

DOCUMENT DE TRAVAIL

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**N° 49**

novembre 2005

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D'ETUDES  
DE L'EMPLOI**

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# Economic Regionalization and Industrial Relations

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N° 49

Novembre 2005

ISSN 1776-3096  
ISBN 2-11-095631-3

# **ECONOMIC REGIONALIZATION AND INDUSTRIAL RELATIONS**

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## **ABSTRACT**

The emergence of new levels of regulation of industrial relations, such as NAFTA or the European Union, in the regulatory apparatus from the workplace to globalization challenges industrial relations theories and models which have traditionally been elaborated within national contexts. Although the issue of economic regionalization as a new level of regulation might appear simple to deal with, it in fact requires a clarification of some of the fundamental concepts in industrial relations. Given the multidisciplinary characteristic of this field of study and its scientific community, industrial relations concepts have not necessarily been elaborated in an incremental way, one generation of scholars building upon and developing earlier theories. Nor has theory building in industrial relations been a conscious and coherent collective enterprise. To survey some of these theories may resemble trying to put together the pieces of a puzzle and finding out that some of the pieces are missing. Nevertheless, it is a necessary task not only in order to avoid the pitfalls of a common and practical industrial relations vocabulary – which often means different things in different countries and languages – but also if industrial relations studies are to grow from the national to the regional or supra-national levels and still be able to keep the same concepts. These concepts thus need to be revisited with a global perspective in mind and such is the object of this paper.

**Key words :** industrial relations, theory, globalization, Europe, economic regionalization.

## ***Regionalisation économique et relations professionnelles***

### ***Résumé***

*L'intégration de l'Europe ou l'émergence de l'ALENA en tant que niveaux de régulation des relations professionnelles remet-elle en question les théories et modèles de relations industrielles qui ont, de la « Démocratie industrielle » des Webb à la « Transformation des relations industrielles » de Kochan, Katz and Mckersie, traditionnellement été élaborés dans des contextes nationaux ? Étant donné le caractère pluridisciplinaire de ce champ d'études, les concepts en relations professionnelles n'ont pas toujours été élaborés de manière incrémentale, une génération d'auteurs s'appuyant sur et développant des théories précédentes. L'élaboration théorique en relations professionnelles n'a d'ailleurs pas fait l'objet d'un effort collectif conscient et suivi. Bien souvent des développements théoriques se trouvent esquissés en filigrane au sein de travaux plus orientés vers l'analyse de problèmes pratiques. Un survol des théories en relations professionnelles et une clarification de certains de leurs concepts fondamentaux sont donc nécessaires, non seulement afin d'éviter les malentendus d'un vocabulaire pratique et commun aux relations professionnelles – qui néanmoins signifie parfois des choses différentes dans des pays différents – mais aussi si les recherches doivent s'élargir progressivement du niveau national au niveau transnational tout en étant capables de continuer à utiliser les mêmes concepts. La question de l'Europe ou de l'ALENA en tant que nouveaux niveaux de régulation des relations professionnelles, pourrait paraître simple a priori, mais pose au moins deux problèmes théoriques complexes : celui de l'agrégation et celui de l'articulation des niveaux de négociation. L'objet de ce texte est de revisiter quelques théories des relations professionnelles pour déterminer comment elles ont traité ces problèmes théoriques et comment elles peuvent être utilisées (ou pas) pour analyser la question de la régionalisation économique en tant que niveau de régulation des relations professionnelles.*

**Mots clefs :** *relations professionnelles, théorie, mondialisation, Europe, régionalisation économique.*

## **INTRODUCTION<sup>1</sup>**

The emergence of new levels of regulation such as the European Union or NAFTA challenges industrial relations theories and models which have traditionally been elaborated within national contexts. Although the issue of economic regionalization as a new level of regulation of industrial relations might appear simple to deal with, it in fact requires a clarification of some of the fundamental concepts in industrial relations. Given the multidisciplinary characteristic of this field of study and its scientific community, these concepts have not necessarily been elaborated in an incremental way, nor has theory building been a conscious and coherent collective enterprise. Nevertheless, it is necessary to survey some of these theories in order to avoid the pitfalls of a common and practical industrial relations vocabulary which often means different things in different countries and languages and is applied to the national and transnational levels alike. These concepts need to be revisited with a global perspective in mind and such will be the object of this paper.

The paper starts with the notion of “industrial democracy” which was so important in industrial relations thought at the turn of the last century. Institutional mechanisms for worker representation emerged as industrial relations systems were set up. Even though they vary from one country to another, they are a common feature of national industrial relations systems and need to be considered at the European and global levels as well. The paper then examines the question of whether the European level of industrial relations should be perceived as an emerging new system of industrial relations on its own right or as just a supplementary level to be added to what exists at the national levels, through the analysis of the theoretical problem of aggregation and also examines the related issue of the articulation of different levels of bargaining. Finally some orientations for further research are suggested about the interplay between economic change and industrial relations rules.

### **1. THE QUEST FOR “INDUSTRIAL DEMOCRACY”**

The industrial revolution brought with it industrial conflict about the definition of the conditions of work and employment but also about the recognition of labor unions representing the interests of the workers. The emergence of national industrial relations systems has not been a matter of consensus but rather the result of an enduring struggle in which the labor movement faced in most countries not only the economic power of employers but also the repressive power of the state. Therefore, from its inception, industrial relations thought has dealt with the determination of the rules of employment but also with the relationship between the labor movement and the state. This helps explain why, at the turn of the century, the question of industrial relations was also a question of industrial democracy.

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<sup>1</sup> A version of this paper was presented at the 13th World Congress of the International Industrial Relations Association, « Beyond Traditional Employment. Industrial Relations in the Network Economy » September 8-12, 2003, Freie Universität Berlin, Germany. It was subsequently translated into Spanish and published in the journal *Relaciones Laborales* (Isabel da Costa, 2003). A longer version more focused on Europe has been published in Portuguese (Isabel da Costa, 2004).

## **1.1. Collective bargaining or state legislation?**

Sidney and Beatrice Webb were the forerunners of what was later to become industrial relations as a field of research. Beatrice Webb invented the term “collective bargaining”, as opposed to individual bargaining, and some of the concepts developed by the Webbs influenced industrial relations thought in the United Kingdom, on the European continent and in the United States. In their book “Industrial Democracy” (1897), the Webbs present the British trade unions’ practice of the “Device of the Common Rule” as contributing to economic efficiency and growth. They identify three doctrines that underlie union strategies: vested interests, supply and demand and living wage. They favor the latter, which entails legislation setting minimum standards for the regulation of working conditions, as they favor legislation over collective bargaining (p.803) especially for “Regulations” such as health and safety, hours of work and minimum wages and for the “weaker classes” (including women and children). Thus, for the Webbs, the regulations determining the conditions of employment should increasingly be determined by the state in the general interest of the citizens and the consumers, which would minimize the role of the unions in the future “industrial democracy”.

John Commons, who pioneered work on industrial relations in the United States, was inspired by the Webbs, especially their concept of the “common rule” but, contrary to the Webbs, Commons advocated the development and the autonomy of collective bargaining which constituted for him the basis of both industrial and political democracy. Commons elaborates his notion of the “constitutional government of industry” by analogy with the British Parliament. For him industrial democracy is collective bargaining between the representatives of two organized groups, the employers and the employees, which have conflicting economic interests. Commons derives his concept of the “rules of collective action” from the Webbs’ concept of the common rule, except that the rules of collective action are elaborated at the bottom by the actors and do not come from above from state intervention.

Thus, even though the concept of rules is at the center of the analysis in both cases, Commons puts forward the autonomy of collective bargaining where the Webbs advocated the legislative power of the state. We can find echoes of these two positions in current industrial relations debates between pluralists and neocorporatists.

The question of industrial democracy runs through the work of many scholars in industrial relations. There are different definitions of it and the debate, related as it was to the traditions of the national labor movements, took different forms in different countries, which influenced the status of collective bargaining and the institutional arrangements of the emerging national systems of industrial relations. Is a similar debate going to emerge with the extension of free trade to more regions around the world or is the issue of a different nature when no national borders are involved? Can transnational common rules contribute to economic growth? Should these rules stem from transnational collective bargaining between employers and workers organizations or rather from transnational legislation? European directives, international labor standards, clauses in free trade agreements such as those included in NAFTA and NAALC, or multinational enterprises codes of conduct are just a few of the current tentative ways to reach transnational common rules. What forms will industrial democracy or worker representation take in order to ensure labor protection in expanded commercial markets? A brief historical recall of some of the terms the debate in France and Germany might suggest some ideas.

## 1.2. Different institutional arrangements for worker representation

In France one of the questions debated by legal scholars was the “dualism” of the collective agreement, in the sense that it is both a private contract and a (semi-public) collective regulation of a trade, in particular when it takes place at the industry level. One of the issues was legal enforcement; another was whether an intermediate body between the state and the individual could be entitled to establish the rules of the employment relationship. The way this issue has been dealt with in France resulted in the enactment of several laws and a mechanism of state “extension” to a whole industry of the terms of collective agreements. One of the outcomes is the fact that, with a very low rate of unionization, France has one of the highest rates of workers covered by collective agreements in Europe. In France collective bargaining can take place at different levels (workplace, enterprise, industry, multi-industry, national) so that the role of industry (“branche”) bargaining as well as the articulation of the levels of bargaining are lively themes of research (Jobert, 2000).

In Germany, there was a step by step vision of industrial democracy called “economic democracy”. For the unions “economic democracy” had two aims: in the short term obtain an “equality of rights” for the workers in economic management; in the long term, economic democracy was a step towards a new economic order (socialism). For legal scholars the stage at the beginning of the century was “industrial constitutionalism”, which reduced employers’ power to impose rules by giving economic and social rights to the workers and their representatives. Hugo Sinzheimer, for example, contributed to establishing a democratic “economic order” in the Constitution of the Weimar Republic (Rehfeldt, 1990). Thus, in Germany, legislation gave workers new rights, among which those later called “codetermination” rights, which introduced procedural rules making workers’ consultation compulsory at the workplace level. Codetermination was first limited to working conditions but, after World War II, it was enlarged to encompass wider issues dealing with the economic and social management of the enterprises. The way in which these rights were to be administered also gives German workers a dual system of representation, through the works councils and through the unions (Rehfeldt, 1996).

The way in which different countries responded to the quest for industrial democracy influenced the characteristics of their national systems of industrial relations in terms of the mechanisms provided for worker representation, the status of collective bargaining and the role of the state in those systems. Ultimately industrial democracy entails the setting up of mechanisms for worker representation but these can take different forms according to the traditions of the labor movements, their relations to the national states as well as judicial and legislative traditions. As Otto Kahn-Freund points out, industrial democracy does not give workers the power to make the rules of their employment relation but rather the right to elect representatives who will participate in making them: *“In both spheres – the political and the industrial – democracy means that those who obey the rules have a right (and a moral duty) to elect those who represent them in making the rules.”* (p.12) The difference though between political and industrial democracy is that a citizen generally has the right to vote and be represented, but for a worker, that right is contingent on the existence of unions, on the mechanisms provided for representation in each industrial relations system, and even on what kind of rules governing the employment relation are recognized as being proper topics for bargaining with employers. At the transnational level these remain open questions. Mechanisms for worker representation and labor protection have not been a systematic concern in free trade agreements. The NAALC provides for some labor rights but the European Union is the free trade region with the most developed mechanisms for worker

representation and labor protection. The study of the European experience might then help us progress in the analysis of economic regionalization and industrial relations.

## **2. A NEW LEVEL OF REGULATION**

Industrial relations theories have emerged in given national contexts with long histories and specific traditions of national labor movements. Those histories have conditioned the ways in which industrial relations systems have emerged and the kind of institutional arrangements they contain. Europe, however, is a peculiar kind of federal state with many specific national histories of industrial relations to aggregate and a very short past history of its own. Should this new level of regulation of employment relations be considered as an emerging new system of industrial relations on its own right which could eventually change existing national industrial relations systems or as just a supplementary level to be added to what exists at the national levels? Can the European experience shed a new light on the North American one?

### **2.1. The emergence of a system of industrial relations**

The way in which John Dunlop (1958, 1993) analyzed national industrial relations systems in his book "Industrial Relations Systems" is interesting to recall here. According to Dunlop (p.227): *"The major characteristics of a national industrial-relations system appear to be established at a relatively early stage in the industrial development of a country. In the absence of a violent revolution in the larger community, a national industrial-relations system appears to retain these characteristics despite subsequent evolution."* This might leave one to wonder whether the advent of the EU is to be considered as a "violent revolution" or regarded as minor in the evolution of national industrial relations, but the point is that the moment of the emergence of a system seems to be crucial for the determination of its long-lasting characteristics and needs to be paid particular attention to.

At the historical moment of the formation of a system a crucial factor for Dunlop is the strategy of the elite leading the industrialization process and the nature of its relations to the labor movement. The decisions of the elites establishing an industrial relations system determine the characteristics of that system and the rules set during the industrialization process that will prevail. Dunlop's elite ideal types might have changed but his analysis calls for more research on the characteristics of industrial relations actors, their status and their power relations, at the historical moment of emergence of European or other regional types of regulation in industrial relations. If the notion of "elite" has a meaning at the European level it would certainly be worth while to explore it. Furthermore, at the European or other transnational levels even the traditional actors in classical industrial relations literature, *i.e.*, managers, workers (including their organizations), and the government, become complex and need to be better understood. Finally, the European and other regional levels seem also to entail new actors (Piore, 1996) that could act as pressure groups for specific regulations which open up new research perspectives about their collective actions and their possible alliances with traditional industrial relations actors.

The advent of the EU definitely means a change in the economic environment although it is difficult to forecast the impact that change will have on industrial relations systems. The question of an European or transnational level of industrial relations, however, brings up a

problem which has been difficult to deal with in industrial relations theory: will it constitute a system?

## 2.2. The theoretical problem of aggregation

Dunlop's notion of a system of industrial relations applies to the workshop as well as to the enterprise, industry or national levels. These systems may have different features which are not necessarily compatible. How can they all be aggregated into forming a national system? Dunlop is aware of the differences but just characterizes a national system by the predominance of some of its components: "*In general terms, the industrial relations systems of any aggregate will be shaped by the relative prevalence of different types of the component systems.*" (p.59)

Thus Dunlop fails to address the theoretical problem of aggregation as well as that of the articulation of different levels of industrial relations. When a national system is rather coherent or homogeneous or when it possesses a dominant model these problems may not come to the fore. But when one tries to apply the analysis to Europe or other regional levels, they become crucial. If one can aggregate the different industry level systems existing in a country so as to be able to identify such a thing as a "national" industrial relations system, then one should also be able to aggregate different national industrial relations systems and identify a "European" system of industrial relations. But can one identify a European system of industrial relations through the dominance or relative prevalence of one of its component systems? Should the dominant characteristics be those of the country with the largest population or the highest number of collective agreements for example? There have been a number of international comparisons in industrial relations which try to identify clusters of countries with given similar industrial relations characteristics. But the position of specific countries in the different typologies can often be contested and so far no consensus has emerged as to the contours of a dominant model of industrial relations in Europe.

The problem of aggregation is a major theoretical one for the study of industrial relations in Europe and especially for international comparisons. It is one though that, to my knowledge, remains yet unsolved. Other scholars have given different answers to that problem but they are not much more convincing than Dunlop's. Flanders (1970, p.85-6) for instance, is aware of the problem but rhetorically dismisses it: "*The answer is no different for industrial relations than for economics, or politics, or the law. There are national systems of each because the nation itself is an entity.*" (p.93) Since Europe is also an entity, could the same be said of a European system of industrial relations? What about NAFTA, does its labor side agreement contribute to the establishment of an industrial relations entity? Ultimately Flanders resorts to such notions as "common ideology" or "shared understandings", which are also used by Dunlop, to give substance or unity to the existence of a system of industrial relations at the national level, but are value judgements a necessity rather than a common legal framework or the administrative role of governments for example? How this is to be applied to the European or other regional levels is a further question for research. But whether or not industrial relations theory can solve the aggregation problem in a manner that would make it obvious to identify a European system of industrial relations, Europe as a level of industrial relations regulation remains a fact which poses another problem, that of the articulation of different levels of bargaining.

### 3. THE ARTICULATION OF DIFFERENT LEVELS OF BARGAINING

#### 3.1. The challenge from above and from below

Flanders' theory is interesting in this respect too, for his analysis of what is wrong with the British system of industrial relations also constitutes an attempt to articulate different levels of bargaining. Flanders thinks that the British system of industry agreements is being challenged both from above – by the necessity for national planning stemming in particular from the demands for wage and price stability – and from below – with the shop stewards demand for more industrial democracy and the development of workplace bargaining. Thus, for Flanders: *“Nothing less than a fully developed three-tier system of industrial relations promises to meet the challenges from above and from below. We need a top tier of central or truly national negotiations above industry level and another bottom tier below for supplementary and compatible workplace negotiations.”* (p.116) Flanders places the responsibility for changing the system with the government and management (p.128). Since the actors will adjust (one way or another) to the perceived demands of the system, the reform of the system entails for Flanders just two basic imperatives: *“The first is the need to find the possible terms of agreement among the interested parties at each level: national, industrial and workplace. Agreement cannot be imposed on them; it has to be bargained. The second requirement is a clarification of the appropriate functions of job regulation at these three levels.”* (p.127)

In the theory elaborated by Flanders agreement is the key to change in the system. He takes it for granted that it can be reached through bargaining. In a way, he presupposes a balance of the powers of the bargaining parties and minimizes possible conflicts of interest. That is why he brushes aside legislation as a means for reform and legislative measures to assist trade unions in increasing their membership and in securing recognition from employers as well as legal enforcement of collective agreements and compulsory works councils (p.127).

But at the transnational level what kind of labor coordination would be required in order to reach a balance of power? Which rules of the employment relationship are to be dealt with at the European or regional level as compared to the national levels? And how are the rules stemming from the three levels to be articulated? Should a hierarchy be set which would for example put national regulation at the top and leave workers control at the bottom? Can it be done without a legal framework? Can Flanders three-tier system of industrial relations be expanded to include a fourth European level of industrial relations? And if we were to expand the three or four tier system of industrial relations further to include a fifth level of globalization, would it change the analysis? Would it be conceivable to have industrial relations regulation at the international level? Without a territorial entity, and especially a common institutional framework for worker representation can there still be a system of industrial relations?

Flanders' treatment of bargaining at the national level, with tripartite agreements, announces later neocorporatist analyses, as his treatment of bargaining at the workplace level, insisting on the necessity of cooperation, announces recent human resources management studies. But his theoretical framework clearly raises as many questions as it answers.

### **3.2. Strategic choices**

Kochan, Katz and McKersie (1986) when analyzing the transformation of American industrial relations also enlarge the traditional sphere of industrial relations, which they identify as that of collective bargaining at the enterprise level, to include two extra tiers, but their vision of articulation is not one of agreement on different topics or rules at different levels but rather one of a hierarchy of the different levels.

According to Kochan, Katz and McKersie, collective bargaining was for a long time the predominant and most studied element in the sphere of industrial relations, but the process of collective bargaining is now being influenced by and forced to adopt to forces which operate both at a superior and an inferior level of its traditional structure. These forces are the strategic decisions of management, on the one hand, and the daily interactions in the workshops, on the other hand. The traditional field of collective bargaining is thus placed at the median level. It loses its character of privileged object of study in industrial relations for it can no longer, by itself, explain the current practices or the result of the interaction between the actors of the system of industrial relations. At the superior level, even though the authors take other actors into account, they chose to place management values and strategies at the center of their analysis because for them labor and government strategies have remained unchanged (p.12-13).

The coherence of their model of industrial relations doesn't come from the predominance of a component of the system but rather from the strategies of the actors and primarily those of management. Their perspective is dynamic and historical and the actors play a key part in the evolution of the structure of the system of industrial relations. Their three interdependent levels evade the problem of aggregation and can even explain apparent contradictions in the strategy of the managerial actor: the same enterprise may have a global strategy of union avoidance, be forced to negotiate by the institutional constraints at the median level of industrial relations, and introduce a worker participation policy at the workshop level.

Kochan, Katz and McKersie's theoretical reformulation of the system of industrial relations presents both advantages and shortcomings (da Costa, 1990). The predominant role of management strategic choices, in particular, is both an advantage, because it constitutes the axis that could give the system its coherence, and a shortcoming, because it induces Kochan, Katz and McKersie to neglect the role of the interplay between the different actors, at all the levels, in the determination of the final outcomes of the system. When trying to analyze strategies, if one refers to military or political strategies, it is easy to understand that the result of those strategies, their actual application or the actions that stem from them, can be different from what was intended. Industrial relations are no different in this respect. Management has marketing, production, human resource and other strategies, of course, but competitors, consumers, unions, workers, public representatives and even non governmental organizations also have their own strategies. It is not just the will of management but rather the interaction of these different strategies, which may or may not be compatible, that accounts for the final results. These results are in general, as in the battlefield or the political arena, seldom identical to early strategies and planning.

## CONCLUSION: ECONOMIC CHANGE AND INDUSTRIAL RELATIONS RULES

Industrial relations theory and literature generally tend to take the economic environment as a given, an external force that induces change in the system, whose rules are supposed to adjust to it. One of the consequences of this one sided causal relation between economic change and industrial relations rules is that industrial relations studies, particularly in the field of international comparisons, have put forward a “convergence” thesis (Kerr *et al.*, 1964) which has been criticized for its technological and/or economic determinism. Modern versions of that thesis are more subtle but still try to identify common trends although the empirical evidence is sometimes hard to muster given the persistent divergence of national industrial relations systems. Concerning the impact of “globalization” on industrial relations in Europe, for instance, several studies find no evidence of converging trends (Alber and Standing, 2000; da Costa, 1998; Traxler and Woitech, 2000). As Jacques Freyssinet (1993, p.12) points out: *“European construction is first the reunion of heterogeneous social spaces under a common market regulation. It is secondly the setting up of an additional institutional level which will be articulated to the already existent ones and will give itself specific rules and means of intervention. It is finally, the framework for the potential genesis of new actors through the reunion and/or recomposition of the existing actors... Experience as well as analysis lead to the rejection of the presupposed or explicit hypothesis of the makers of Europe, according to which economic unification would by itself be a factor of convergence of the social modes of organization. The pressure of common economic constraints is certainly brought to bear upon the different national systems of industrial relations but their reactions show above all the amplitude of heterogeneity.”*

If the empirical evidence, particularly that examining Europe, most often identifies diverging patterns of adaptation, why do so many researchers still focus their analyses on possible convergences presumably induced by global market changes? Furthermore, why presume that there should be a universal “one best way” type of adaptation applicable to all sorts of production sites, industrial sectors, regions and countries? Technological advances, economic niches, sheltered public sectors – to mention just a few elements of economic diversity – all co-exist in market economies. Why shouldn't we then consider the existence of different ways to adapt to change and different regulations of employment relations at different industrial relations levels as a pragmatic and even useful resource for continuing transformation?

Maybe the answers have less to do with scientific analysis than with politics, and particularly the blind acceptance of the neo-liberal creed that would have us believe that there is no alternative to the economic dictates of the market, which is in fact an ideological justification for social and labor policies that could (and should) otherwise be questioned and democratically discussed in the political and social arenas.

A less deterministic and more dynamic interaction between the economic and the industrial relations systems would thus be a major question to be further explored in industrial relations theory if it is to be able to integrate Europe as a new level of regulation and the question of labor standards in the context of economic regionalization in general. However, a more dynamic interaction between the economic and the industrial relations systems should include the possibility for the industrial relations system to influence the economic system. If despite common economic pressures, particularly those brought about by European economic

integration, national responses vary and industrial relations diversities persist, future research should investigate the contribution those diverse industrial relations systems can make to market outcomes, especially those having to do with the evolution of employment in the labor markets. Furthermore, the consequences of different types of interactions between industrial relations, social protection systems and social policies on the regulation of employment relations at different levels – workplace, enterprise, industry, national, regional and global – would need to be better understood both empirically and theoretically.

Last but not least, a growing number of international comparisons stress the role of institutions (Van Ruysseveldt and Visser, 1996; da Costa, 1999). Industrial relations theory then also needs to elaborate new concepts to deal with institutional building and evolution. This is particularly important when considering the different mechanisms for worker representation, which call attention to the relationships between the labor movement and the state and legislation at particular historical periods of institutional building and evoke the issue of economic and industrial democracy.

At the European level this opens up for example the question of what form(s) workers representation should take at different levels and in different institutions; it calls for more research on the relations between collective bargaining and the law at the European level; it outlines issues such as the articulation of the levels of collective bargaining; and it should also bring to the fore a reflection on the content of the rules of the employment relationship which are to be dealt with at the European level and at the national or sector levels. At the international level the same questions should be raised and, furthermore, it is important to analyze the establishment of global labor standards; the role of the institutions in charge of implementing them and the interactions of the social partners that act at that level.

Such a research agenda would help industrial relations thought to build new theoretical models and elaborate democratic ideas and policies which could contribute to the development of labor standards and social regulation in the context of market integration and economic regionalization<sup>2</sup>.

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<sup>2</sup> My own current research project deals with the impact on labor of NAFTA and with union attitudes towards NAFTA in the USA, Canada and Mexico. It entails on the one hand, an analysis of the institutional mechanisms provided in the NAFTA agreement and particularly those dealing with labor and contained in the NAALC (North American Agreement on Labor Cooperation) and, on the other hand, field work in North America about union attitudes towards NAFTA. Finally, my objective is to do a comparison between NAFTA and another form of regional integration, i.e. the European Union. The impact of regional integration on industrial relations is not the same nor are union attitudes towards regional integration and the research will try to explore why.

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