in 1977 (Abeyratne 2004). Thus, at the inception of the apparel industry, strong labour legislation already existed (Ruwanpura and Wrigley 2011) and Sri Lanka also had a relatively stronger set of national trade unions. In fact, it was a combination of social movements (Biyanwila 2011) and trade unions that thwarted the combined efforts of state institutions and manufacturers to deregulate the apparel industry in the late 1970s. As one trade union put it:

…They wanted to relax labour laws in EPZs and grant freedom of operation to all investors to attract foreign investment. The Bill proposed the elimination of workers’ statutory rights and benefits, and other fundamental rights related to enabling rights, working conditions, etc. We sued against it [at the Constitutional Courts], and a team of five judges gave the
verdict in our favour. If we did not sue in 1977, we would be like Bangladesh today (SL-Union/1).

Consequently, the industry in Sri Lanka has been governed under one set of regulations, with universal labour laws applicable across the country, whereas in Bangladesh, national labour laws have not been applied in export processing and economic zones. In Sri Lanka, this institutional structure paved the way for the BOI’s establishment as the sole state authority mandated to regulate the industry, its labour laws, and the conduct of lead firms and manufacturers.

This historical context was also instrumental in shaping the contemporary state-labour-manufacturer relations on national policy platforms in the two countries. In Bangladesh, and as argued by others, state-manufacturer alliances continued to grow with manufacturers enjoying great power in the industry (Miller 2012; Saxena 2014; 2020; Tighe 2015). By 2019, around 60-70% of Bangladeshi parliament members had business interests in the apparel industry (BD-Union/5; BD-ICSO/6). Due to these close relations with the state, Bangladeshi garment manufacturers – represented by the BGMEA – had a significant say in how the industry was governed (BD-Union/5). This situation was compounded by the structural deficiencies and weaknesses of Bangladeshi national unions. Firstly, the multiplicity of unions working in the apparel industry – around 80 as of 2019 – led to severe union fragmentation on national policy platforms (BD-Government/2). A second characteristic of Bangladeshi labour politics was the conflicts of interests whereby, out of the thirteen labour leaders interviewed, five were accused by other unions of being allies of manufacturers (BD-Union/2/7). As a result, Bangladeshi unions have been largely unable to mount a united challenge to the state and manufacturers on national policy platforms (BD-Union 3/4; BD-ICSO/2).
In contrast, the relatively stronger influence of Sri Lankan unions on national platforms (SL-Union/6; SL-ICSO/1), the lack of involvement and less visible presence of manufacturers in the Sri Lankan parliament, and the broader state commitment to maintaining social welfare standards, have helped to safeguard core labour standards in the industry. Moreover, in relation to lead firm ethical codes, the existence of a solid set of national labour policies provided a strong base for these codes to build upon in Sri Lanka (Goger 2013; Ruwanpura 2016). Bangladeshi labour laws, given that they were not universally applicable across the industry and not strongly upheld, did not provide a solid foundation for lead firm ethical codes, and thus failed to deliver better labour conditions in the workplaces.

The prevailing labour conditions in the two contexts in turn shaped the nature and degree of ICSO interventions. While the same set of ICSOs worked in both Sri Lanka and Bangladesh, they tailored their strategies to suit the specific country contexts and labour needs. In Sri Lanka, due to its social welfare status and relatively higher labour standards, ICSOs did not directly intervene in the governance of labour. Their involvement was mostly evident in facilitating labour agency through building female leadership and unionizing factories. In that regard, we observed Sri Lankan unions actively working with ICSOs such as the Solidarity Center to promote specific policies, a condition enabled by the stronger position of Sri Lankan unions on national policy platforms (SL-ICSO/2).

By contrast, ICSOs emerged as key drivers of labour governance as well as labour agency in Bangladesh in the 2010s in response to numerous factory fires and building collapses (Anner et al. 2013; Donaghey and Reinecke 2018). These interventions forced lead firms, manufacturers, and the state to address exploitative workplace conditions in the industry.
and accept trade unions, which were heavily discouraged up until the early 2010s. The most notable examples are the two international coalitions – the Accord on Fire and Building Safety in Bangladesh and the Alliance for Bangladesh Workers’ Safety. Due to the strict approaches of the Accord and the Alliance, safety standards of over half of the export-oriented factories were significantly improved between 2013-2019 (BD-Union/2/4; BD-ICSO/1). Similarly, facilitation of trade unionism through training, capacity development, the provision of resources and pressure applied on the state and manufacturers increased the number of unionised factories from 32 in 2013 to 715 by 2019 (BD-Government/2). Bangladeshi trade unions thus came to considerably depend on ICSOs for the social protection that they lacked on national platforms and workplaces.

In sum, we have thus far compared the intersection of global production dynamics and national-level territorialised characteristics in the two countries, explicating the multi-scalar and variegated relations between labour, capital, the state, and ICSOs that shaped both labour governance and labour agency. In conditioning labour regimes, we have highlighted the centrality of the state, the politics of contract manufacturing relations, labour-capital-state intersections, the role of ICSO interventions, the strategies of national trade unions, and the historical legacies in which all these dynamics were embedded. These intersections have developed differently in the two contexts, profoundly shaping the differences in workplace labour regimes across the two industries.

**Sub-national Dynamics and Uneven Labour Regimes at the Workplace**

The national and global dynamics of labour governance and labour agency did not translate to the workplace in toto, however. For instance, when it came to labour governance, we saw demonstrable tensions between the national and sub-national scales which developed
differently across the scalar hierarchies in the two countries. Interestingly, the Sri Lankan case revealed that having a favourable set of state-capital-labour intersections at the national level, in combination with a solid set of core labour standards, did not always guarantee favourable working conditions for labour at the workplace (see also Hewamanne 2009; Gunawardana 2010; Ruwanpura 2016). While the workplace conditions in the Sri Lankan apparel industry remained relatively favourable across the industry (SL-ICSO/1; Lead-firm/1; SL-Auditor/2), such conditions were accessible for only a segment of workers, depending on their location, the service contract, and the choices workers themselves made in terms of where and when to work. In this context, we observed notably different labour regimes inside and outside the EPZs. Factories we visited in the localities outside EPZs broadly resembled the national level narratives when it came to workplace labour conditions. On the other hand, the EPZs displayed internally fragmented labour regimes, wherein one segment of workers enjoyed better benefits and state protection, while the rest of the workers in the same factory laboured under inferior conditions (SL-Civil Society/1/2). These were contract workers who were hired to fill the severe labour shortages suffered by the EPZs since the mid-2010s (Ranasinghe et al. 2016). In this system of fragmented labour regimes, contract workers were left vulnerable to a regime of work with little legal protection, no statutory benefits and hardly any rights (see also Hewamanne 2020). They were ‘owned’ and controlled by labour market intermediaries, often working outside of legal frameworks (SL-Union/2). While national trade unions were successful in initiating a Bill to regulate contract work in EPZs, their inability to come to a consensus on its terms had delayed the laws proposed to govern contract work (SL-Union/1/7).
Similarly, we found that varied patterns of labour activism between regions and localities in the two contexts differentially shaped labour regimes. Although Sri Lankan unions were relatively more visible on national platforms, their presence was less visible and much weaker at the local scale, as admitted by one labour leader (SL-Union/4). In contrast, while Bangladeshi unions were weaker on national platforms, they were considerably stronger at the local scale. We found that in the case of Bangladesh, this was due to the ICSO support – by the Solidarity Center and IndustriAll, specifically – that provided resources as well as legitimacy for Bangladeshi unions to mobilise workers at factories. In particular, Bangladeshi unions actively sought to organize factories that were supplying to the lead firms that these two institutions had connections with (BD-Union/3). In Bangladesh, these positive developments were spatially uneven in two ways, however. First, such activism was primarily confined to the region of Dhaka. This was because Bangladeshi labour leaders discriminated between regions – i.e. Dhaka and Chittagong, the two main apparel hubs – in order to remain in the leadership of the national level federation (BD-ICSO/4). The labour leaders, who were all based in Dhaka, ensured that they got re-elected by controlling the voting rights of factory-level unions. This meant that while factory unions had a right to vote for the national level leadership, labour leaders discouraged factory-level unions from exercising this right and gave less priority to organising factories in Chittagong (BD-ICSO/4). This neglect drove down the number of unions in Chittagong where, as of 2019, 30% of the factories were located (BD-Government/5). Second, the support offered by ICSOs was uneven in that most of them only worked with a select set of unions. Consequently, while the unions supported by ICSOs tended to be more resourceful at the local scale (BD-Union/9/12/13), others struggled for transnational legitimacy and the associated benefits (BD-Union/15). Thus, in Bangladesh, while ICSO interventions provided relief to a segment of labour, they nevertheless created inequalities in labour
activism and only reached a number of factories, reducing their ability to create meaningful change across the industry.

While Bangladeshi unions prioritised certain regions, Sri Lankan unions prioritised certain localities, thereby creating a fine-grained pattern of uneven labour activism across EPZs and villages outside the zones. This strategy was grounded in the socio-economic conditions in the respective localities. Unions cited difficulties in attracting members in village factories due to the relatively high social welfare standards in the countryside (SL-Union/4/6/13). EPZs, however, were purposely constructed working and living spaces that largely consisted of a migrant labour force (see Hewamanne 2008; 2009; 2020). As a manufacturers’ association put: “…the ‘pot’ here is very good for unions. There can be thousands of problems related to the migrant labour force, so unions are trying to exploit these” (SL-Technocrat/7). Given that EPZs employed less than 10% of the apparel workforce, this meant that the majority of workers in Sri Lanka were left unrepresented.

The uneven labour activism in both countries in turn played into the hands of employers who promoted alternative mechanisms of organisation at the workplace in place of unions. In Bangladesh, such mechanisms were called Participatory Committees (PCs), while in Sri Lanka they were called Social Dialogue Teams (SDTs) and Employee Councils (ECs) or Worker Councils (WCs) (Gunawardana 2014; Ruwanpura 2016). The format was strikingly similar in both countries, with these forums all being comprised of elected members of workers and management who met on a stipulated schedule to discuss workplace issues. An ICSO confided that “Managers see PCs as a very convenient replacement for unions” (BD-ICSO/2) and indeed in both countries PCs were accepted in place of unions by both lead firms and their auditors (Lead-firm/1; BD-Auditor/5). In
addition to these, employers created their own so-called ‘pocket unions’, a finding more prevalent in the Bangladeshi context. Pocket unions were primarily devised to deal with the pressure from ICSOs and lead firms – manifested through transnational activism in the wake of the Rana Plaza accident – to accept unions and yet still circumvent confrontational labour politics at the workplace (BD-Union/7; see also Reinecke and Donaghey 2015). In both countries these alternative mechanisms were confined to individual factories and did not have the workplace or associational bargaining power that mainstream unions had, nor indeed the industry expertise and experience. Coupled with the weaknesses of national unions themselves – namely uneven labour activism, fragmentation, and conflicts of interest – this situation contributed to a very low union density in both Bangladeshi (10%) and Sri Lankan (5%) workplaces.

Nonetheless, both Bangladeshi and Sri Lankan workplaces demonstrated other everyday practices of resistance. In some Bangladeshi workplaces, this meant deceiving the management in order to circumvent high production targets. For example, one worker pretended that she could only make 80 pieces when the supervisor asked her to do 100 pieces:

…Supervisor asked me how many pieces I did. I said 80 pieces but actually I made 100 pieces. Sometimes we have to go to the washroom and take a break, so we make few extras in case to cover up for the production for the time we take a break… We are cunning just like they are… (BD-Focus Group/1).

In other cases, the resistance of workers was evident through the frequent spot strikes wherein workers would walk out during disputes with managers. Spot strikes usually took the form of workers blocking the busy roads of Dhaka (BD-Government/5). In addition to these everyday acts of resistance at the workplace, Bangladeshi apparel workers also staged bold, collective acts of defiance and solidarity. For instance, between 2016 and
2018, the Bangladeshi garment industry saw two major wildcat strikes. The 2016 actions were started by a woman labour leader in a factory in Ashulia, a Dhaka suburb, with a demand to increase the then monthly minimum wage from $67 to $200 (BD-Union/4). Two years later, in the late 2018, over two million apparel workers – 60% of the total workforce – walked out across the country in anger over the minimum wage ($95) revisions (BD-ICSO/4). These strikes were somewhat successful in that both the BGMEA and the state agreed to raise the minimum wage, although by a nominal amount (BD-Union/3).

In Sri Lankan workplaces too, agency was amply evident through the practices and choices workers made in their daily lives (see also Gunawardana 2014; Hewamanne 2008, 2020; Ruwanpura 2015), although the way workers expressed this agency was different to Bangladesh. For instance, the strategies of Sri Lankan workers involved direct negotiation with the management at the workplace for better work conditions. Such negotiations included pushing for higher monthly incentives in return for increased efficiency (SL-Manufacturer/7; SL-Focus Group/3) and a reduced working week (SL-Manufacturer/2; SL-Focus Group/2). In the Sri Lankan case, resistance strategies were also evident in how workers negotiated labour shortages by choosing contract work and ‘factory hopping’ over regular work (SL-Focus Group/4; Hewamanne 2020). In this way, workers could to a certain extent circumvent labour regimes that impose unsustainable demands on their working lives (Carswell and De Neve 2013). In Sri Lankan workplaces, these choices not only altered the material conditions of work, but also the nature of local labour markets as was evidenced in the fragmented labour regimes. In sum, against the broader backdrop of constrained agency in both countries, what then emerged within workplaces were often
Conclusion

In this paper we have argued for an integrated labour regime approach to understanding the uneven labour outcomes of global production networks. Taking the Bangladeshi and Sri Lankan apparel industries as case studies, we have sought to empirically demonstrate the merits of our conceptual approach. In particular, the paper has looked to make three distinctive contributions to ongoing debates about multi-scalar labour regimes in global production networks (Smith et al. 2018). First, we adopted a dialectical approach to labour governance and labour agency, thereby addressing the sustained calls of economic geographers and labour scholars to theorise the co-constitutive relations of labour and global production networks (e.g. Herod 2001; Coe and Jordhus-Lier 2011; Rainnie, Herod, and McGrath-Champ 2011). This allowed us to make more realistic appraisals of labour agency, as agency is always conditioned by, and formed in response to, the governance contexts in which it is situated (Coe and Jordhus-Lier 2011).

Second, by according a greater role to ICSOs, we conceptually linked their interventions with labour governance and labour agency. This allowed us to isolate the specific roles ICSOs play in shaping labour regimes in global production networks alongside labour, capital, and the state – individually, as well as collectively through multi-stakeholder initiatives, alliances, and accords. Third, we revisited the extant scalar conceptualisation of labour regimes and offered a more finely grained analytical approach to distinguish and explicate the specificities of the local and regional scales. This allows the analytical
separation, for instance, of regional-level variations in union activity from the distinctive local labour markets and conditions that exist inside as opposed to outside EPZs.

In sum, we have conceptualised how labour regimes in global production networks are shaped, why they differ between locations, and how such differences engender uneven labour outcomes. The differences were shown to derive from territorially-specific characteristics and the ways that global production dynamics intersect with them, even though these territories may be plugged into the same global production networks. Crucially, using a labour regimes lens revealed that territorialised characteristics shaped the intersections with global production dynamics in five key respects: (1) the manner in which the historical trajectory and the political economy of the two countries defined how they initially integrated into global apparel production networks; (2) the way lead firms adjusted their sourcing strategies based on the entry requirements, capacity of and relationship with manufacturers, and the competence of the labour force in the two countries; (3) the way lead firms’ ethical codes differently intersected with national labour standards; (4) the manner in which state-manufacturer relations were formed and their implications for labour regimes; and (5) how ICSOs tailored their strategies and programs to suit specific country requirements based on the conditions and standards of labour regimes. In this respect, we have sought to make a productive contribution to the debates concerning labour in global production networks by offering analytical tools through which uneven labour outcomes can be examined, compared, and theorised.
References


The Independent. 2019. Bangladeshi apparel makers vent concern over EU-Vietnam FTA.


<table>
<thead>
<tr>
<th>Characteristics</th>
<th>Bangladesh</th>
<th>Sri Lanka</th>
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<tr>
<td>Broad similarities</td>
<td>1947</td>
<td>1948</td>
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<tr>
<td>Independence from British colonisation</td>
<td>Traditionally religious and patriarchal (predominantly Muslim)</td>
<td>Traditionally religious and patriarchal (predominantly Buddhist)</td>
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<tr>
<td>Opening markets to free trade</td>
<td>Late 1970s</td>
<td>Late 1970s</td>
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<tr>
<td>Integration into global apparel industry</td>
<td>Early 1980s through the Multi-Fibre Agreement</td>
<td>Early 1980s through the Multi-Fibre Agreement</td>
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<td>Key apparel markets</td>
<td>EU and US (79%)</td>
<td>EU and US (86%)</td>
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<td>Examples of key apparel buyers (lead firms) from 1990s onwards</td>
<td>Bestseller, C&amp;A, H&amp;M, JC Penny, Marks and Spencer, Next, Primark, PVH, Walmart, and Zara</td>
<td>Bestseller, C&amp;A, GAP, H&amp;M, JC Penny, Marks and Spencer, Next, Nike, Primark, PVH, Victoria’s Secret, Walmart, and Zara</td>
</tr>
<tr>
<td>Workforce</td>
<td>Majority rural women - around 80%</td>
<td>Majority rural women - around 80%</td>
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<tr>
<td>Labour representation</td>
<td>Low</td>
<td>Low</td>
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<td>Contrasts</td>
<td></td>
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<tr>
<td>Value of the apparel industry</td>
<td>$34 billion as of 2019</td>
<td>$5.3 billion as of 2019</td>
</tr>
<tr>
<td>Contribution to the national economy</td>
<td>80.7% of total exports as of 2017</td>
<td>44% of total export as of 2019</td>
</tr>
<tr>
<td>Role played in apparel production networks</td>
<td>Largely an assembly line manufacturer</td>
<td>Value added manufacturer</td>
</tr>
<tr>
<td>Working conditions</td>
<td>• Extreme forms of worker abuse including forced labour</td>
<td>• Reputed as an ethical production site in the world</td>
</tr>
<tr>
<td></td>
<td>• Poor building safety resulted in multiple fatal accidents</td>
<td>• Zero incidents related to safety or otherwise reported</td>
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<td></td>
<td>• Prevalence of child labour</td>
<td>• Zero child labour reported</td>
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Figure 1: Conceptualising Labour Regimes in Global Production Networks. Source: developed from Smith et al., 2018, Figure 1.