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Network Governance in International Organizations:
The Case of Global Codes of Conduct

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**Introduction**

It is widely recognised that the worldwide shift from government to governance (Peters and Pierre, 2000, 1998; Rhodes 1997, 1996) has changed the way in which state authorities exert sovereign control. The shift to governance refers to a fundamentally non-hierarchical mode of coordination, one in which the task of regulation is not performed in classic command-and-control fashion by public actors democratically authorized by their national constituencies to take decisions that are binding for everybody, but is instead exercised consensually and jointly by public and private actors: non-state actors, both corporate and non-profit organizations (or even private citizens directly), not only participate in the implementation of public policy, but often also in their formulation (Mayntz 2006, 2003).

One of the most controversial consequences of the shift from government to governance is that “regulatory functions that are ultimately in the public interest” (Mayntz, 2003, p.4) are increasingly being devolved to the self-regulation of private organizations. Classic examples can be found in the fields of environmental and labour standards (Bartley, 2007, 2005; Cashore et al., 2007; Prakash and Potoski, 2007; Stafford, 2007), where matters that used to be, and still largely are, under the regulatory compass of the national state have become subject to complex private administrative systems (Radaelli, 2003; Porter and Ronit, 2007). The standard governance model in the corporate field is one in which a company, generally multinational, voluntarily promulgates a code of conduct. With this act, it publicly pledges to abide by general principles (inscribed in domestic and international law) in its activities, both within its own organizational boundaries and, more importantly, in its dealings with commercial partners. Implementation of the codes of conduct (Sikkink, 1986; Sobczak, 2006; Terlaak, 2007) along the supply chain is then monitored by internal compliance departments, often in collaboration with NGOs and civil society organizations (Haufler, 2001).
This trend towards self-regulation is generally not just tolerated but actively supported by companies. Under pressure from NGOs and consumers (O'Rourke, 2005, 2003), these often see codes and the associated monitoring infrastructure as a way to insure themselves against social risks (King and Lenox, 2000) as well as a tool to preserve, improve, or rebuild their corporate image (Bernstein, 2001). From the point of view of firms, private monitoring systems are more flexible and less intrusive than traditional government regulation (Cashore, 2002). They can often be integrated within existing corporate structures for the governance of global supply chains (e.g. for quality control). Governments, too, generally value the flexibility and responsiveness of these corporate systems (Ayres and Braithwaite, 1992), as they promise to increase companies’ compliance with standards without overloading thin departmental budgets and governmental staff.

In this paper we do not discuss whether or not global codes of conduct and the associated private monitoring infrastructure weaken or not the national state. We draw attention to the fact that they may be fundamentally changing the nature and function of international organizations, and the role that the latter exert in regulating the business environment.

According to the traditional command-and-control paradigm, international organizations are attenuated mirror images of national states, from whose agreement they emergence. The regulatory acts of international organizations prescribe or prohibit certain kinds of behaviours, leaving prevention and repression of non-compliance to the regulatory apparatuses of ratifying member states. In this traditional model, implementation of the rules is the prerogative of public bureaucracies at the national model. Differently from this traditional model, voluntary codes affirm general principles, whose respect is recognized as desirable and encouraged, at various titles, by signatory parties. Voluntary codes say very little specific as to how general goals (respect of fundamental principles) are to be achieved (Utting and Zammit, 2006; Utting, 2005). Also, they do not include penalties. Rather, they rely heavily on civil society to alert the public about the importance of the principles in questions, to circulate information about violations and to participate in remediation.
The shift to voluntary codes of conduct is not new, particularly for international organizations. For example in the field of corporate self-regulation the first initiatives, the Organization for Economic Cooperation and Development’s Guidelines for Multinational Enterprises and the International Labour Organizations’ Tripartite Declaration of Principles Concerning Multinational Enterprises, date back to 1976 and 1977, respectively. Both initiatives were regarded as being ahead of their time when they were adopted. They represented a textbook example of ‘governance without government’ (Rosenau and Czempiel, 1992; Peters and Pierre, 2000, 1998), because they limited their intervention to a set of core principles and guidelines, and relied heavily on private action (voluntary compliance).

Only recently have international organizations started to move their codes of conduct beyond declarations of principles, by establishing multi-stakeholders initiatives including but not limited to businesses, representatives of national governments and NGOs. These initiatives are “multiorganizational arrangements for solving problems that cannot be achieved, or achieved easily, by single organizations” (Agranoff and McGuire, 2001, p.296). They are ultimately contributing to achieve a public interest and they are managed by representatives of the international organizations.

In stylized form, the new global governance model operates as follows: it begins with a declaration of general principles, endorsed and actively promoted by an international organization, and devolves responsibility for the more precise definition of the principles, as well as of the means to achieve them, to local actors (private and public) which are supposed to have intimate knowledge of specific regulatory problems as well as some insights on to how such problems should be addressed. For international organizations it is key to systematically produce information about the performance of local actors, often through the creation and publication of indicators that track their progress.

All of this achieves two goals: it puts corporate behaviour under the spotlight of international NGOs and of consumer movements (O’Rourke, 2005, 2003), and forces them to constantly benchmark against their own past performance and their competitors’ (Jesover and Kirkpatrick,
International organizations play an important role in circulating information about best practices and in facilitating organizational learning (Kell and Levin, 2002; Ruggie, 2002).

Companies often welcome the more direct involvement of international organizations in private monitoring activities (Béthoux, Didry and Mias, 2007) for various reasons: it contributes to bring order to the unruly world of corporate codes of conducts, where suppliers in global supply chains are being monitored repeatedly by different corporate agents, each checking their compliance with different codes, with a clear multiplication of costs. Also, the involvement of international organization increases the credibility and legitimacy of monitoring activities, and contributes to solve the vexed problem of credibly monitoring the monitors (O’Rourke, 2005, 2003).

We do not mean to argue that international organizations are all unambiguously evolving in the direction of networked governance. Specialised Agencies and UN Funds and Programmes, such as UNEP or ILO, are very much thorn between their old standard-setting role, and the new one. On the one hand, these organizations still largely perceive their mission as one of building international consensus over minimal regulatory requirements, to be ratified and implemented by national governments through hard law. On the other hand, several of their projects on the ground move clearly in the direction illustrated above, and many organizations increasingly act as coordinators of global networks that include governments, companies, and non-profit actors at various levels, each involved in private monitoring and remediation activities.

The paper investigates the development of this new form of global networks governance by analysing the evolution of two cases: the New OECD Guidelines for Multinational Enterprises (2000) and the United Nations Global Compact (1999). The cases were selected for analysis due to the scope of their potential impacts, both in terms of geographical reach and in terms of issue coverage1.

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1 Initiatives such as the EMAS, the eco-management and audit scheme of the EU, or the ILO Guidelines on Occupational Safety and Health Management Systems have a more limited scope, in terms of geographical reach or of policy domain.
While the ultimate goal of these two initiatives is to achieve greater social responsibility by corporate actors (Cetindamar and Husoy, 2007), the intermediate step is to set enabling structures and procedures for achieving this goal. The two initiatives rely on what can be considered as public networks. The OECD is an inter-governmental organization where decisions are taken by consensus. It can be also defined as an international standard setting organization for public policy (Gordon, 2008). The United Nations are considered the “linchpin of the multilateral system and the global institution that approximates most closely to an embryonic form of global governance, [to] the guardian of the global public good” (Zammit, 2003, p.8)

The remainder of the paper provides a processual account of the evolution of the two networks in 1999-2007 (Pettigrew, 1990) from a public network management perspective (Agranoff and McGuire, 2001, 1998; Bardach, 1998; Bogason and Toonen, 1998; Eglene, Dawes and Schneider, 2007; Herranz, 2007; Kickert, Klijn and Koppenjam, 1997; O’Toole, 1997). It does so by dealing with the following questions:

— How have these networks been activated?
— How has the interaction among stakeholders shaped issue framing and the network re-adaptation?
— How do learning processes develop within the local and the global networks?
— How does the interplay between the governance structure of each initiative and the follow-up mechanisms determine the form of business accountability?

These questions are addressed through a narrative analysis. Our main goal is to assess the extent to which the framework elaborated by Agranoff and McGuire (2001) primarily for national networks adequately captures development in the international organization sphere. The paper provides a condensed narrative history of the 2000-2007 period for the OECD Guidelines and of the 1999-2007 period for the UN Global Compact Principles. The narrative covers the activation and the development phase of the networks, in their various evolutions. Indeed, both programmes have

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2 Interview by the authors with Kathryn Gordon, Senior Economist, OECD Investment Division, 4th April 2008.
gone through a lot of revisions and calibrations. Particularly, these initiatives have been reframed in terms of greater corporate accountability. Also, the organizational locus and the mechanisms for participation of different stakeholders have been rearranged, and the level of commitment required from corporations has been increased.

The empirical analysis of the two cases draws on UN and OECD public as well as internal documents (2005-2007) as well as on field research (2007-2008). Access to interviews and to the documents has been facilitated by the direct work experience of one author at the ILO and by the participation in the Global Compact Academic Network of the other author. Attending the Global Leaders Summit in Geneva (5-6 July 2007), the UNRISD Conference on ‘Business, Social Policy and Corporate Political Influence in Developing Countries’ in Geneva (12-13 November 2007) and the Italian Global Compact Local Network annual meeting (Rome, 3 December 2007) provided us with further insights on the dynamics internal to the networks and with further contacts for the interviews.

The OECD Guidelines for Multinational Corporations (2000-2008)

Network activation

The OECD guidelines were launched in 1976 as part of a broader project: the OECD Declaration on International Investment and Multinational Enterprises, promoting a comprehensive approach for government treatment of foreign direct investment and for corporate activities in adhering countries. The general policy commitment of the Declaration was to improve the investment climate, encourage the positive contribution of multinational enterprises to economic and social progress and minimise and resolve difficulties which could arise from their operations.

The first Guidelines were rooted in the socio-political milieu of the first half of the 1970s, with policy elites debating the role of Multinational Corporations, and discussing various ways to limit the MNCs’ influence on national developments. The debate reached its apex in 1973, when protesters bombed the ITT Inc headquarters in New York, alleging that the company had been
directly implicated in the overthrow of the democratically elected (socialist) government in Chile.³ “The OECD Guidelines came out of this era with the precise need to give directives to the multinational corporations operating in developing countries. This is why they were labelled *global social contract*” (Gordon, 2008).⁴ The previous years had witnessed a flurry of activities in the UN system, especially the establishment of the UN Centre for Transnational Corporations, which aimed at the development of comprehensive codes of conduct for multinational corporations. However the political and ideological diversity across members states undermined these endeavours, resulting in “abortive attempts” (Stopford, 2005, p.110), and “the failure of the UN to provide such guidelines resulted in a gap-filling opportunity for the OECD” (MacKay, 2008)⁵. Thus, in 1976 the 24 OECD members states agreed on a basic commitment to a market economy and to a set of guidelines which were understood from the beginning to be of voluntary nature (Campbell and Rowan, 1983). More specifically, the Guidelines for Multinational Enterprises were launched as recommendations addressed by governments to multinational enterprises. They were conceived as voluntary principles and standards for responsible business conduct consistent with applicable law (Blanpain, 1979, 1983).

In 2000 the OECD embarked in a revised version of the Guidelines, which was adopted by the governments of the 30 Member countries. Since then, ten non Member-countries, including Argentina, Brazil, Chile, Israel and Egypt, have also adhered.

**Network re-adaptation and issue framing**

The revised Guidelines were the result of a consultation process between November 1998 and June 2000 aimed at reaching a comprehensive Multilateral Agreement on Investment (MAI), which would ensure ample protection for foreign direct investment in recipient countries. The MAI

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³ Declassified documents released by the CIA in 2000 suggested that ITT financially helped opponents of Salvador Allende's government prepare a military coup. See also Sobel, 1982.

⁴ Interview by the authors with Kathryn Gordon, OECD Senior Economist of the Investment Committee 4th April 2008.

⁵ Interview by the authors with Vernon McKay, Canada’s National Contact Point of the OECD Guidelines for Multinational Enterprises, in charge of coordinating the OECD National Contact Points Working Group 3rd April 2008.
never saw the light of day, but led to a revision of existing guidelines. The process involved formally the Business & Industry Advisory Committee (BIAC), representing the interests of companies and business organizations, and the Trade Unions Advisory Committee (TUAC), including ILO and the international labour community. While the role of the NGOs was more limited than that of labour and business, because they were no formal consultative body for them (Slob, 2008), the level of engagement and the importance of the NGOs was practically the same of the Business and Labour Committees” (MacKay, 2008). The revised version of the guidelines expanded its scope to include child and forced labour, workforce conditions and internal environmental management, human rights, and the fight against corruption through greater disclosure and transparency. Another adjustment of the 2000 Guidelines was a wider definition of the targeted corporations. While the 1976 Guidelines were explicitly focused on Transnational Corporations, the revised Guidelines were adapted to reflect also the specificities of Small and Medium Enterprises.

The reach of the Guidelines was extended not only by adding new chapters and by widening the audience, but also by introducing a follow-up system. This result was achieved both by accentuating the network-based organizational structure of the programme, and by establishing a grievance resolution channel (known as “Specific Instances Procedure”). On the one hand, the network structure of the OECD Guidelines is now centred on the OECD Investment Committee, located in the Paris OECD headquarters, and on National Contact Points (NCPs), which every adhering country must set up. A coalition of more than seventies NGOs from all the continents, with a mission to monitor corporate conduct with respect to the Guidelines – the OECD Watch – has become an essential stakeholder of the Guidelines.

On the other hand, a complaint procedure has been defined by the OECD, after a negotiation among the adhering countries, for dealing with companies that are believed to be in breach of the

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6 The consultation has progressed through a series of approximately ten multi-stakeholder meetings, each focusing on two-three chapters.

7 Interview by the authors with Bart Slob, senior researcher at SOMO, member of the OECD Watch and , 16th and 17th March 2008.
Guidelines. Such *Specific Instances Procedure* can be accessed by trade unions, NGOs or even other interested parties and have to be directed at the National Contact Point. Trade Unions have been the first to fill a complaint in 2001, when the Brazil National Confederation of Trade Unions (Central Unica dos Trabalhadores – CUT) lodged a complaint against the relocation of Parmalat-Brazil from a region to another without prior notice (Slob, 2008). Over time NGOs have joined Trade Unions in filing complaints against corporations. Indeed, OECD Watch has become the main source of complaints which are addressed to the National Contact Points.

**Network learning processes**

The OECD Guidelines network has two main loci for learning. One is represented by the central level, and particularly by the meetings of the Investment Committee, which is assisted by a working party. At the global level, the Investment Committee involves stakeholders in a way that is “programmatic, substantial and instrumental for the guidelines” (Schekulin, 2008). It organizes debate on matters covered by the Guidelines, including the advisory bodies which, in turn, involve their stakeholders in the promotion of the Guidelines. For example the Business & Industry Advisory Committee (BIAC) has been active in promoting the guidelines with their constituents, and the Trade Unions Advisory Committee (TUAC) has established training programmes for unions at the international level.

But the most relevant learning platform is provided by four annual meetings (McKay, 2008) for the forty adhering countries. One of these meetings is the annual convention of the National Contact Points. The role of the Investment Committee is to help the local level to act in a coherent way, by ensuring a benchmarking system while respecting local specificities. In other words, National Contact Points have to ensure ‘functional equivalence’ and are free to determine their strategy and organizational structure as long as they fulfil the functions set up in the Guidelines.

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8 Interview by the authors with Manfred Schekulin, Chair of the OECD Investment Committee and Director of the Export & Investment Policy at the Austrian Federal Ministry of Economics and Labour
(Schekulin, 2008). Yet, all National Contact Points must report their activities in a standardised format and are subject to peer-review. The reports contain information about specific instances handled by the National Contact Points. During the annual meeting, experiences are shared and issues are raised. While some NGOs observers have argued that the process is still “far too diplomatic to be punchy” (Slob, 2008), there is consensus that a process of learning and disclosure has taken place among the National Contact Points since 2000 (Schekulin, 2008; MacKay, 2008).

Another task of the Investment Committee which facilitates collective learning is the clarification procedure. Since the Guidelines have been drafted in general terms, in order to apply to countries with different legal frameworks and practices, the Investment Committee is required to provide additional information about whether and how the Guidelines apply to a particular situation. While clarifications may arise in connection with the activities of a specific enterprise, they are not intended to assess the conduct of single corporations but rather to set a standardised interpretation of the Specific Instances.

An instance of the clarification procedure at work is the request of OECD Watch to clarify the depth of the investment nexus and the extent of supply chain responsibility for multinational companies. The fact that the Guidelines did not provide an unambiguous definition of international investment led to discretionary interpretation on whether relationship in the supply chain constitute pure trade outside the scope of the Guidelines or, rather, they should be assessed on a case by case basis (OECD Watch, 2007). It should be said, however, that when in 2004 OECD Watch requested to clarify the investment nexus, this resulted in a narrow interpretation by the Investment Committee (Slob, 2008).

A significant contribution to the benchmarking and bench-learning process of the National Contact Points has been given by the OECD Watch. With support from the European Commission, OECD Watch undertook a survey to identify good practices of what could be considered a Model National Contact Point. The ‘model’ has largely emerged from experiences in Western Europe,

9 Ibid.
where the greatest number of cases have been filed. The study has confirmed that, while there is no one-size-fits-all model, an interdepartmental, or tripartite, or independent National Contact Point should be established. In the long term, such body should become an expert quasi-legal panel with sufficient autonomy to reach decisions and make recommendations. One critical aspect that has emerged from the analysis is that National Contact Points have “two essentially incompatible roles: they have to promote the interests of national companies while acting as impartial assessors of company behaviour” (OECD Watch, 2007, p.8).

The other locus of learning is represented by the each National Contact Point, in charge of promoting the Guidelines among enterprises operating in or from their territories. Institutional learning at the local level is intertwined with the follow-up process of the Guidelines. When a National Contact Point receives a case, it is responsible for trying to resolve the issue, through a range of available options that include offering a platform for discussion for the parties concerned, enable conciliation, or mediation. It can also seek advice from relevant authorities, such as business associations or unions or the OECD Investment Committee.

As a first step the National Contact Point assesses whether or not the case deserves further examination. As a further step, it moves to mediation. If no agreement is reached, a public statement on the case is published. Thereby, even if “the Guidelines do not provide for sanctions against corporations, the mere fact that the conclusions of the National Contact Points should be in the public domain can have an impact on the company behaviour” (Pinoargote, 2008). This threat activates a response by companies driven by the need for reputation maintenance.

Learning is influenced by the organizational structure and by the composition of the National Contact Points. Some of them are constituted only by civil servants. In other cases unions, business associations and NGOs also play an active role at the local level.

It is important to highlight that the network of NGOs grouped in the OECD Watch has learned to use the specific instance procedure as a strategy to activate some National Contact Points. In other words, due to the different levels of resources devoted to implementing the OECD
guidelines by the adhering countries, some National Contact Points are de facto activated and start to operate only when a complaint against a corporation – the so called *Specific Instances Procedure* – is filed. Therefore, during the initial phase of the revised Guidelines, between 2001 and 2002, the NGOs within OECD Watch have sent at least one or two complaints per adhering country in order to activate the National Contact Point (Slob, 2008). The number of complaints received is often considered a stimulus to strengthen the skills and the ability of a National Contact Point, as showed by the high record of complaints of the most active National Contact Points, such as Sweden, Chile or The Netherlands. In the latter, the National Contact Point has even been granted an ad hoc budget for ‘fact-finding’ on corporate practices.

However, the same NGOs strategy has not been successful in countries with no budget for implementing the activities related to the OECD Guidelines and with low political commitment. In these contexts the lodging of complaints by the NGOs has had no impact on the National Contact Point. Illustrative of this phenomenon is the case of Brazil, where no one of the five complaints issued by NGOs had been processed and completed (Slob, 2008).

**Network governance and follow-up mechanisms**

The OECD Guidelines are not an alternative to national laws and regulations, to which multinational enterprises are fully subject. They represent complementary principles and standards of non-legal nature. “While they extend beyond the law in many cases, they are not intended to place an enterprise in a situation where it faces conflicting requirements”\(^\text{10}\)

It should be emphasized however that the stakeholders increasingly consider it as a quasi-legal procedure and very often enter the *Special Instances* procedure in parallel with the legal process. Businesses tend to rely on their lawyers for the mediation, and for NGOs the whole procedure of fact finding and complaint has become so time-consuming and costly that once completed, it is then used to launch a parallel legal case within the competent national courts. In the

\(^{10}\) International Instruments and Corporate Social Responsibility. Report by the Sustainable Development through the Global Compact Project. 2007, p. 25.
words of one of the informants: “We are talking about three years reading thousands of documents. The amount of resources required is making some NGOs reluctant to file a complaint” (Slob, 2008). In other words, the procedure is becoming increasingly formalized, if not *de jure* certainly *de facto*.

A distinctive feature of the Guidelines is that they are binding for Governments, which have a key role to play in promoting, monitoring and enforcing responsible corporate behaviour, by virtue of their adherence to the OECD Declaration on International Investment. However, while only required to participate voluntarily, companies have unofficially adhered to the Guidelines through their support of the Business & Investment Advisory Committee. Occasionally some companies have signed the Guidelines, though this tool is not intended to be endorsed by corporations. “A company is not expected to endorse the Guidelines. A company is covered by these principles” (Gordon, 2008). Thus, the Guidelines are deemed to be the most accurate expression of the expectations of adhering governments (Schekulin, 2008) and through this tool managers can be instructed easily and promptly on the standards of responsible business conduct of all OECD member countries and adhering states (MacKay, 2008).

The purpose of the Guidelines is only to facilitate the resolution of problems through mediation and conciliation. However, while the recommendations to corporations are not binding, the *Special Instances* procedure can be activated irrespectively of the company acknowledgement of the Guidelines, thus ensuring that they do not become a public relation gimmick.

We now turn to another instrument for regulating corporate conduct, the UN Global Compact. As with the OECD Guidelines, we examine the experience of the Global Compact through the same analytical categories of activation, re-adaptation & reframing, learning processes and, last, governance & accountability.
The UN Global Compact (1999-2008)

Network activation

The launching of the UN Global Compact originated from the increasing interactions between the United Nations and the business world since the early nineties (Tesner, 2000; Zammit, 2003). The range of UN-Business partnerships included a multiplicity of initiatives, ranging from operational delivery partnerships to country-level cooperation, from partnerships to address global health issues to fundraising initiatives. A significant stream of interaction resulted from the increasing participation of corporate representatives to global conferences, resulting in the inclusion of the private sector in major events which have shaped the UN Agenda.

UN-Business collaboration has been a priority of the Secretary General Kofi Annan since the inception of his mandate in 1997. The underlying assumptions were that a “rapprochement with the private sector” was needed (Zammit, 2003, p.30), that the UN and the private sector could be mutually supportive (Mezzalama and Ouedraogo, 1999) and that “confrontation had taken a back seat to co-operation (and) polemics had given way to partnerships” (United Nations, 1999).

“With dozens – perhaps hundreds – of joint business-UN activities already under way in nearly every UN agency, the Secretary General pressed for a new high-profile program that would symbolize the new UN-business partnership. The idea for a “Global Compact” emerged from conversations with business executives in 1997 and 1998, especially with the International Chamber of Commerce.” (Paine, 2000, p.9)

Thus, after months of preliminary negotiations, at the 1999 Davos Economic Forum the Secretary General launched the idea of the Global Compact, and, in an address to business leaders, invited to join an international initiative that would bring companies together with UN agencies, labour and civil society to support universal social and environmental principles (ILO, 2007, p.18).

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12 Illustrative of this inclusion are the 1992 United Nations Conference on Environment and Development (UNCED) and the 1995 World Summit on Social Development.

13 Quoted in Zammit, 2003 p. 31
The reaction to the speech was encouraging and the Office for the Secretary General decided to convene the three UN Agencies in charge of Labour Issues, Human Rights and Environment.\textsuperscript{14} The explicit goal was the definition of an initiative aimed at involving corporations in the promotion of universal principles and values, consistent with the major declarations and conventions previously adopted by the UN.

There are at least two complementary explanations behind the UN decision to launch a global partnership with the private sector. On the one hand the complexity and interdependency of the current challenges that societies are facing worldwide seemed to call for multi-stakeholder solutions. Those initiatives are not based on traditional hierarchical ways of governing but rather on the involvement of external players in policy-making and policy definition (Peters and Pierre, 2000; Rhodes 1996; Mayntz, 2003, 2006). The UN and the member states were embracing the same approach (Utting, 2000; Ruggie, 2001; Ricther, 2002) with the concurring Millennium Declaration, based on eight interconnected principles as well as with General Assembly’s resolution on global partnership (United Nations, 2001). In this perspective, the Global Compact can be considered a strategic repositioning of the UN as an organization able to provide solutions to the intricate problems of globalization (Kell and Levin, 2002).

On the other hand, corporate partnerships were seen as a promising new way to attract political and financial support for the UN, after more than a decade of heavy criticism from important sectors of business, conservative foundations and think-tanks, particularly in the US (Paine, 2000).

“The UN bid in the latter part of the 1990s to encourage the business community can also be seen as part of a strategy to diminish the anti-UN sentiments of an influential part of the US political and business community” (Zammit, 2003, p.43)

In July 2000 the operational phase of the Global Compact was initiated. The Compact was conceived and organised as a Network involving companies, governments, unions,

\textsuperscript{14} International Labour Organization, Office for the High Commissioner on Human Rights and the United Nations Environmental Programme.
business associations, NGOs, the academia and the UN Global Compact Office backed by six specialised agencies.

Network re-adaptation and issue framing

The discussion on the role and the features of the Global Compact internal to the UN was framed in the broader debate about the inclusion of external actors, both corporate and non profit, in the UN activities. Thereby, the General Assembly in November 2001 resolved that the Global Compact “would operate as a network and not be considered a formal UN institution structure requiring intergovernmental oversight” (Zammit, 2003, p.49). Ever since the announcement of the Compact at the World Economic Forum in Davos, NGOs had reacted dynamically to the new initiatives. A group of renowned NGOs, the so-called Compact-NGOs had decided to join the Compact in order to contribute to its effectiveness in dealing with complex development issues and social problems. Another stream of the NGOs, instead, had been harshly critical of the Compact since its inception. The most frequent charges to the Compact included the fact that it ‘lacked teeth’ and that it was a ‘blue-washing’ mechanism that would allow corporation to “promote a socially responsible image through their association with the UN” (Utting, 2006, p.8). The criticism of NGOs has accompanied the evolution of the Global Compact and has contributed to shape its vision and operation.

Illustrative of the first wave of anti-Compact mood among NGOs and activist groups is the contrast of two concurrent initiatives. The first, Citizen Compact, was launched in 2000 at the World Economic Summit in 2000. The petition proposed a compact between the UN and civil society. The second initiative, Alliance for a Corporate Free UN, was launched in 2000 as an international coalition of organizations claiming that human rights and environmental records of companies forming partnerships with the UN were flawed. The Alliance called on the UN to “forgo such collaborations and play the more appropriate role of counterbalancing corporate-led globalization” (CorpWatch, 2000).
During the first two years of the Compact, an invitation was extended to businesses to apply for membership. As a minimum requirement, corporations were asked to send once a year some examples of good practices in one or more of the Principles. The business world responded promptly, and more than 1,000 companies signed in. However, at that point the Global Compact Office did not avail itself of monitoring or evaluation tools.

Partly in response to the NGOs’ critiques, partly as a preparatory step toward the Global Compact review, in January 2003 the membership approach was replaced by the participation approach. The new approach did not require initial screening but, instead, devolved the responsibility for admission to the local structures (Zammit, 2003). In other words, the Global Compact reframed partnership using the looser concept of an extensive worldwide network of stakeholders – working collaboratively at the global and local level” (UN, 2003). At the same time, a new system of annual progress communication was put in place. The procedure solicits adhering corporations to communicate on an annual basis their progress in implementing the Global Compact Principles to the stakeholders, through mainstream channels such as financial reports, CSR reports, or the websites.

A second wave of NGOs criticism to the Global Compact came mainly from the group of the Compact NGOs, such as Amnesty International, Human Rights Watch and Oxfam. These adhering organizations exerted a pressure from within, by making public their concerns that the Global Compact lacked any accountability mechanism in 2003. Their example was followed by other organizations, such as Human Rights First, in 2004.

To reassert the authority and credibility of the network, in June 2004 the Global Compact adopted a set of three Integrity Measures. Since then, the use of the Global Compact’s name and logo is limited to certain authorized instances only. Second, the list of inactive or non-communicating companies is disclosed. Third, transparent means to handle credible allegations of systematic or egregious abuse of the GC’s overall aims and principles are introduced.

15 Quoted in Zammit, 2003, p.80.
Together with the integrity measures, a comprehensive governance review of the Compact was conducted in 2004-2005. This ensured a more prominent role to the local networks and their annual meetings. The Secretary General decided also to elevate the status of the meeting by making it a formal component of the Global Compact initiative.

Local Networks are now defined as “clusters of participants who come together to advance the Global Compact and its principles at the local level” (UN Global Compact, 2007, p.8). They perform increasingly important roles in rooting the Global Compact within different national and cultural contexts, and also in helping to manage the organizational consequences of the Compact’s rapid expansion. The growth of Local Networks has in many ways kept up with the pace and nature of the initiative’s overall growth, particularly in recent years. Between 2006 and 2008 for example the number of Networks has doubled and the number of fully established Networks has reached 65, with an additional 20 in development (Petersen, 2008). This is a vast increase from 2001 when there were just four GCLNs (UN Global Compact, 2007, p.15).

The Governance review of the Global Compact strengthened also the involvement of civil society organizations that have an understanding of the ten principles and related expertise – particularly in terms of helping companies translate the principles into policies and practice. This is a consequence both of the Global Compact Office attempts to address the criticisms of some NGOs, as well as an organizational drift towards multi-stakeholders initiatives within the UN system (Makinwa, 2008).

Illustrative of civil society involvement is the appointment of a Civil Society Coordinator within the Global Compact Office. Also, NGOs are included, together with businesses, unions and UN representatives, in the UN Global Compact Board. Selected and chaired by the United Nations

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16 Notable is the fact that the Americas, Asia and Africa each have approximately 15 GCLNs (including emerging GCLNs) per region, though the regions differ significantly in terms of total number of engaged stakeholders. For example, on average 140 organizations are engaged in each GCLN in the Americas, compared to 40 in Asia and less than 20 in Africa. (UN Global Compact, 2007, p.15)

17 Interview by the authors with Soren Mandrup Petersen, UN Global Compact Office representative. Head of Partnerships and responsible of the Local Networks. 20th May 2008

18 Interview by the authors with Olajobi Makinwa, UN Global Compact Office representative. Civil Society Coordinator. 20th May 2008
Secretary-General, this group is designed as a multi-stakeholder body, providing ongoing strategic and policy advice for the programme as a whole and making recommendations to the Global Compact Office, participants and other stakeholders. Last, civil society organizations can be included in Local Networks.19

Network learning processes

“Learning network” and “learning platform” are two terms often used to describe the mission and the tasks of the Global Compact (Ruggie, 2001; Kell and Levin, 2002; Zammit, 2003). The very Global Compact Framework states that the primary goals of engagement are practical learning and dialogue (United Nations, 2005). The learning processes and venues are modelled on the multi-centric governance system of the Global Compact and, as a result, are fairly scattered. Governance and learning functions are in fact shared by six entities with differentiated tasks: the Global Compact Office, the triennial Leaders Summit, the Board, the Local Networks, the annual Local Networks Forum and the Inter-Agency Team.

At the central level the Global Compact Office and the Inter-agency Team organise working groups on specific sectors and issues. The working groups are expected to “assist participants to implement principles” (Makinwa, 2008) by addressing the challenges and problems faced by UN Global Compact stakeholders. Examples are the Global Compact’s financial initiative *Who Cares Wins*, the extractive industry initiative on the topic of business in conflict zones, or the working group focusing on the corruption principle.

Still at the central level, the above-mentioned Global Compact Board is a twenty-member entity expected to make recommendations to the Global Compact Office, participants and other stakeholders. The Board is composed of four constituency groups – business, civil society, labour and the United Nations – with different roles and responsibilities from their overall

19 Out of the 400 NGOs participating to the Global Compact, 91% participates to the local level and only 9% to the global level. UN Global Compact Statistics on the participating Civil Society Organizations (2008).
advisory function. While the Board as a whole holds an annual meeting, the constituency groups are expected to interact with the Global Compact Office on an ongoing basis. Last, at the central level a Global Compact Leaders Summit is convened every three years in order to review progress and provide overall strategic direction for the Global Compact.

Turning to the Local Networks, they increasingly serve as engagement platforms for participants, and are supposed to both move innovative solutions upstream for global replication and multiplication, and to take global dialogue issues down to the level of implementation” (UN Global Compact, 2007, p.8). Multi-stakeholder participation in the Local Networks is crucial for the inclusive nature of the Global Compact, for ensuring critical thinking and a diverse set of skills and perspectives on how to address the ten Principles. Local Networks play also an important role in support of the communications on progress and integrity measures.

The Regional meetings work as knowledge management venue, by offering the opportunity to address issues which are relevant for the agenda of the Local Networks of a specific geographical area. While it is not possible to generalize for every Local Network, there are some regional peculiarities. European Local Networks are more focused on the network management and the advocacy function, the Asian Local Networks invest on an Annual Meeting to ensure visibility to the initiative, Latin American Local Networks elect training on the ten Principles as their main activity, and African Local Networks try to facilitate policy dialogue and partnership for development (Petersen, 2008).

Local Network representatives come together for an annual meeting, which permits representatives of Local Networks to share experiences, review and compare progress, identify best practices and adopt recommendations intended to enhance the effectiveness of Local Networks in achieving quality improvements. From 2006 this is facilitated by the Annual report that each Local Network is requested to provide.

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20 According to the 2007 Local Network Report 70 percent of all the Networks reported including civil society organizations, 20 percent reported including labour organizations and 10 percent reported engagement with academic participants.
Network governance and follow-up mechanisms

The UN Global Compact is an open and voluntary multi-stakeholder initiative that, like the OECD Guidelines, sees itself as a complement to – not a claim or a substitute for – instruments of regulation at national or international levels. It is clearly stated (UN Global Compact, 2008) that “the initiative is not designed, nor does it have the mandate or resources, to monitor or measure participants’ performance.” Nevertheless, with the aim of safeguarding the integrity of the United Nations Global Compact, a set of integrity measures has been introduced. The most important tool of these measures is the Global Compact’s policy on communicating progress, according to which participants are asked to communicate annually to all stakeholders their progress in implementing the Global Compact principles. If a participant fails to communicate its progress by the deadline, it is listed as "non-communicating" on the Global Compact website. Should a participant fail to communicate progress for two years in a row, that participant would be labelled “inactive” on the Global Compact website. Inactive participants are not permitted to participate in Global Compact events, including local network activities, until a Communication on Progress is submitted. If a third year passes without the submission of such Communication, the company is de-listed. This annual requirement has led to the delisting of about 1,000 participants (Kell and Slob, 2008). Since the beginning of 2008, the Global Compact has given significant visibility to the names of companies that have been de-listed for failure to communicate their progress.

Some observers (Slob, 2008) have interpreted this new organizational posture as a “ratcheting-up of standards and compliance mechanisms that have shifted from issuing the reporting guidelines to launching the integrity measures and requesting companies to address the ten principles in a more systematic way (Utting, 2008). It has also been considered as evidence of a

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21 Interview by the authors with Bart Slob, senior researcher at SOMO, member of the OECD Watch and , 16th and 17th March 2008.
22 Interview by the authors with Peter Utting, Deputy Director of the United Nation Research Institute on Social Development. 12th March 2008.
gradual process of “institutional thickening since the tremendous convening power of the UN is being reinforced by the development of Local Networks.”

However, the UN Global Compact Office seems to have a different view on the opportunity to scale up on its enforcement capacity both at the Global and at the Local Network level. Reports and interview are persuaded that the Global Compact “will remain a non-bureaucratic, open and voluntary initiative engaging a wide spectrum of participants across the globe. The only entry criteria is a participant’s willingness and ability to advance the Compact’s aims” (UN Global Compact, 2005, p.2).

As for the Local Networks, they are considered local organizations of stakeholders. “They are non UN entities and could be potentially organized even as NGOs […] Their goal is not enforcement. They have to provide encouragement, motivation and the incentive structure for business to adopt the ten Principles and to establish partnerships for development” (Petersen, 2008). The concept is reinforced by the Report on the New Governance Framework, stating that “apart from fulfilling the requirements included in their relationship agreements with the Global Compact Office, and generally acting in accordance with the Global Compact’s principles and objectives, Local Networks are self-governing” (UN Global Compact, 2005 p.6).

The lack of a procedure to process grievances and to seek re-address has attracted a number of criticisms on the Global Compact’s effectiveness. Since the delisting measure is “based largely on technical and procedural ground” and the sanctions for failure have been considered “unimpressive” (Kell and Slob, 2008, p.3), the Global Compact has been also labelled a “toothless code” (Zammit, 2003; Slob, 2008).

Another set of criticisms has focused on the opportunity-cost of the Global Compact, arguing that not only resources are diverted from other UN initiatives, but also the Compact ensures an alibi to corporations for not implementing stricter tools, such as the UN Norms on the Responsibilities of TNCs and Other Business Enterprises with Regards to Human Rights (Utting and Zammit, 2006).
The Global Compact does not react to these criticisms by strengthening its enforcement capacity, but rather by clearly positioning itself “not as a mediation, a dispute resolution or adjudicative body, nor an enforcement agency” (Kell, 2008), but rather as a transparency agency aimed at improving the quality of the information available and encouraging local actors to monitor the Communication on Progress. Illustrative of this position are the words of the Head of Partnerships and responsible of the Local Networks at the UN Global Compact Office:

“I don’t think we should have teeth at all. We are only a brand and our participants market this brand worldwide. We are a tiny little office with five units of staff, maybe fifteen including consultants, and we have been able to run the most important corporate citizenship initiative. I don’t think we are diverting any resource from other UN endeavours. We don’t have resources but, most important, we don’t want them. We don’t want to thicken our institutional structure, turning it into a bureaucracy. Our role is to make public the communication on progress that companies produce and we try to enable a more robust public accountability structure”(Petersen, 2008).

One tangible example of the Compact role as a global platform for corporate accountability is the recent warning sent by a group of influential investors to 78 listed companies for failing to publish progress reports. In January 2008 the investors, led by Morley Fund Management in the UK, have also praised a smaller group of mostly European companies for “notable” performance under the UN Global Compact. The prominent investor group has written to the chief executives of the biggest listed companies whose reports are late, urging them to comply. Steve Waygood, head of engagement at Morley, said the GC scheme was a valuable addition to global corporate governance and helped investors make decisions (Financial Times, 15th January 2008).

Discussion

There are strong similarities, as well as differences, between the two initiatives examined above: the OECD Guidelines and the UN Global Compact. Both are voluntary (i.e. not legally binding); they are adopted by countries in all continents,\(^\text{23}\) they cover common areas such as human

\(^{23}\text{OECD guidelines are now adopted by 39 countries, including 30 member states and 9 non-member states. The UN Global Compact Principles have been adopted by approximately 3700 businesses (December 2007) operating in more than 120 countries, and there are UN GC Local Networks in more than 80 countries.}

rights, labour, the environment and the fight against corruption; they include non governmental, labour, corporate and public organizations in their structures, and they are both organized as a central unit surrounded by a constellation of local chapters.

Yet, while the OECD guidelines are endorsed by governments, and in turn recommended to businesses, the UN Global Compact Principles are endorsed directly by corporations. While labour, corporate and non governmental organizations each have their own institutional role (in the form of sub-network) within the setting of the OECD Guidelines, this institutional arrangement is not provided by the Global Compact, which in principle solely concerns companies. Perhaps more important, while the OECD Guidelines has introduced a semi-judicial mechanism of dispute resolution (by which complaints are submitted by NGOs or local governments to the National Contact Point), the UN Global Compact relies on self-communication of progress, on the (weak) threat of delisting non-active corporations and a on role of Local Networks simply as knowledge-sharing fora, as opposed to adjudication entities.

We now return to the questions raised in the introduction, with a view to assessing the adequacy of the framework elaborated by Agranoff and McGuire (2001) for developments taking place in international organizations. The questions are as follows:

— How have the two international governance networks been activated?
— In what ways has the interaction among stakeholders shaped issue framing and the network re-adaptation?
— Have learning processes developed within the local and the global networks?
— Has the interplay between the governance structure of each initiative and the follow-up mechanisms significantly impacted business accountability?

24 In addition to these common themes, the OECD guidelines explicitly include disclosure and consumers protection.
25 The requirements for participating in the initiative include a letter in support of the ten principles from the CEO addressed to the Secretary-General, and an annual communication on the corporation progress in the implementation of the principles, addressed both to the Global Compact Office and to the stakeholders. Businesses failing to communicate their progresses are delisted.
We deal with the issue of activation in a broad sense. Activation is a crucial phase of network management because it determines the availability of human and financial assets, as well as information and skills accessible for the network which, in turn, affect its functioning mechanisms. The selective activation of potential participants is, indeed, a precondition for successful policy making and policy implementation (Scharpf, 1978; Agranoff and McGuire, 2001). In the case of governance networks associated with international organization initiatives, before addressing issues of participant selection and skill provision, one has to ask a preliminary and perhaps deeper question about activation. Where do the initiatives come from? By whom and for what purposes are they initiated?

In this respect, the experiences of international organizations analyzed above are not necessarily parallel to those taking place at the national or regional level, or, in more general terms, at all levels where a sovereign power is clearly identifiable. At the national level, one can safely assume that there is a mandate for a public agency to intervene in a particular policy area. Such mandate is generated through the traditional electoral mechanisms by which a government is directly (in presidential systems) or indirectly (in parliamentary systems) accountable to the citizens for the implementation of policies that correspond to the preferences of a clearly identifiable constituency. In order to fulfil its mandate effectively, generally the agency can decide either to put in place traditional command-and-control procedures, or a network of public and private actors. It is likely that in current circumstances – namely circumstances in which the problems to be resolved are too variegated and interrelated to warrant standardized solution, and require the direct involvement of actors with local knowledge and motivational/mobilization capacities – the latter is indeed the most effective solution.

In the case of the international organizations examined above, no clear constituency, nor mandate, are identifiable. The Organizations are not agents called upon to implement the will of a principal, but entrepreneurial actors that identify a vaguely defined problem area, and use it to carve a role for themselves, while simultaneously addressing a deeply felt problem. Neither the
OECD nor the UN has a mandate to regulate the behaviour of MNCs, let alone companies in general. Obtaining such a mandate would not be categorically impossible – in theory the two organizations could pass international law instruments to this effect – but it is practically impossible as the subject matter in question is too controversial to ever achieve the high levels of consensus (at the limit, unanimity) required to pass international law. The command-and-control option is not politically feasible for these international organizations, even in the unlikely case in which it was technically feasible. There is a diffuse perception, however, that something needs to be done about corporate behaviour, even though the various actors can not agree exactly as to what is to be done, and how deep-reaching the measures need to be. The organizations exploit this area of ambiguity to launch programmes that make minimal requirements on the constituents. By doing so, they avoid the most pressing problems of political acceptability – for example, by only requiring actors to subscribe to general statements of principles, devoid of clear legal definitions of what exactly such principles imply and by relying heavily on voluntary compliance and civil society involvement.

This leads us to the second question, namely whether or not such involvement is meaningful and whether it has led to a redefinition of the issues dealt with in the various programmes as well as of their operating mechanisms.

The evidence analyzed above suggests that in both initiatives the interaction among stakeholders, and particularly the involvement of NGOs, has not been meaningless but has shaped issue framing and determined network re-adaptation. In both initiatives, NGOs have ‘pushed for teeth,’ seeking to move from vague political statements to more actionable and legally embedded commitments, with various degrees of success.

In 2000 the OECD Guidelines were revised as a consequence of the interaction and negotiation among countries, companies, unions and NGOs. The ‘norms’ were updated by adding issues related to corporate behaviour that had emerged more recently, such as child labour or shareholders protection. In addition, the scope of the Guidelines was expanded to include small and medium enterprises. The most significant change, heavily lobbied by NGOs and Unions, pertained
the operating rules of the network, and specifically the establishment of National Contact Points and of a formal grievance procedure.

Similarly, in the case of the Global Compact harsh criticisms of NGOs and in particular the charge of enabling ‘blue-washing’ by corporations contributed to reshape the norms and the functioning mechanisms. Consequently, a 10th principle on corruption was included and integrity measures were introduced, requiring corporations to renew annually their endorsement and provide more timely and comprehensive information on their dealings.

As to the third question, namely whether there is evidence of learning processes within the networks, our answer can only be speculative, as our focus on the macro evolution of the programmes is ill-suited to address this question, which would require more in-depth studies (perhaps conducted through participatory observation and longitudinal analysis) of the various actors involved. However, it is clear that the institutional design of both programmes seeks to introduce learning opportunities. The OECD Investment Committee hosts four annual official meetings during which issues related to the Guidelines can be raised and discussed by any of the stakeholder representatives. One of these gatherings, the annual National Contact Points meeting, is structured as a workshop aimed at peer reviewing and bench-learning. Also, the National Contact Points are expected to organise seminars and to promote the Guidelines with the business community. Yet, the network itself is clearly evolving, also due to the pressure of NGOs, in the direction of a quasi-legal enforcement body, in which formal complaints are lodged by participating actors, and resolved (mediated) in quasi-judicial fashion by the agency, having heard the position of all the parties involved. Clearly, one cannot exclude the emergence of learning from an agonistic process such as a quasi-trial. However, in a trial setting actors are much more concerned with persuading a neutral third party of the correctness of their position, than they are with deliberating with the counterpart concerning the best possible way of proceeding (Baccaro, 2006; Baccaro and Papadakis, 2007). It looks as through the most recent developments in the OECD Guideline may turn out to be counterproductive for the emergence of real learning processes.
The institutional design of the Global Compact potentially leaves more room for mutual learning among the different stakeholders. Working groups at the central level address the issues and propose solutions concerning specific principles or industry sectors. The main purpose of Local networks, then, is to provide a venue for learning and discussion among businesses and, in some cases, among businesses, NGOs and Unions. As clearly stated by Global Compact officials, the programme has no intention of developing stronger “teeth” and, unlike the OECD Initiative, is keen to keep its current role of a transparency agency, one in which participating actors are asked to simply provide information, which is then publicly released. Often times, the sheer public character of the information released has important consequences for corporate behaviour. It bears emphasizing, in this respect, that the Global Compact is still not entirely transparent, at the least in the view of some of the actors involved, in the sense that the information requirements themselves are not especially far-reaching.

The last considerations lead us to address the fourth question, pertaining to the consequences of the various programmes for business accountability. Here again our answer is somewhat speculative. A proper answer would require longitudinal studies of participating and (matched paired) non-participating companies, in order to assess the effects of participation versus non-participation in the programmes. Even such a study, however, would unlikely be conclusive. All we can say here is that, at a general level, the purely voluntary nature of the schemes does not necessarily detract from their effectiveness. Indeed, information transparency is a powerful lever to change corporate behaviour, particularly in light of the fact that such information can be used by NGOs for “name and shame” campaigns that may have a deep impact on corporate reputations and bottom lines. The example reported above of investors threatening to divest from companies due to their failure to abide by the (weak) reporting requirements of the Global Compact is just one indication, among many, of the power of information and transparency in changing corporate behaviour.
Concluding Remarks

The main goal of this paper was to assess the extent to which the framework elaborated by Agranoff and McGuire (2001) with reference to national policy networks enabled us to make sense of apparently similar developments within international organizations. We were unable to fully address some of the questions, which (as argued above) would require a different research design and the shifting of the unit of analysis from the programme level to the level of participating companies and organizations. Overall, however, we find the Agranoff and McGuire (2001) scheme relevant and applicable to international network governance. One major difference pertains to the entrepreneurial role of promoting international organizations. These can hardly be considered agents that seek to effectively fulfil a principal’s mandate, but are more usefully regarded as entrepreneurs that identify a vaguely defined (but deeply felt) problem area, and use it to carve a new role for themselves, often outside their traditional mandates. If for national agencies there is possibly a choice between command-and-control mechanisms and public/private partnerships, depending on the particular technical configurations of the problems at hand, network management seems to be the only game in town for international organizations seeking to make a dent in some of the wicked problems of international governance.
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- Manfred Schekulin, Chair of the OECD Investment Committee and Director of the Export & Investment Policy, Austrian Ministry of Economics and Labour. 3rd April 2008.

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- Olajobi Makinwa, Civil Society Coordinator at the UN Global Compact Office. 20th May 2008.

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- Giovanni Moro, President of the Fondaca Foundation. In charge of the coordination of the Italian UN Global Compact Local Network 3rd December 2007.

- Peter Utting, Deputy Director of the United Nation Research Institute on Social Development (UNRISD), author of several reports on the two initiatives. 12th March 2008.

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