

**Trade Unionism: Differences and Similarities**  
**– A Comparative View on Europe, USA and Asia.**

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# **Trade Unionism: Differences and Similarities – A Comparative View on Europe, USA and Asia**

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## **1. Introduction**

This paper presents an outline of characteristics regarding trade unions in three different parts of the world, focusing on Europe, USA and Asia. The intention is on the one hand to describe and discuss differences and similarities between trade unionism in these three parts of the world, and on the other hand to identify general characteristics regarding trade unionism in the three regions that make it meaningful actually to talk about e.g. European trade unionism as something specific in contrast to Asian trade unionism and American trade unionism (and vice versa).

The analysis will due to the nature of the subject be highly abstract in the sense that most of the discussions will be based on very general considerations about trade unions characteristics in the different regions. However it seems necessary to insist on this kind of abstract analysis if the intention actually is to identify characteristics about the three regions.

The article will generally involve different kind of explanations of trade unionism and will also establish an overview regarding recent trends in trade unionism in the three regions.

Among the subjects discussed in the article are trade unions density, employer recognition of trade unions, tendencies toward decentralisation of collective bargaining and general characteristics and differences between trade union structure in the three regions.

Firstly the article will deal with trade unionism in Asia, focusing on Japan, Korea and Taiwan. Secondly focus will be on Europe, highlighting characteristics on trade unions in Germany, France, Great Britain and Denmark. Thirdly tendencies in US trade unionism is analysed. Finally a conclusive chapter summarise some of the differences and similarities in trade unionism in the different regions.

## 2. Trade Unions in Asia

Naturally it is possible to identify huge differences in the character and the size of trade unionism and trade unions in Asia. This is due to many reasons, e.g. different level of economic development and differences between the political systems among the countries in the region. Some nations - like e.g. Japan - are highly economically developed and industrial and post-industrial characteristics dominate the processes of production. Other countries - like China or India - are very economically diversified. In these countries some sectors are very technologically advanced, while others are dominated by pre-industrial modes of production. These differences are also seen in relation to the different political systems in the Asian region. In some countries the ruling political parties are strictly anti-union in their politics, other countries fundamentally accept trade unions as part of being a democratic society, while a third group of countries (e.g. Taiwan and South Korea) are in the middle of the process of democratisation.

The differences in general economic development and also the differences in the political systems define unlike conditions for trade unions in Asia. And in that respect it creates different possibilities for the development of trade unionism.

If we generally look on Asia and the Industrial Relations (IR) systems that dominate in the region, it is possible to identify a number of typical systems. Kuruvilla and Erickson argue that it is possible to identify six distinct types of IR-systems in Asia: ".the Japanese flexible-workplace model, the tripartite Singapore model, the state-employer-dominated model (Malaysia and Indonesia), the pluralist decentralized and fragmented IR model (the Philippines), the politicized multiunion model (India and the rest of South Asia), and the transitory model (a catch-all category that includes South Korea, Taiwan, China and Vietnam)" (Kuruvilla & Erickson (2002), p. 172).

Even though it is possible to talk about different types of IR-systems, and even though this constitute different conditions for trade union development in Asia, it is characteristic that most IR-systems have been established in the period after the second world war. In many Asian countries the establishment of national IR-systems is related to the detachment from the former colonial powers and to the establishment of Asian countries as independent nations.

In this connection it is worth accentuating - as it is done by Kuruvilla & Erickson (2002) - that the establishment of national IR-systems have been very much related to governments wishing a low level of conflicts on the labour market. Kuruvilla & Erickson argue that the primary motive for governments to develop IR-regulation in the Asian region (e.g. right to form trade unions, legislation regarding dismissal etc) has been that they hoped these kinds of regulation would lead to a low level of labour conflicts. This is e.g. the case in India: "In another example, DeSousa (1999) suggests that Indian labour laws were formulated with the explicit purpose of containing industrial conflict: to make it difficult for the parties to go on strike by mandating some form of third-party dispute resolution and by attempting to foster 'responsible' trade unionism rather than militant trade unionism in both colonial and postcolonial regimes" (Kuruvilla & Erickson (2002), p. 174-175).

If we look in general upon the level of trade unionism in Asia, it is obvious that most part of the labour force are not organised. In most Asian countries (except China) we find that below 20 percent of the workforce are member of a trade union. And very

often the level is below ten percent. Taken into account that big parts of the labour force often either work in the informal sector or in the agricultural sector this is however hardly surprising. If we look upon the level of trade union membership solely in the formal sector or in the industrialised sector, the level is generally higher (Kuruvilla & Erickson (2002)). This can be seen from table 1, where trade union density is outline for some selected countries.

**Table 1. Trade Union density in selected Asian countries, 1980-1999**

	1980	1990	1995	1999
Japan	31	25	24	22
Singapore	27	17	16	18
South Korea	16	17	13	12
Taiwan	26	49	50	44
India	18	19	Nn	Nn
China	Nn	69 (1985)	70	62
Phillipines	23	25	25	Nn

Source: Kuruvalli et al. (2002), p. 432

## 2.1 Trade unionism in selected Asian countries

This chapter focuses more specifically on characteristics regarding trade unionism in some selected Asian countries. We will focus on Japan, South Korea and Taiwan, due to the fact that these countries are among the most economically developed areas in the region, making it more possible to compare with Europe and USA.

### 2.1.1 Trade unionism in Japan

Although the development of an industrial relations system has its own history in every country, this seems to be more true for Japan than for other countries. History seems to play a considerable role if one tries to explain and describe the reality of industrial relations in today's Japan.

Firstly, the occupation of Japan by the United States after the Second World War has had a major impact on the development of Japanese industrial relations. As it is well known the U.S. introduced the legal basis for the Industrial Relations System in Japan, modelled after the similar system in the States. Earlier suppression of trade unions in Japan was suspended (Halliday (1975)), and union membership did rise after the war to approximately 45% of the working force (Tsuru & Rebitzer (1995)). The level of trade union membership has however declined from approximately 35 % in 1970 to 24% in 1995 (Traxler et al. (2001), p. 82).

Secondly, history and tradition also seems to play a big role in connection with the relation between management and workers in Japanese industrial relations. As it has often been pointed out Japanese workers have been less militant and more loyal to their company than workers in other countries. And more oriented toward team work structures in work organization (Sey (2000)). This has especially been the case since the first oil crisis in 1974 (Kuwahara (1996)).

The importance of history and tradition in Japanese industrial relations has been highlighted at a theoretical level in the so-called classical cultural approach, where the understanding of Japanese industrial relations have been related to traditional values in the Japanese society (Kinzley (1991), Wad (1996)). This approach has however been questioned by analyses focusing more on the development and solutions of conflicts in the Japanese society (e.g. Halliday (1975)).

The relations between management and labour in Japan have traditionally been characterised by at least two points. Firstly (1) it has been pointed out, that there are close relations between management and labour in the sense that management regard labour not only as an necessary expense, but as an essential resource for the company; and that labour regard the company not only as a means of obtaining a pay, but also as a mean to get a meaningful life. As pointed out by Park (1996): "The group is important for the Japanese and the company is one of the important groups. Japanese workers are loyal to their companies and work hard for their companies to succeed" (Park (1996), p. 66.).

The second (2) point traditionally highlighted when discussing Japanese labour-management relations is that unions are closely related to the single company (enterprise unions), meaning that unions are not as independent of the single company as it is seen in Europe or the U.S. Enterprise unions are the dominant form of labour organising in Japan also in the 1990'ies. As stated by Kuruvilla & Erickson (2002): "There is a general agreement that the central features of the Japanese IR system have included workplace-focused enterprise unions, lifetime employment systems, broad-based training and seniority-based wages" (Kuruvilla & Erickson (2002), p. 180).

The major trade union confederation in Japan - Rengo (formed in 1987) - that in principle represents about 7.7 million Japanese workers has no formal jurisdiction over the enterprise unions. As pointed out by Wad (1996): "...the new Rengo has no formal authority over the enterprise unions forming its membership basis. Status quo is that enterprise unionism prevails." (Wad (1996), p. 28).

The enterprise-oriented system of unions has influenced the fundamental relation between management and labour so that although industrial disputes are rather common, they seldom lead to strikes (Wad (1996)).

The economic crises during the 1990s have however changed the management-labour relations in some respect. Firstly management have tried to develop new types of more flexible employment conditions. Outsourcing, development of part time jobs etc. has been part of this strategy. All in all this has meant that the Japanese trade unions have faced decreasing memberships and decreasing membership loyalty (Kuruvilla & Erickson (2002)). For some commentators these trends are seen as major changes in Japanese industrial relations pointing toward a more individualised system of employment relations (Kuruvilla et al. (2002)).

### 2.1.2 Trade unionism in (South) Korea

If we talk about trade unionism in Korea it seems necessary to look upon trade unions before and after the processes of democratisation started in 1987. Before 1987 independent trade unions were not tolerated by the political authorities in Korea, and governments had a repressive attitude toward trade unions and trade union politics. "Prior to mid-1987, besides low union membership and rate of unionisation, labour had little or no effective collective voice even in unionised firms" (Jeong (2001), p. 60).

In Korea labour market was strongly regulated by the state in the 1960s and in the 1970s, and governments worked more for rapid economic development than for securing the development of an independent trade union (Kim & Kim (2003)). And even if employees had rights due to labour law (e.g. in relation to employment security) trade unionism was suppressed. As pointed out by Kim & Kim: "While American-style labor laws were enacted in 1953 and guaranteed full-fledged trade unions rights, throughout the 1960s and 1970s labor law was revisited frequently to put substantial restrictions on union activities. For example, labor legislation was amended in 1972 to suppress unions, and strikes were prohibited until 1980." (Kim & Kim (2003), p. 349).

On an organisational level FKTU (Federation of Korean Trade Unions) has been the only legal trade union up to the end of the 1980s, and FKTU was strongly related to different governments, and was organisational constituted at company level.

From the 1970s there have been tendencies toward establishment of an independent trade union. An independent trade union that since 1990 officially has been organised in KTUC (Korean Trade Union Congress). This independent trade union was however lawfully banned until 1997, where extensive strikes lead to the recognition of KTUC. "The late 1980s witnessed a turning point. The 'Democratization Declaration' by President Noh Tae Woo in June 1987 led to the greatest labor turmoil in Korean history, the 'Great labor struggle'. There were 3749 strikes in 1987, a 13-fold increase from the previous year." (Kim & Kim (2003), p. 350). KTUC tries to organise employees in industrial unions across the traditional company based trade unions.

Membership to trade unions increased during the changes in the late 1980s, but has decreased a bit since then. This can be seen in table 2.

1986	12,3
1987	13,8
1988	17,8

1989	18,6
1990	17,2
1991	15,8
1992	14,9
1993	14,1
1994	13,5
1995	12,6
1996	12,2
1997	11,2
1998	11,5
1999	11,8

Source: Kim & Kim (2003), p. 346

The economic crisis in 1997 meant a further setback for the Korean trade unions. This was related to the fact that some companies with strong trade union traditions went bankrupt (Kim & Kim (2003), p. 353).

A central issue regarding Korean trade unionism and Korean trade unions has been the role it has played in relation to the processes of democratisation. Labour market conflict has very often been pushing Korea toward political democratisation. This was the case both in the 1980s and in the 1990s. Trade unions have acted as a political factor in Korean political life, and their ability to influence Korean political life can e.g. be seen in relation to the law regarding the establishment of works councils in Korean companies passed in 1989. This law was partly passed due to militant demonstrations organised by the Korean trade union movement. "The initial Korean work council statute was enacted in response to militant antigovernment demonstrations led by unions in 1980 who were opposed to the head of state. With the liberalization of South Korean society in 1987 labor market institutions became less constrained." (Kleiner & Lee (1997)).

Traditionally the Korean labour market has had some of the characteristics also known from Japan. Lifelong employment and seniority based payment has been central characteristics in the Korean IR-system. Like in Japan - and other countries - these principles have been under pressure the last ten years. Performance based pay systems have developed, due to competition from other countries (e.g. China).

### 2.1.3 Trade unionism in Taiwan

Like in Korea general processes of democratisation have had an important influence on trade unionism in Taiwan. Trade unions in Taiwan was until the middle of the 1980s mostly looked upon as being part of the authoritarian political system and as organisations trying to implement government policies at company level.

Since the 1980s an alternative - and more independent - trade union movement has been growing, and this has had a certain influence. Political changes in the end of the 1990s have also led to expectations regarding the development of a more independent trade union movement. As pointed out by Chen et al. (2003): "Trade unions in Taiwan had long been seen as merely auxiliary institutions and administrative arms of the government for the implementation of national industrial policies, helping the government to drive economic growth. However, the situation has changed since the lifting of martial law in 1987, when groups of labor activists and antigovernment

leaders began to form unofficial enterprise-centered unions. Furthermore, the millennium was a turning point for workers and their organizations because the democratic Progressive party (DPP) replaced the Koumintang (KMT) as the ruling political party in Taiwan." (Cehn et al. (2003), p. 315). Chen et al. stress however that the changes have not been as big as expected and that the autonomy of trade unions is still quite restricted.

As one can see in table 1, trade union density in Taiwan is generally at a higher level than in the rest of Asia (except for (mainland) China). This is partly explained by the fact that membership of a trade union is mandatory and regulated by law. "Trade unions in Taiwan are regulated by the Labor Union law ... The law sets forth the structure, formation and obligation of trade unions. A union can be organized along craft/occupation or industrial lines when there is a minimum of 30 workers in an establishment... only one union is permitted per plant, and membership in the union is mandatory. Workers who refuse to join a recognized union can be suspended from their jobs at the behest of the union, although in practice many workers do not join unions because this measure of the law is not implemented effectively." (Chen et al. (2003), p. 320).

CFL (Chinese federation of Labor) is the only legal main organisation in Taiwan and is officially the only organisation that is allowed to represent employees at a company level.

Since the 1980s alternatives to CFL have been developing (e.g. TLF (The Labor Federation of Independent Unions)), but these alternative trade unions are still illegal although tolerated by the government.

Generally trade union density have tended to fall in Taiwan. However this does not necessarily mean that the Taiwanese trade unions have become weaker. As mentioned by Chen et al.: "That there are fewer unions and union members now than in the mid-1980s should not be seen as a diminution of union power because unions today enjoy much power, and their influence is widely felt... One reason for this is that these organizations have become more independent, so that their support cannot be taken for granted by the government." (Chen et al. (2003), p. 327).

## **2.2. Trade unionism in Asia - Conclusion**

The following part will try to highlight some characteristics regarding what is called Asian trade unionism. These characteristics are latter in the article compered with characteristics regarding trade unions in USA and Europe.

1) Asian trade unions are often organisationally decentralised and constituted on a company level. Company based unions seem especially to dominate in some of the countries analysed earlier in this article. Japan and Korea have a long tradition for company based trade unions<sup>1</sup>.

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<sup>1</sup> As mentioned by Jeong: "Frenkel (1993) found that in the early 1990s Korea and Japan owned the most decentralised union organization and bargaining structure among ten countries in the Asia-Pacific region." (Jeong (2001)).

2) In a number of countries trade unions have been under pressure the last ten years. This is e.g. the case in Japan. Among the causes to this pressure has been increased competition on the global market, which has led companies to be more interested in flexible and performance based pay systems. Existing national compromises, where trade unions have been accepted, or where a certain level of employee protection has been stipulated in labour laws is under pressure, due to the intensified competition. Companies are e.g. questioning the principle of mutual loyalty between the employees and the employers as seen in the principle of lifelong employment.

3) In some Asian countries - like Taiwan or Korea - trade unions have played an important role as a political actor in relation to the processes of democratisation. In these countries trade unions have gained influence and although trade union density has decreased for some years trade unions are getting stronger.

4) Cultural factors are sometimes used to explain why trade unions are generally weak in Asia (compared to e.g. Europe). The importance of Confucianism in especially the Chinese influences societies is used to explain the low level of conflicts between employers and employees. Chen & Snape write: "It has also been suggested that cultural factors have been important. This is reflected in the 'Neo-confucian' hypothesis, which suggests that workers in Chinese society will accept authoritarian management and avoid confrontation with the employer ... Such cultural arguments imply that the demand for collective representation is absent." (Chan & Snape (2000), p. 124). Cultural factors are correspondingly often mentioned when relations between management and labour in Japan are to be explained.

5) In many Asian countries it is possible to distinguish between an official and an unofficial trade union movement. In some countries - like in Korea and Taiwan - the unofficial trade unions seems to gain more influence.

6) In many Asian countries trade unions - and IR-systems - have been established in connection with liberation from former western colonial powers. In that respect trade unions have been used by governments as part of a nation building project. Therefore independent trade unions have been unusual in a number of Asian countries, and the main purpose of trade unions has in some cases mostly been to hinder conflicts between employers and employees in the name of the nation. As economic growth has dominated some Asian countries for quite a period some trade unions have freed themselves from more nationalistic projects and been more oriented toward working for more specific employee interests.

### 3. Trade Unionism in Europe

Trade unions have been strong in Europe for many years. And they have influenced European societies in many different areas. However the level of trade unionism differs very much, which can be seen in table 3.

<b>Table 3. Trade union density in selected European countries, 1997/1999/2000</b>	
	1997/2000
Sweden*	86 (1997)
Finland*	78 (1997)
Denmark*	76 (1997)
Cyprus**	70 (2000)
Belgium**	69 (2000)
Malta**	65 (2000)
Norway*	55 (1997)
Luxembourg**	50 (2000)
Ireland*	45 (1997)
Slovenian**	41 (2000)
Slovakia**	40 (2000)
Austria *	39 (1997)
Italy*	37 (1997)
Greece**	33 (2000)
Czech Republic**	30 (2000)
Latvia**	30 (2000)
Portugal **	30 (2000)
United Kingdom*	29(1997)
Germany*	27 (1997)
Holland*	24 (1997)
Hungary**	20 (2000)
Spain*	17 (1997)
Lithuania**	15 (2000)
Poland**	15 (2000)
Estonia**	15 (2000)
France*	10 (1997)

Sources: \* Source is Ebbinghaus & Visser (2000, 63), table WE 13/14 (a) (net density I (% dependent labour force). Non-employed members are also counted in the table. Concerning Sweden only employed members are counted.  
 \*\* Source is EIROOnline (2002)  
 \*\* \*Source is Kjellberg (2001, 27), table 1.  
 It should be noted that the data are not directly comparable across the different sources.

As can be seen from table 2, trade union density is especially strong in the northern parts of Europe, in countries like Denmark, Sweden and Finland. In southern parts of Europe the density seems generally to be quite lower as can be seen in France, Spain and Portugal.

Although Europe consists of different countries and different IR-systems, it is possible to locate some similarities among the IR-systems and among the trade unions.

This is especially the case if we compare Industrial Relations in Europe with the IR-systems in Asia and U.S.A.

Generally it is possible to locate at least four types of IR-systems in Europe (Jensen et al. (1995)).

Firstly, we can talk about a Nordic/Northern European model of industrial relation. This includes countries like Denmark, Sweden, Norway and Germany. Strong labour market organisations and very strong institutions that regulate relations between the labour market organisations characterise the industrial Relations Systems in these countries. Organised interests among both employers and employees have great influence on the labour market. And the trade union density is rather high, especially in Denmark and Sweden where around 80 percent of the labour force is a trade union member.

Secondly, we can talk about a British system of industrial relations characterised by a weak institutional and legal foundation. The British system includes especially UK, but also partly Ireland. Traditionally labour market organisations regulate the industrial relations area. The last twenty years there has been a major development in the way industrial relations are organised in UK. The regulation of the relations between management and labour through multi-employer bargaining has declined very dramatic, and has been substituted either by single employer collective bargaining or by more individualised relations between management and labour. And as pointed out by Korczynski & Ritson (2000), there have been tendencies, especially in UK toward derecognition of unions.

The third industrial relations system in Europe is related to the Southern part of Europe. This includes countries like France, Spain and Portugal. The labour Market organisations are very weak in these countries, especially if we define weakness in relation to membership. In France only about 10 per cent of the labour force are organised.

The weak labour market organisations have however meant that the state plays a very active role in regulating labour market conditions and industrial relations. The state is very active in defining rules and conditions on the labour market (Ebbinghaus (2002)). This means that although trade unions are very weak with regard to their membership basis, they are anyhow represented at work place level through institutions guaranteed by the state. Which means that the employees generally hold certain rights in their relation to management.

Fourthly the former eastern European countries can be regarded as a fourth type of industrial relations system. Although there are big differences between these former eastern European countries trade unions are here characterised by being in a period of transition. New forms of national industrial relations systems are under construction and trade unions are trying to get a say in this area.

The last ten to twenty years some European trade unions have generally experienced a falling membership support. This has e.g. been the case in countries like France, Germany, Great Britain and Holland (see table 4). However it is also possible to identify some European countries where trade union density has been stable or actually growing in the same period. In Sweden, Finland and Belgium density have increased the last years. This increasing support to trade unions can partly be explained in relation to growing unemployment in Europe. In these countries one can find a close connection between trade unions and the unemployment benefit system (the so called Ghent-system).

	1950	1960	1970	1980	1985	1990	1995	1997/99
Denmark*	56	62	63	79	78	75	77	76 (1997)
Finland*	-	32	51	69	69	73	80	78 (1997)
Sweden*	67	71	67	78	82	82	88	86 (1997)
Belgium*		42	42	53	51	50	53	Nn
France*	-	24	20	22	19	14	10	10 (1997)
Ireland*	42	50	59	64	63	59	52	45 (1997)
Austria *	62	60	57	52	52	47	41	39 (1997)
Italy*	44	25	37	50	42	39	39	37 (1997)
Spain*			45 (1977)	8	10	12	18	17 (1997)
Holland*	43	42	37	35	28	24	24	24 (1997)
Germany*	38	35	32	35	34	32	29	27 (1997)
United Kingdom*	45	45	50	56	50	41	36	29(1997)
Norway*	-	52	50	55	56	56	55	55 (1997)

Source: \* Source is Ebbinghaus & Visser (2000, 63), table WE 13/14 (a) (net density I (% dependent labour force). Non-employed members are also counted in the table. Concerning Sweden only employed members are counted.

### 3.1 Trade Unionism in selected European countries

The following paragraph will centre the analysis of trade unionism in Europe to some selected countries. These are Germany, Denmark, Great Britain and France. Germany, Great Britain and France are selected because trade unions in these countries all have come under pressure, while Denmark is chosen as one of the European countries characterised by a high and a rather stable trade union density level.

Also the countries represent different types of industrial relations systems, and different forms of trade unionism.

#### 3.1.1 Trade Unionism in Germany

As can be seen in table 5 union density has decreased rapidly in Germany during the last ten years. Just after the reunification of the former East and West Germany trade unions had a massive number of new members from the former East Germany. East-German workers joined in great numbers the trade unions in West Germany, and became part of the main organisation DGB. However growing unemployment in the former East-Germany have meant that many members quitted the trade union membership, and the total number of members in the German trade union movement are today at a lower level, than before the reunification. Membership levels in relation to the different main organisations in Germany can be seen in table 5.

**Table 5. Germany: Trade union membership distributed on main organisations, 1991 og 1998**

	1992*	1997*	2000**
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DGB (Deutscher Gewerkschaftsbund)	10.539.000	8.623.000	7.772.000
DBB (Deutscher Beamtenbund)	1.095.000	1.116.000	1.200.000
DAG (Deutsche Angestellten-Gewerkschaft)	578.000	507.000	451.000
CGB (Christilicher Gewerkschaftsbund)	315.000	304.000	Nn
Medlemmer i alt	12.528.000	10.532.000	Nn
Organisationsgrad***	32%	27%	Nn
Source: *Ebbinghaus et al. (2000); **Ebbinghaus (2002); *** Density is from table 2, (1990 and 1997).			

Changes in the employment situation in the former eastern Germany are however only part of the explanation to the declining support for trade unions in Germany. The problems are also structurally related to character of the membership base in the main German trade union DGB (main organisation). The membership base is highly related to the traditional industrial sectors in Germany, and to the public sector. And the traditional trade union member in Germany is a middle aged, male blue collar worker. Other groups on the labour market - women, white collar workers, young workers, workers employed in the service sector - are only in limited numbers member of a trade union.

When employment tends to shift from the industrial sector to the service sector, this naturally gives problems for traditional trade unions. If we e.g. look upon the trade union density among female workers in Germany compared to male workers, then it is obvious that the trade unions have not been able to organise these 'new' groups on the labour market. As Ebbinghaus et al. points out: "Although female membership increased absolutely and as a proportion of overall union members from 17% in 1950 to 22% in 1990, the degree of unionisation only slightly increased among women (from 17% in 1970 to 22% in 1990). On the other hand, among men a significant decline in union density took place in 1980s (from 50% in 1980 to 45% in 1990), as traditional union domains suffered from employment cuts." (Ebbinghaus et al. 2000).

Although it is possible to identify a decreasing trade union density in Germany, the German trade unions are still 'the strongest unions in the world', and German trade unions have still a major influence not only in the German society, but also as a leading trade union in the rest of Europe.

### 3.1.2 Trade Unionism in Great Britain

Trade unions in Great Britain have experienced major setbacks the last ten to twenty years. As can be seen in table 4 the density level has fallen from around 50% in the mid 1980s to around 30% in 2000. This reduction has been most visible in the private sector, where only around 18% of the labour force are organised in a trade union. This is comparable to a trade union density in the public sector at around 60% (Brook (2002)). Correspondingly collective agreements only covers approximately one third of the English labour market, mostly inside the public sector (Brook (2002)).

Institutionally the industrial relations system in Great Britain has traditionally been based on voluntarism. Trade unions and employers voluntary agreed on subjects concerning collective bargaining, and the state was non-interventionist. As mentioned

by Hyman: "The tradition of voluntarism meant that the state was reluctant to intervene directly in labour relations." (Hyman (2001), p. 69).

One reason why the British trade unions are in a very defensive position these years is related to the lack of institutionalisation of the British industrial relations system. The voluntarism in the IR-system - and the lack of general institutionalisation of the relations between trade unions and employers (either in relation to legislation - like it is known from Germany or France - or in relation to main agreements on the labour market - like it is known from Denmark) makes the trade unions very vulnerable to a lower level of membership support and to some employers' attempts to exclude trade unions from companies. As a consequence of the low level of institutionalisation in the British industrial relations system trade unions depend very much on their free marked capacity.

Trade unions in Great Britain traditionally have a very complex organisational structure. "It is customary to identify five 'ideal types' within British union structure: craft unions, industrial unions, general unions, staff associations and white collar unions. In practice, most of these types have never existed in true forms. The industrially-oriented unions ... failed to incorporate white-collar employees and some manual crafts, both of which organized their own union. At the end of the nineteenth century, craft unions were already entrenched when general unions were formed in response to the formers 'closed' unionism that left un- and semi-skilled manual workers largely unorganised." (Ebbinghaus & Waddington (2000), p.715). During the last ten years mergers have characterised the British trade union development (especially in TUC). This has reduced the organisational complexity a bit, however the number of trade unions that are related to TUC is far higher than the corresponding numbers known from e.g. Scandinavia and Germany.

### **3.1.3 Trade Unionism in France**

French trade unions are divided in different main organisations after religious and political principles. Mainly one can talk about a communist (or former communist) trade unions movement (represented by CGT), a social democratic trade union movement (represented by FO) and a Christian trade union movement (represented by CFTC). Although these three main organisations represent a broad political and religious spectrum in France, they all in all organise only around 10% of the labour force in France. This can be seen in table 3. Also the trade union density has decreased for the last twenty years (se table 4).

Compared with trade union movements in other parts of Europe the trade unions in France have traditionally been very ideological and political oriented. Hostility toward employers has also been a usual characteristic regarding part of the trade union movement in France. Establishing stable and institutionalised relations to the employers has not been high on the agenda of the French trade union. Visser et al. highlight the following: "French unionism is in many respect exeptionel: the relationship between capital and labour, and among unions, is more adversarial and ideologically charged than in most other European countries. The intrusion of and dependence upon the state is more pronounced. Trade unions are to a far greater extent fragmented and ideological, while political rivalry between different union currents and organizations is overwhelming." (Visser et al. (2000), p. 236).

In opposition to Great Britain the state highly influence industrial relations regulation in France. This is e.g. the case when French governments legislate on a great number of different subjects like working time etc. But it is also the case because of the well known extension mechanisms (*erga omnes*) that exists on the French labour market. These extension mechanisms make collective agreements cover the whole labour market, although the trade unions and the employers organisations only cover a very small part of the labour market.

### 3.1.4 Trade unionism in Denmark

Denmark is among those European countries where the trade union density is highest. As seen in table 3 and table 4 the density covers around 75% of the labour market, and although there has been a slight fall in the density the last couple of years, it is after all quite stable at a high level.

Even though the Danish society in many ways could be characterised as a post-industrial society the organisational structure of the trade unions in many ways reflects an industrial society more than a post-industrial society. The organisational structure among trade unions in Denmark is very much based on class and education. There are three main organisations on the labour market (Due et al. (1994)). This is respectively LO, which primarily organise skilled and unskilled employees, FTF, which represents employees with middle-range training (e.g. teachers) and AC, which represents employees with university education. The tendencies toward decreasing trade union density is especially seen in relation to the LO-trade unions movement and this trend is very much related to general changes on the labour market and changes in the composition of the labour force.

One of the causes behind the high level of trade union density on the Danish labour market is that the trade unions have managed to recruit employees outside the traditional industrial labour force. Women are equally members of trade unions compared to men. And high density rates are seen in sectors that in other countries are only partly organised. This is e.g. the case - which can be seen in table 6 - in the financial sector. Another factor that is important is the existence of a close relationship between the unemployment benefit system and the trade unions (Ghent-system).

**Table 6: Denmark: Trade union density in Denmark. Selected sectors, 2000**

Sector	Union density
Primary (agriculture etc.)	69
Industry (da:fremstilling)	81
Construction	86
Commerce	68
Transport	86
Financial sector	81
Public administration	90
Education sector	87
Welfare institutions	90
Other services	72

Source: Madsen (2000, 108), table 3.

The Danish industrial relations system is characterised by its strong institutionalisation of the relations between trade unions and employers organisations. This institutionalisation is primarily based on voluntary agreements made between the labour market parties. The first main agreement was done in 1899 (Jensen (2001)). Legislative regulation of the labour market plays only a minor role in Denmark. There is e.g. no legislation in Denmark that regulate conflicts between trade unions and employers. The workers right to strike and the employers right to lockout is primarily regulated through collective agreements made by trade unions and employers' organisations themselves.

The strongly institutionalised relations between trade unions and employers implicate, that trade unions are relative strong even in periods where unemployment is high, and where marked conditions generally are in favour of the employers side.

### **3.2. Trade unions in Europe - conclusion**

This part of the article will try to summarise some of the points made about the different European trade unions in the former chapter. Again the idea is to identify some specific characteristics concerning trade unions in Europe, although we are all well aware of the big differences in European trade unionism.

1) All in all the Industrial Relations Systems in Europe can - in spite of the existence of different national IR-systems - be characterized as generally orientated toward integration of labour representatives, whether this inclusion is established by collective bargaining or by law. There exists a high degree of labour inclusiveness in the different European countries. Even in countries - like France - where unions organize less than 10% of the labour force, organized labour has influence through legalised and institutional arrangements that extends collective agreements to the whole labour market.

2) Class based structuring dominate the organisational forms of trade unions in Europe. Generally the forming of trade unions in Europe have been very much related to the formation of European class society in the end of the 19'th century and the beginning of the 20'th century. This has meant that trade unions in Europe very often have been related to broader concepts of policy making in the interests of workers in a general sense. Trade unions have not only fought for better pay and working condition in a narrow sense, but have also worked for establishing broader political, civil and social rights in the European societies, e.g. in relation to development of a welfare state.

3) The decrease in trade union density in some European countries is partly related to and a consequence of the fact that European trade unions are formed on the basis of the class-structure in the industrial society. As a consequence of the changes in the structure of the labour force from being dominated by traditional (male) working class jobs to a more stratified labour force, trade unions have increasingly lost their traditional member base.

4) In those European countries where the trade unions have been able to deal with a more stratified labour force (women, white-collar workers, part-time employment etc.), there is no serious sign of decrease in the trade unions density.

5) Employers in Europe have generally wanted to have more flexible collective agreements during the 1990s. This has been one of the major challenges for trade unions in the last decade. However employers - and their organisations - are generally not trying to put trade unions in a more marginal position on the labour market (Great Britain seems to be an exception in this context). In many European countries - especially in the northern parts of Europe - trade unions are also looked upon as a partner, and not only as an opponent, by the employers.

6) In some European countries - like France and Germany - different kind of extension mechanisms exists (principle of erga omnes) which stipulate that collective agreements should apply for every employee in a given sector, whether or not he or she is a member of a trade union. These extension mechanisms highlight the problem of free riding on the labour market, and in some cases implicate that workers are not interested in becoming a member of a trade union.

7) The fundamental organisational principle in European trade unionism is that workers are organised either in relation to the sector they work in (industry unions), or in relation to their skill or education. Company based trade unions like those well known in parts of Asia is very uncommon. Horizontal and vertical ties between organised employees at different work places and in different companies are therefore generally very strong.

#### 4. Trade Unionism in U.S.

In the United States labour-management relations have traditionally been hostile, especially when one talks about organised labour.

U.S. employers have never in the same way as it is seen e.g. in Europe been interested in establishing general nationwide negotiations or arrangements with the trade unions. This has meant that the organisational structure and the collective bargaining structure in U.S. have traditionally been related to important industrial sectors like the automobile industry.

Trade union organising reached its peak in the mid 1940s when more than 40% of the labour force was member of a trade union. Trade unionism in US was traditionally oriented toward specific groups on the labour markets. Male, white, fulltime workers in the industrial sectors were – like in many other countries – the core of the trade unions movement. And the union movement strategies were specific oriented toward fulfilling the needs of these groups, and not other groups on the labour market. As summarized by Carter: “According to Aronowitz’s detailed account, by 1952, the US labour movement had left behind the mass mobilisations of the 1930s, and had turned inward. In the absence of a societal-wide push for a welfare state, collective bargaining produced a private welfare state. In the further absence of any strategy to organise the unorganised, unions laid the foundation for the charge that they represented narrow and privileged interests. Conservative and sectional practices grew, with racial and gender discrimination, institutionalised. Increasingly, unions were corralled into traditional areas, unable to benefit from the opportunities opened by growth of new industries and the increasingly diverse workforce.” (Carter (2001), p. 186).

Thus trade unions have experienced a major setback during the last twenty years. The result has been that only about 13% of the labour force in U.S. today is organised. “Decline continued almost unabated, leaving union density at 13 percent overall by 1999. Union members numbered 16 million, against 110 million unorganised, while American society grew increasingly unequal, and American trade unions increasingly isolated and politically irrelevant.” (Carter (2001), p. 187). General trends in trade union density can be seen in table 7.

1970	25%
1980	20%
1990	14%
1995	15%

Source: Traxler et al. (2001), p. 82

In United States there has been a tendency toward polarisation of trends regarding collective bargaining. On the one hand one can observe major conflicts on the labour market pointing toward continuing conflicting industrial relations. On the other hand one can also observe new kinds of agreements between labour and management, which points toward partnership agreements (Cutcher-Gerschenfeld et al. (1996)). And in AFL-CIO strategies have – in connection with the election of a new leadership in 1995 - tried to change in order to give some answers to the growing marginalisation of trade unions. A growing commitment to the development of a more partnership oriented attitude toward management and to the development of more performance oriented

work organizations, was among the answers (Carter (2001), Clawson & Clawson (1999)).

Also there seems to have been a more hostile attitude toward organized labour in U.S. throughout the 1980s and 1990s, this being one of the reasons why trade union density has drooped so much the last ten years (Clawson & Clawson (1999)). “Although these changes are worldwide, the level of employer hostility to labor is unique to the United States. The hostility is found in many areas – decertification, concession bargaining, and strikes, for example – but is most marked in organizing campaigns. The 1970s saw the emergence of systematic attempts by employers to maintain ‘union free’ workplaces through delays, ‘information campaigns’ and outright intimidation” (Clawson & Clawson (1999), p. 102).

Other important factors in explaining the membership decline include the general downsizing the traditional industrial sectors in conjunction with the emergence of new employment sectors, which have no tradition for unionisation (Troy (2000)).

Some of the consequences of the decline in union membership have been that trade unions demands are weak in negotiations. As mentioned by Clawson & Clawson (1999): “From 1945 to 1980, union wage settlements almost always involved wage increases; thereafter unions frequently made concessions on both wages and benefits.” (Clawson & Clawson (1999), p. 97).

#### **4.1. Trade unionism in USA - conclusion**

1) Trade unionism in US can be characterised as market based trade-unionism. This means that trade unions are mostly oriented toward securing the (narrow) interest of their members more than developing a broad welfare state attitude toward demands.

2) All in all it is possible to characterise the U.S. system of industrial relations as a system still more oriented toward the exclusion of the labour representatives and maybe integration of the single employee instead. Generally it is possible to identify a growing employer opposition toward trade unions and organised labour.

3) US trade unions are although it is not class based in the same way as the European trade unions very much based on traditional industrial society. It is however very weak in relation to post-industrial workforce, and the structural changes in the labour force explain most of the decline in the trade union density the last twenty years.

## 5. Conclusion

As discussed in the introduction to this article it is possible to identify many empirical and theoretical problems in comparing trade unions in three different regions of the world. Correspondingly it is problematic to talk about US trade unionism, European trade unionism and Asian trade unionism as if trade unionism were grounded in a regional basis. Neither in Europe nor in Asia is it possible to say that trade unionism is something homogenous. In a certain way it seems to be logical inconsistent to talk about Asian or European trade unionism. However when we have tried to talk about European, US and Asian trade unionism, the intention has been to see whether this abstraction could be meaningful anyhow. And although one can identify huge differences among the trade unions in Asia or among the trade unions in Europe, it is actually possible to locate some regional differences that make the abstraction meaningful.

In this section we try to summarise some of these meaningful differences and similarities between trade unionism in USA, Europe and Asia. The conclusion is concentrated around some different themes discussing subjects like tendencies toward decentralisation in the three regions, tendencies toward generally weakening trade unions etc.

A first point to be made concerns the question of declining trade unions density. Overall there is a general tendency toward lesser trade union membership commitment among employees in USA, Europe and Asia. Trade union density has decreased in many countries in the regions. There are many causes to this development, but changes in the structure of production (from industrialism to post-industrialism) seem to play an important role. Increasing unemployment in all three regions during the 1980s (in Europe and USA) and in the 1990s (in Europe, Asia and USA) is also an important factor. Many employees have left trade unions due to unemployment. The trends toward declining union density is however not unilateral. In some European countries density has been stable or even increasing during the 1980s and 1990s. In these countries trade unions have been able to organise parts of the labour force, which are working outside the traditional male dominated industrial sectors. Even though trade union density could be used to measure overall trade union influence on pay- and working conditions in a society, this is not enough. All though density have fallen in some Asian countries there are signs, that trade union influence generally does not decline, but incline. This is related to the fact that trade unions in countries like Taiwan and South Korea act still more as autonomous organisations in their relation to existing governments. This in fact means that trade union influence seems to develop in a positive way, although density rates are falling.

If we look upon the organisational structure among trade unions, unions in Asia, Europe and USA differ quite a lot when it comes to the fundamental characteristics of the organisations structure of the trade unions. It is clear that both the horizontal and the vertical relations between different trade unions are generally strongest in Europe. European trade unions have - whether they are formed along industrial lines or educational lines - strong ties to other trade unions. And very often it is possible to locate strong main organisations at a national level in Europe. This is e.g. the case in Denmark, Sweden, Germany and other countries. Correspondingly it is possible to locate strong corporative traditions in some - but absolutely not in all - European countries, which secure trade union influence on governmental policies in a broader spectrum of subjects. Asian - and US - trade unions are much more related to the single

company (Asia) or to a single sector (USA). Company based trade unions are very common in countries like Japan, Taiwan and Korea, and the relations to other part of the trade unions are generally weaker than in Europe.

It is - on a very abstract and generalising level - possible to identify some differences in the social and institutional basis of trade unions in Europe, Asia and USA. European trade unions are generally formed on the basis of Europe as a class society. Trade unions deal with traditional interests of the working class. This is the case when they focus more narrowly on pay- and working conditions, but also when trade unions focus on broader political and social rights related to the working class. This social base has given the trade unions a central role in European societies. In that sense one can talk about European trade unionism as what could be called class based trade unionism. US-trade unions have of course also a social base in the American working class. However from very early in the American trade union history, trade unions focused mostly on the narrow interests of their members. Broader political initiatives and interests have only played a secondary role in American trade unionism. In that sense one could talk about US-trade unionism as what could be called market based trade unionism. Asian trade unions are also related to both class and market conditions. However in some Asian countries, trade unions have also played an important role in nation building processes. Trade unions have dealt with the pay and working conditions of the employees, but in many situations policies have been related to the general interests of the nation. In that sense one could talk about (some) Asian trade unions as what could be called nation based trade unions. What can be seen in these years in e.g. Korea is that trade unions try still more to define themselves not only as nation based trade unions but as class and market based unions, who deals with the interests of employees independently of general national interests.

The question of globalisation and flexibility is the final subject we will mention in this context, although other differences and similarities between the trade unions in US, Asia and Europe also could be mentioned. Both in Europe, in Asia and in USA trade unions are challenged by what is called globalisation. Employers argue in all three regions, that global competition has intensified and that the consequences of this globalisation is a need for a more flexible, a more individualised and a more market based system of handling pay- and working conditions. Decentralised collective agreements have spread around in the three regions. Especially in certain European countries (like Germany) this tendency toward decentralisation have been looked upon with scepticism by the trade unions. If we compare USA, Europe and Asia it seems that the challenges from globalisation (or maybe more correctly: internationalisation) it most felt in Europe and Asia. The American economy is still very much an internal and national economy, and the exchanges of goods with other countries are very low compared to other European and Asian countries. However all in all globalisation - or internationalisation - seems to be one of the biggest challenges for the trade unions movement in the beginning of the 21. Century. Trade unions are fundamentally connected to nation states, and although attempts have been made to internationalise the trade union movement as a response to the internationalisation of companies and capital, these attempts have never been really convincing.

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