

# The making of sustainability standards in the Global South: power, contestation, and global value chain governance

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## Abstract

Sustainability standards are central to the governance of global value chains, shaping labour conditions and environmental practices. Yet established scholarship privileges standards originating in the Global North, creating a significant gap in understanding how sustainability governance is shaped for and within the Global South. Through a comparative analysis of standards in South African wine and Indian tea, this article shows that Southern standards are produced through relational and trans-scalar struggles embedded in uneven material power relations within and across value chains. By tracing their interaction with established Northern regimes, the article reconceptualises sustainability governance as a contested and polycentric field.

**Keywords:** standards; sustainability governance; Global South; globalisation; polycentric; power.

## 1. Introduction

Standards are widely recognised as central mechanisms in the coordination and governance of the global economy (Abbott and Snidal 2008; Mattli and Büthe 2003). Sustainability standards, which are process standards addressing labour and environmental conditions in production chains, have become pivotal instruments through which lead firms govern production between dispersed suppliers across global value chains (GVCs) (Ponte and Gibbon 2005; Nadvi 2008; Van Der Ven 2018; de Bakker et al. 2019; Ponte et al. 2023; Marx et al. 2024). Yet existing scholarship has overwhelmingly focused on standards originating in the Global North; examining how such standards shape production practices in the Global South and their intended and unintended consequences for producers, workers, and the environment

**Received:** 31 March 2025. **Accepted:** 24 May 2026

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(Ponte and Gibbon 2005; Bartley 2007; Auld 2014). Overall, the role of Southern actors in shaping sustainability governance therefore remains insufficiently theorised.

This limitation has become increasingly significant considering shifting patterns of global trade and consumption. Since the 2010s, emerging economies and expanding middle classes across the Global South have driven global demand across agricultural and manufacturing sectors (Guarin and Knorringer 2014; Schleifer 2023). These transformations raise important questions about how sustainability governance is being reconfigured in value chains that increasingly source from, and supply to, Southern markets (Nadvi 2014; Horner and Nadvi 2018). One important development has been the emergence of sustainability standards originating in the Global South, targeting domestic, regional, and/or global value chains (Schouten and Bitzer 2015; Langford 2019). The nascent research on these standards variously interprets such standards as either alternatives to dominant Northern models, as institutional expressions of local priorities, or as manifestations of greater state involvement and political resistance to Northern governance regimes (Hospes 2014; Schouten and Bitzer 2015). However, scholarship has yet to adequately explain how Southern standards emerge, evolve, and interact with established Northern regimes across value chains.

This article addresses this gap through a comparative analysis of sustainability standards in South African wine and Indian tea. Rather than conceptualising Southern standards as binary alternatives to Northern standards, we argue that they are actively constituted through relational and trans-scalar struggles embedded within uneven material power relations across GVCs. Southern standards emerge through processes of collaboration, contestation, adaptation, and negotiation involving corporate, state, and civil society actors operating across multiple geographical scales. Their development therefore reflects both the continued influence of established Northern governance architectures, and the growing agency of Southern actors in shaping sustainability governance.

Empirically, this article explores the development of the Wine and Agricultural Ethical Trade Association (WIETA) sustainability standard in South Africa, and the Trustea sustainability standard in India, tracing how these standards have evolved in relation to existing Northern sustainability regimes. The article asks: which actors and processes shape Southern sustainability standards, and how should these standards be conceptualised in relation to Northern governance frameworks? To address these questions, the article combines a GVC framework with insights from relational economic geography and neo-Gramscian approaches to power. This analytical framework enables us to examine both the material organisation of sector-specific production systems and the relational dynamics through which governance institutions are negotiated and transformed between public and private actors across multiple value chains spanning global, regional, and domestic markets.

*Our findings make three key contributions:* Firstly, the article shows that Southern standards are neither wholly autonomous from, nor reducible to the established Northern governance regime. Their formation is shaped by trans-scalar interactions between Northern and Southern firms, states and civil society organizations, reflecting enduring asymmetries in GVC power relations alongside growing Southern agency.

Secondly, we demonstrate the value of combining GVC analysis with relational approaches to power to capture the dynamic and contested processes through which standards evolve. The longitudinal approach offered by relational analysis demonstrates that processes of collaboration and contestation across space and time alter relations between actors and the design and implementation of standards. This approach moves beyond static understandings of Southern standards as territorially bounded or institutionally distinct projects.

Thirdly, we show that Southern standards simultaneously reproduce and depart from Northern governance models through processes of mimicry, adaptation, and divergence shaped by sectoral and geographical contexts. In sum, sustainability governance is increasingly heterogeneous and determined largely by relational power dynamics between corporate, state, and civil society actors who transect geographical scales spanning the Global North and Global South (Amin 2004: 226; Alford et al. 2021). Such relations and dynamics continue to be shaped by specific material structures of sector-specific GVCs.

Overall, this article reconceptualises sustainability governance as a contested and polycentric field of regulatory authority extending beyond the Global North. It advances our understanding of how Southern-led sustainability standards are shaped in an era of polycentric trade and diversified end markets, using a neo-Gramscian approach to theorise contestation and power across geographical scales of production and consumption. In doing so, it advances broader debates on governance, power and uneven development within the global political economy, and argues that future research on sustainability standards must capture the central role that value chain dynamics and embedded power relations play in shaping outcomes for labour and the environment in the Global South and Global North.

The article is structured as follows: Section 2 develops a geographically sensitive framework for analysing Southern sustainability standards, demonstrating how shifting configurations of trade and production are linked to relational processes of standard formation and the material power structures of GVCs. Section 3 outlines the comparative methodology and case selection and emphasises the importance of longitudinal research for studying Southern standard development. Section 4 examines the key sustainability challenges in Indian tea and South African wine and introduces the Trustea and WIETA standards. Sections 5 analyses how these standards are shaped through processes of collaboration, contestation, and negotiation among Northern and Southern corporate, state, and civil society actors across multiple scales of GVCs. Drawing on these findings, Section 6 highlights the article's conceptual and empirical contributions to scholarship on sustainability governance, power, and uneven development, before identifying directions for future research.

## 2. Unpacking sustainability standards

### 2.1 Introducing sustainability standards

Sustainability standards transmit complex information on working and environmental conditions to, and from sites of production to consumers in global end-markets (Nadvi 2008). Unlike public regulations, sustainability standards are voluntary, and historically have been primarily shaped by private and civil society actors—such as multinational firms, non-governmental organizations (NGOs) and trade unions—who cooperated in implementing such standards through multi-stakeholder initiatives (MSIs) (Fransen 2013). In this sense, standards have often been conceptualised as forms of private governance that operate through ‘soft’ power, structuring market access and production practices in the absence of formal legal enforcement (O'Rourke 2006).

However, a growing body of scholarship emphasises that standards are not merely technical or neutral instruments of coordination but are socially constructed and politically contested. From a neo-Gramscian perspective, standards form part of broader struggles over the organisation of production and the institutional rules governing global markets (Levy 2008). Their initial development was a response to concerted campaigns by consumer groups and NGOs in the 1990s to challenge ongoing evidence of labour exploitation and environmental degradation in GVCs. The target of these campaigns was the corporations or ‘lead firms’ coordinating GVCs, due to the relative failure of state regulation and enforcement in the context of increasingly transnational chains of production (Cashore et al. 2004). This shifts the analytical focus from standards as ‘tools’ of governance to standards as outcomes of ongoing contestation over power, legitimacy, and control within GVCs.

This perspective can be further deepened by drawing on Espeland and Stevens' (1998) notion of commensuration as a social process. Sustainability standards work by translating complex social and environmental concerns such as labour rights, dignity, or ecological sustainability, into measurable and comparable indicators. In doing so, they inevitably privilege certain forms of knowledge and value over others, often narrowing broader social concerns into auditable metrics. Yet, these processes are not fixed. They remain open to contestation, particularly as actors—especially from the Global South—seek to redefine what should be measured, protected, and valued within production systems. In this sense, standards

can be understood as sites of struggle over processes of commodification and decommodification, wherein competing visions of sustainability and social protection are negotiated across space and time.

Indeed, contestation has always been ongoing within the arena of sustainability governance. Whilst sustainability standards initially took the form of self-regulated company codes of conduct, civil society actors expressed vocal criticism of these regarding the lack of independence in monitoring and evaluation (Cheyns 2011). This led to a plethora of independently monitored, often sector specific, voluntary sustainability standards, now frequently referred to as MSIs. Unlike self-regulation, these standards tend to be co-designed by corporate, state, and civil society actors, with monitoring and certification undertaken by third party actors (Fransen and Burgoon 2014).

Overall, the development of sustainability standards in the Global North has demonstrated considerable heterogeneity in terms of their objectives, drivers, design, and implementation (Nadvi 2008). This aligns with Levy's (2008) neo-Gramscian argument that globalised production chains are essentially contested organisational fields in which actors 'struggle over the construction of economic relationships, governance structures, institutional rules and norms, and discursive frames' (Levy 2008: 944).

Whilst MSIs are extremely common, they can also emphasise different sustainability challenges within production. This is in part linked to the agency of specific organisations to shape the governance agenda at specific points in time. For example, Rainforest Alliance (RA) has a strong environmental component and is shaped by historical civil society activism around conservation in the Latin American context (Fanzeres and Vogt 1999). On the other hand, the Ethical Trading Initiative (ETI) was developed by a small group of well-coordinated NGOs and trade unions supported by the UK government, to protect workers' rights in GVCs via multi-stakeholder alliances (Barrientos 2000). In spite of these differences, we will refer to these standards as 'Global North' standards in this article, since they are shaped by actors who are geographically situated in Global North countries, and these standards are overwhelmingly governing production for Global North markets.

The proliferation of sustainability standards, whilst highly contested, are immensely significant as a means of transmitting information and regulating production in an increasingly interconnected global economy (Büthe and Mattli 2011). As discussed in this SI introduction, standards facilitate the interoperability and compatibility of goods and services, coordinate economic activities including the production of goods across borders and, in the case of sustainability standards, address concerns over social and environmental production processes. It therefore follows that state actors also have a key interest in this arena of global governance; given the political significance of sustainability standards in regulating sustainability and facilitating market access. Indeed, GVC scholarship has in recent years more carefully considered the multi-faceted role of nation states in governing global production (Smith 2015). This includes delineating states' 'facilitative' role in attracting and enabling GVC development, such as through trade, competition and industrial policies; alongside its 'regulatory' role in constraining firm behaviour by adopting and implementing social and environmentally oriented policies and regulations (Horner 2017; Mayer and Phillips 2017).

Critical studies highlight a core tension between these two roles, whereby state's efforts to regulate firm behaviour are at odds with its simultaneous imperative to facilitate markets, attract capital, and remain globally competitive (Alford and Phillips 2018). State engagement with sustainability standards often reflect these different objectives. On the one hand, there is much evidence demonstrating that states support producers' compliance with export-oriented sustainability standards to ensure market access. On the other hand, states may also seek to contest sustainability standards, due to their lack of alignment with the needs of domestic industry and national labour and/or environmental norms.

Regarding the interactions between state regulations and transnational sustainability standards, studies have documented the specific ways in which the 'layering' between public and private sustainability standards may affect implementation (Locke et al. 2013; Bartley 2018). Other studies highlight how states increasingly engage in MSI initiatives (Abbott and Snidal 2008; Locke et al. 2013; Bartley 2018). Moreover, initiatives such as the UN's Global Compact and the Organisation for Economic Co-operation and Development's Guidelines on Multinational Enterprises, underline the growing influence of

multilateral public bodies, working with international corporate actors, to improve environmental and social outcomes in trans-border production relations.

## 2.2 Sustainability standards: changing North–South dynamics over time

The so-called ‘standardisation gap’ between the Global North and South is a key dimension of global sustainability governance (Lund-Thomsen and Lindgreen 2014; Nadvi 2014). Some scholars initially suggested that sustainability standards are unique to Global North markets where consumer engagement with ethical forms of production are assumed to be more advanced (Kaplinsky and Farooki 2011). It is indeed the case that for the past few decades, sustainability standards have been driven by the interests of actors based in the Global North, with an expectation that Southern producers serving Northern markets must comply, as ‘standard takers’. This ties back to Levy’s (2008) insight that to the governance of GVCs are underpinned by material power dynamics, and the ability of more powerful actors in a value chain to set the norms and standards for others to comply with. A corresponding literature has shown how asymmetrical power relations manifest in a lack of Southern inclusion in Northern-led standard setting processes, with adverse implications for their overall reception, effectiveness, and scope (Cheyns and Riisgaard 2014; Okereke and Stacewicz 2018).

Yet, it is no longer the reality that sustainability standards are synonymous with Northern actors and interests. Recent studies demonstrate that Southern firms, states, and civil society actors are shaping the creation of sustainability standards for both domestic value chains as well as GVCs (Schouten and Bitzer 2015; Alford et al. 2021; Langford et al. 2023). Since 2010, there have been numerous examples of Southern sustainability standards implemented in various sectors, including tea, soya, horticulture, wine, and palm oil among others (Schouten and Bitzer 2015). Table 1 is an illustrative summary of empirical examples of Southern-origin sustainability standards based on an academic literature review. It shows how these standards have developed in sectors comprising a pre-existing concentration of Northern standards; raising important questions regarding the relationships within and across Northern and Southern standards, and why Southern standards have emerged in specific sectors at specific points in time.

Some studies suggest that Southern standards may be more closely shaped by national public actors, as compared to sustainability standards stemming from the Global North. In some cases, these have been interpreted as an outcome of state-led attempts to reassert sovereignty when it comes to the shaping of standards (Giessen et al 2016). Bartley (2014) finds that in the case of Chinese timber, national state agencies created an alternative domestic certification scheme to reduce the regulatory ‘space’ for Northern forestry standards. Similarly, in the case of Indonesian palm oil, the Indonesian government created a new certification programme (the Indonesian Sustainable Palm Oil standard) that challenged the dominant global sustainability standard in palm oil, the Round Table on Sustainable Palm Oil (Giessen et al 2016: 71). In contrast to attempts to differentiate, there are examples of Southern standards, driven by public actors, that seek to mimic Northern counterparts. For example, the Kenyan government responded to various reputational crises by incorporating substantive elements of various Northern certification schemes (e.g., RA, the ETI base code) to develop KS1758, a legally enforceable national standard applicable to exports from the entire Kenyan national horticulture sector (Alford et al. 2024).

The fact that Southern state actors may play different roles in sustainability standard development as opposed to Northern standards connects back to Levy’s (2008) call for a focus on the material structures of GVCs, and the ways through which different actors may seek to assert their agency to transform regulatory structures, whilst being simultaneously constrained by power asymmetries underpinning GVCs. The specific dynamics and power relations in sectors and GVCs may well play a determining role in shaping state action in relation to Southern standard development, and the extent to which national standards seek to challenge, or else mimic Northern standards.

We leverage the GVC approach as an analytical lens to locate and analyse the drivers and processes shaping Southern standards within the broader systems of production in which they are embedded

**Table 1.** Examples of emerging sustainability standards in the Global South.

| Sector/standard     | Northern sustainability standards                                                                                                                                                        | Emerging Southern sustainability standards                                                                                                                                                                                                                                  |
|---------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| South African fruit | <ul style="list-style-type: none"><li>• Ethical Trading Initiative (ETI) base code</li><li>• GlobalGap</li><li>• Fairtrade</li><li>• Sedex Members Ethical Trade Audit (SMETA)</li></ul> | <ul style="list-style-type: none"><li>• SIZA</li><li>• South Africa GAP (SA-GAP)</li></ul>                                                                                                                                                                                  |
| South African wine  | <ul style="list-style-type: none"><li>• ETI base code</li><li>• GlobalGap</li><li>• Fairtrade</li><li>• SMETA</li></ul>                                                                  | <ul style="list-style-type: none"><li>• WIETA</li><li>• Integrated Production of Wine Scheme</li><li>• Fairtrade Africa</li><li>• SA-GAP</li><li>• KS1758 (government legislation covering social and environmental conditions across horticultural value chains)</li></ul> |
| Kenyan horticulture | <ul style="list-style-type: none"><li>• ETI base code</li><li>• GlobalGap</li><li>• Rainforest Alliance (RA)</li><li>• Fairtrade</li></ul>                                               | <ul style="list-style-type: none"><li>• Trustea</li></ul>                                                                                                                                                                                                                   |
| Indian tea          | <ul style="list-style-type: none"><li>• RA</li><li>• Fairtrade</li><li>• UTZ certification (merged with RA in 2018)</li></ul>                                                            |                                                                                                                                                                                                                                                                             |
| Indonesian palm oil | <ul style="list-style-type: none"><li>• Round Table on Sustainable Palm Oil</li><li>• Rainforest Alliance</li><li>• Organic</li></ul>                                                    | <ul style="list-style-type: none"><li>• Indonesian Sustainable Palm Oil standard</li></ul>                                                                                                                                                                                  |
| Brazilian soya      | <ul style="list-style-type: none"><li>• Round Table on responsible Soy (RTRS)</li><li>• ProTerra Foundation</li><li>• Organic</li></ul>                                                  | <ul style="list-style-type: none"><li>• SojaPlus</li></ul>                                                                                                                                                                                                                  |

(Gereffi and Lee 2016; Ponte and Sturgeon 2017). The GVC framework enables us to map and analyse commercial and relational dynamics between lead firms, suppliers, and public and civil society actors that shape sustainability governance outcomes over time. We complement this with insights from relational economic geography (Amin 2004; Yeung 2005; Hughes et al. 2007), which emphasize how relations between actors across geographical scales influence governance processes, and how GVC expansion has generated hybrid and decentred modes of regulation that ‘transect geographies of regulation based on territorial jurisdiction and scalar reach’ (Amin 2004: 226; Alford et al. 2021).

Crucially, this combined perspective enables us to consider how sustainability standards drafted and implemented at different Northern and Southern geographical scales interact, blend, and evolve over time to shape the overall governance of sustainability in GVCs. Adopting a relational approach also foregrounds the temporal and scalar dynamics of power in GVCs, recognising that governance relationships are not unidirectional or solely dominated by powerful Northern actors. Rather, they involve shifting constellations of private, state, and civil society actors operating across scales, engaged in an ‘ever-changing mixture’ of collaboration and contestation that unfolds over time within the wider commercial context of GVCs (Coe et al. 2008: 288).

These shifting constellations are partially a reflection of significant changes in the contemporary global economy; predominately related to the expansion of South–South trade. We now observe global, regional and domestic value chains [GVCs, regional value chains (RVCs), domestic value chains (DVCs)] spanning Northern and Southern end-markets, each with potentially differing requirements on standards, rules, and norms. This requires researchers to take a more geographically sensitive approach to locating and



analysing Southern standards in the context of the particular value chains—global, regional, and/or domestic—in which they are situated. We therefore differ from [Levy's \(2008\)](#) assumption that production chains will always be dominated by Northern actors, interests, and ideologies, as the global economy has changed significantly over the past twenty years.

We thus take processes of standard development which occur between firms, states, and civil society organizations across the Global South *and* Global North seriously within our analysis. While the roles of different corporate, state, and civil society actors in designing sustainability standards is increasingly acknowledged, there is little understanding of the relational power dynamics within and between these distinct actors that underpin this process. Sustainability standards emerge through contested processes, involving debate and compromise between participating actors, both private and public operating across national and global scales ([Amin 2004](#); [Yeung 2005](#); [Hughes et al. 2007](#); [Alford et al. 2021](#)). These processes of contestation in turn are linked to the material structure of the global economy; which we argue is being increasingly transformed by the rapid economic development of countries in the Global South and the existence of global, regional, and domestic value chains headed by lead firms from the North and the South. Combined, this demands closer attention be paid to the dynamic processes of contestation and compromise that exist 'within and across private, public and civil society governance, and that serve to forge, challenge and transform hegemonic stability in GVCs' ([Alford 2020](#): 43), but in a multi-polar context. Such dynamics lead naturally to discussions not only of standardisation but also differentiation within the global context of sustainability standard setting.

In sum, we adopt a geographically sensitive approach to analyse distinct Southern sustainability standards, taking into account trans-scalar relational interactions between firms, states, and civil society actors spanning the Global South and North which—as we will demonstrate—influence the origin, evolution, and eventual formulation of Southern standards. It is these 'ever-changing' trans-scalar dynamics of collaboration and contestation which result in different formulations of Southern standards that simultaneously both mimic and diverge from their Northern counterparts, to which we focus our empirical case studies upon.

### 3. Methodology

This article draws on evidence collected across two separate studies that chart the emergence and development of Southern sustainability standards in the Indian tea and South African wine industries. The aims and objectives of the projects were similar in scope, meaning interview data were easily incorporated into our comparative analysis. Fieldwork was undertaken in the UK, the Netherlands, India, and South Africa from 2012–23 and consisted of in-depth, semi-structured interviews with a total of 125 individuals from lead firms, supplier firms, government bodies, trade unions and NGOs (see [Supplementary Table 1](#) for further details). We followed a longitudinal approach by collecting and analysing data from the same participants over an extended period. This allowed us to trace the processes, changes, and continuities in the development of WIETA and Trustea over a ten-year period ([Neale 2021](#)). Through this, we were able to trace how the changing structural features of value chains, and relations between relevant actors impacted both the origins and evolutions of these two sustainability standards; something which is often not fully captured in empirical research on Southern standards.

On average, interviews lasted between 60–90 minutes in length. Key commercial and institutional actors within Indian tea and South African wine were located using a GVC-based mapping exercise, utilising trade data, company reports, and other relevant secondary data. Interviewees identified were: (1) explicitly linked to the processes of formulating and implementing Southern sustainability standards; (2) key actors within the respective value chains of tea and fruit production; and/or (3) experts on Southern sustainability standards in the two respective countries. Open-ended interview questions included: how did the idea for this standard emerge? What was your role within the development of the standard? What were the key motivations? In what ways did collaboration and/or contestation within and across

the Global North and South shape the standard's development? Interviews also sought to uncover how the process of standard development intersected with the broader political economies of production within the two sectors and countries.

Both projects adopted University of Manchester's stringent ethical norms and research ethics regulations. All primary qualitative interview data were analysed through NVivo, using both descriptive and analytic coding schemas. Descriptive coding involved category labels that directly reflected themes, issues, and patterns reported by respondents. Analytic coding reflected wider themes and concepts within the two distinct research projects. Various published outputs emerged from the separate studies on South African wine and Indian tea (Langford 2021; Alford et al. 2024; Langford 2025).

Our comparative collaboration built on these initial findings. Both studies adopted the same conceptual frameworks and methodological approaches to collecting and analysing secondary and primary data, including very similar primary data open-ended research interview protocols. These methodological similarities facilitated our ability to comparatively re-analyse the primary and secondary data that had previously been gathered to address the research questions posed in this paper. This involved scrutinising the data around issues of contestation and collaboration across geographical scales and how this shaped the evolution of both standards. The value added of the comparative analysis is not only that it enriches our understanding of Southern sustainability standards. It also helps us chart the agenda for future research on sustainability standards and sustainability governance in and for the Global South.

## 4. Sustainability standards and the challenges facing Indian tea and South African wine

### 4.1 Indian tea

India is the world's second biggest producer, and fourth biggest exporter of tea (FAO 2024). However, domestic consumption far outstrips tea exports in both volume and value terms (FAO 2024). During the period of our study, the GVC for tea was dominated by two large MNCs, the British–Dutch conglomerate Unilever and the Indian conglomerate Tata which respectively accounted for 12 per cent and 4 per cent of the global tea market (Potts et al. 2014). In 2022 Unilever sold its global tea business to a private equity firm. The domestic value chain (DVC) for tea in India is also dominated by these same large firms with Hindustan Unilever (HUL—a subsidiary of Unilever) and Tata (through Tata Global Beverages—TGB) together controlling 54 per cent of the domestic tea market (Potts et al. 2014). HUL retained its dominance of the Indian tea sector despite the sale of Unilever's global tea business in 2022. The corporate ownership structure of the tea industry is therefore highly concentrated. These firms source tea through a complex set of intermediaries, as the leaf moves from producer to processor to blender (Langford 2021). In both the global and domestic value chains, there has been a shift away from vertical integration towards a value chain structure over the past twenty years (Langford 2021).

The Indian tea industry is divided into two distinct production segments: plantation estates (over 10.12 hectares in size) that produce approximately 52 per cent of Indian tea, and smallholder farms (below 10.12 hectares) which produce the remainder [Tea Board of India (TBI) 20189]. Plantations are governed by a range of national laws and regulations including the 1951 Plantation Labor Act (PLA), although regulatory circumvention is evident, and wages and working conditions for tea plantation workers can be poor (Neilson and Pritchard 2011; LeBaron 2018). Smallholder tea farms are not subject to the PLA. While smallholder-produced tea accounted for just 7 per cent of total production in 1991, this has grown rapidly and an estimated 180,448 small tea growers provide 48 per cent of India's total tea production (India Tea Association 2019).

Whereas plantation estates supply global and domestic markets, smallholders exclusively supply the domestic market. To export tea via the GVC, plantations must meet a range of product and process standards set by global lead firms and importing states (Neilson and Pritchard 2011). This includes private



standards governing labour and environmental concerns introduced by global lead firms, as well as national and regional food safety standards.

The Indian tea industry has recently seen significant shifts in the geographies of consumption. Since 2010, tea sales in Northern markets plateaued whereas the tea exports to Southern markets increased by approximately 33 per cent. In addition, there has been a significant increase in domestic tea consumption, meaning that almost 90 per cent of Indian tea production feeds domestic demand (Langford 2021). This warrants further consideration of how domestic production is governed. As stated earlier, the DVC is largely controlled by two lead firms: HUL and TGB. These firms are simultaneously local and global (HUL is a subsidiary of Unilever while TGB owns the British brand Tetley), with significant overlaps between their national and international identities (Langford 2021). However, while both lead firms only source from plantations for exports, they source from plantations and smallholders for the domestic market (Langford 2021).

Indian tea production for the domestic market is weakly regulated by private standards and public regulations in contrast to export-oriented tea. RA and other certification programmes tend to not cover smallholders or domestically focused plantations. Likewise, smallholders are largely unregulated by the state. Domestic lead firms have increased their dependence on smallholders in recent decades. In smallholder production, there is often a strong reliance on family labour, wages are unregulated and are often lower than for plantation-based workers (BASIC 2019).

Considering this, in July 2013, HUL, TGB, and the TBI announced the launch of Trustea ([www.trustea.org](http://www.trustea.org)); a new standard designed to govern tea produced for India's domestic tea market. Trustea is a code of conduct comprised of eleven chapters, each pertaining to different areas of regulation. This includes not only social chapters (labour standards in plantations and small tea gardens, worker protection, and welfare) but also environmental chapters (pesticides, waste disposal, and water management) and food safety standards. Trustea is funded by HUL, TGB, and the Netherlands-based leading international sustainable trade organization, Initiatief Duurzame Handel (IDH).

We now turn to examine the context of South African wine and sustainability governance.

## 4.2 South African wine

The emergence and proliferation of private sustainability standards in the South African wine sector, can be traced back to the democratic transition in 1994. The African National Congress (ANC) government opted for a twin-track agricultural strategy, involving market facilitation in the form of de-regulation and trade liberalisation; alongside extensive labour regulation to redress labour exploitation under apartheid (Ewert and du Toit 2005). This had a profound impact on commercial fruit and wine producers, previously protected under an apartheid-system of state-controlled marketing boards.

The ANC's agricultural policies exposed producers to powerful UK and European retailers, and in global competition with other Southern fruit and wine growing nations (Mather and Greenberg 2003; Kritzing et al. 2004). From 2016–17 the UK was a major buyer of South African wine, procuring 21 per cent of all packaged and 24 per cent of all bulk exports (Alford et al. 2021). Since 2006, Scandinavian countries such as Sweden and Denmark have also become key export markets. Most strikingly, however, over 50 per cent of South African wine production is now sold domestically within South Africa (Statista 2025). The emergence of new export destinations and growing domestic consumption have reduced an overreliance on UK buyers (ibid). Despite the 'continuing domination of white ownership in the industry', post-apartheid wine production has also involved a shift towards more heterogeneous farm ownership dynamics, with an increasing number of black entrepreneurs (including local politicians) and overseas Northern investors, alongside processes of vertical integration with the Dutch-owned multinational brewer Heineken taking over the leading South African alcoholic beverages producer Distell (Ponte et al. 2023: 2).

South Africa's post-apartheid raft of labour regulations is widely recognised as being comprehensive and progressive, but weakly enforced by under-resourced state agencies. Studies indicate that South African labour regulation in the agricultural sector has been more successful in protecting shrinking

numbers of permanent workers on secure contracts, but unable to regulate a growing body of flexible, seasonal workers employed on short-term, insecure contracts (Visser and Ferrer 2015; Alford 2016).

WIETA emerged as a South African MSI to protect what was (and still is) recognized as a particularly vulnerable farm-working population and enhance the wine industry's ethical reputation to retain market access to key Northern markets (Du Toit et al. 2008; Ponte and Ewert 2009). WIETA's core function is to offer different private, state, and civil society stakeholders a platform to discuss predominantly social (but also environmental) sustainability issues facing the wine sector and collaborate on potential solutions (McEwan and Bek 2009). The WIETA board comprises ten members, five of which are nominated by industry organisations, three by trade unions, and two by civil society. Following its inception, WIETA's remit also included carrying out voluntary audits on its farm membership, prioritising compliance with national labour legislation and certain stringent industry standards (Interview, WIETA representative, 6 June 2012).

As we will elaborate in the following section, continual processes of collaboration and contestation involving private, state, and civil society actors across the Global North and South has underpinned Trustea's and WIETA's emergence and evolution. Having outlined the sustainability challenges facing the Indian tea and South African wine sector, we now turn to analyse these two Southern sustainability standards, demonstrating how relational processes over time shape these new institutions of value chain governance.

## 5. Comparative case study: origins, evolution, outcomes

### 5.1 Origins

#### 5.1.1 *Trustea*

The origins of Trustea reflect the complex interplay of firms, states, and civil society actors shaping its creation across the global and domestic value chains of Indian tea. Its development stemmed from Unilever's ambition to expand sustainability governance from Global North markets to Global South markets. Unilever was the first major tea buyer to introduce sustainability standards into the tea GVC; adopting RA certification in 2007 for its European and Australian sales. Unilever later reported that the use of certification was found to collate with increased market share in these key markets (Henderson et al. 2002). Just three years later in 2010, Unilever launched the Unilever Sustainable Living Plan (USLP) which stipulated that by 2020 all goods sourced by Unilever must be sustainably produced across all markets in which they operate, including those in the Global South. In India, this required aligning standards with Unilever's subsidiary, HUL. HUL is responsible for tea procurement for sales in the domestic market.

Under the USLP, Unilever initially attempted to expand RA certification into Southern markets, which would have rendered Trustea unnecessary. However, in India, RA's code of conduct clashed with national labour laws as RA stipulated that the minimum age for labour must be fifteen, while Indian labour law allowed workers aged fourteen (Langford 2019). RA also struggled to engage small tea growers supplying the domestic market due to the farmers fragmented and unorganised nature. Following these challenges, Unilever decided that a tea-specific, India-specific code was needed, and that this would necessitate the involvement of HUL who handled procuring, marketing, and selling of tea within the domestic value chain. RA was invited to contribute to the development of this new sustainability standard, and elements of its tea code were incorporated into Trustea's code of conduct.

However, Trustea's creation was also shaped by domestic pressures. In 2013, one year before its launch, HUL and other domestic-facing firms were targeted by an Indian NGO campaign that exposed pesticide misuse in smallholdings, violations of national food safety standards, and the use of banned chemicals. This provoked a widespread public outcry by Indian consumers (Greenpeace 2013).

Overall, it is possible to state that from its inception, Trustea emerged from a convergence of pressures emanating from different actors in both the global and domestic value chain.

### 5.1.2 WIETA

WIETA originated from an international media campaign in 1997. Two UK-based wine connoisseurs and activists exposed poor working conditions on South African wine export farms via UK- and European-based media outlets, resulting in an international call to boycott South African wine. To contain the reputational fallout, in 2002 the South African wine industry accepted the UK ETI proposal to introduce a South African wine ethical pilot scheme. The pilot measured wine grower's anticipated compliance with the ETI base code, considered a legitimate international benchmark for adequate farm working conditions. Many wine producers were familiar with the ETI base code, given major UK retailers had been demanding compliance with it since the 1990s.

The ETI's pilot was a precursor for the establishment of WIETA in 2004, which emerged through trans-scalar collaboration between the ETI and South Africa's wine industry (e.g., Vinpro and Wines of South Africa), civil society [e.g., Food and Allied Worker's Union (FAWU) and Centre for Rural and Legal Studies (CRLS)] and government stakeholders (e.g., Departments of Labour and Agriculture). WIETA was (unsurprisingly) heavily informed by the ETI base code, whilst containing key variations aligned with national legislation and certain contextual difficulties facing the wine sector (Interview, WIETA representative, 6 June 2012). For example, WIETA incorporates and raises awareness of new South African health and safety and labour legislation, whilst also comprising standards that surpass legislation and tackle more complex contextual issues such as the nuances of sexual harassment and exploitation associated with third-party labour brokers. WIETA also seeks to adapt itself to the local context by promoting joint worker/management participation and educating workers on employment standards and codes (Interview, WIETA representative, 6 June 2012; see also [McEwan and Bek 2009](#)). WIETA is therefore a South African MSI established through trans-scalar dynamics of contestation in the form of civil society campaigns targeting international retailers' reputational currency, and collaboration between Northern and Southern actors seeking to improve working conditions on South African wine farms.

The story of Trustea and WIETA's origins creates a complex picture of the relational dynamics shaping Southern sustainability standard development. Both standards emerge from a set of challenges facing public, private, and civil society actors across the respective value chains. Whilst both standards are clearly steered by Global North interests, it is simultaneously apparent that local realities shape the need to develop new standards which are partially differentiated from Global North standards. This challenges the idea that Southern sustainability standards are necessarily political challenges to Northern standards.

## 5.2 Evolution

### 5.2.1 Trustea

Trustea's institutional design was led by Solidaridad Asia; an India-based NGO (with Dutch funding and linkages) and HUL. Together, the two organisations worked on Trustea's code of conduct and developed an internal governance structure comprised of various committees of stakeholders and funders. Financial support was secured through IDH, a Dutch state-funded body focused on sustainable trade. Whilst IDH had an established Tea Improvement Programme, its focus on Global North markets had been criticised, and together with Solidaridad, Southern markets became a new focus ([Langford 2019](#)).

Despite the powerful role of Global North actors and interests in Trustea, the standard would in the end become a national Indian standard governing the domestic market. There was considerable interest in increasing its legitimacy in the eyes of domestic industry and trade unions by including national stakeholders within its development. Solidaridad and IDH initially pushed to move away from constructions of 'Western coalitions' to 'local convening with local industry, local government' (Interview NGO, 4 April 17). Following this vision, the original stakeholder committee included a broad array of actors—from planter associations, smallholder associations, trade unions, bought leaf factories, and NGOs. Yet, by the time Trustea launched in 2013, trade unions, NGOs, and smallholder groups were absent ([Langford and Franssen 2022](#)). In their place sat IDH and Solidaridad. In addition, RA had been invited to join the committee. This process of exclusion was internally contested by some members but came about due to the

adversarial relationship between industry and trade unions and the mutual distrust between parties. Some participants alluded to the fact that industrial relations in India were very different to the Netherlands, and the MSI model would simply not work in this context.

Following this outcome, members determined that state involvement would now be pivotal in securing Trustea's legitimacy. Yet, this was also contested internally as the corporations worried Trustea might become dominated by the political interests of the government, and the role of 'powerful bureaucrats' (Interview NGO, 23 March 15). Nevertheless, it was agreed that the TBI, a state marketing board and regulator for the sector should be invited to be a committee member and play a role in shaping the standard.

The TBI had sought to improve trade facilitation and had responded to the aforementioned NGO campaign on pesticide mis-usage by developing a Plant Protection Code which regulated which pesticides were used and offered training to smallholders on how to use pesticides. This response had been criticised as a form of self-regulation, and so there were clear benefits to the TBI joining a more formalised standard. Yet the Tea Board was hesitant when approached because it did not trust the 'Dutch fragrance' of Trustea. It finally agreed to join when the second largest domestic MNC, TGB, decided to sign up too. Overall, the Tea Board's role demonstrated its ambition to facilitate capital by supporting the reputation and export development of the tea industry, whilst simultaneously being interested in responding to domestic environmental concerns. The precise form and shape of the Tea Board's actions were shaped by the key tensions between its role as both facilitator and regulator of GVCs. Table 2 illustrates the key private and public actors involved in the shaping and implementation of Trustea.

Despite these challenges, state involvement increased the legitimacy of Trustea as it could now be discursively positioned as a 'national' standard. TBI membership helped convince tea plantations to join, even though some were sceptical about the potential influence of corporations in the shaping of a national, public-linked tea standard (Langford and Fransen 2022). Once the TBI joined, the Trustea standard became discussed as a government-led response to public concerns within the Indian Parliament, demonstrating the desire of the state to be associated with its development. It seemed apparent that Trustea offered legitimisation to a government department that had previously failed to regulate production effectively (Langford 2019).

A final set of challenges facing the evolution of Trustea emerged between some internal parties and RA. RA held internal positions on both Trustea's Programme and Advisory Committees and had been invited to be a member by Unilever. As such, large parts of the Trustea code imitated RA's code, and the latter organisation expressed a desire for Trustea to be a 'stepping stone' for producers to also obtain RA certification. Additionally, whilst RA was deemed unsuitable as a domestic standard by Unilever, the certifier continued to pursue its own expansion in the Indian tea market; therefore, making it a potential competitor from the perspective of some Trustea members. As more domestic organisations became involved, including planters who had largely negative experiences of RA, there was increased concern that RA was benefiting from insider-knowledge which could be used for their own domestic market expansion (Langford and Fransen 2022).

Whilst the impetus for Trustea originated largely from the Global North, the increasingly powerful role of national Indian actors inside the standard illuminated the political tensions between Global North and Global South standards within the sector. RA argued that it maintained higher labour and environmental

**Table 2.** Actors shaping and implementing Trustea.

|              | Civil society                      | Private                                     | Public |
|--------------|------------------------------------|---------------------------------------------|--------|
| Actors/scale | NGOs and trade unions              | Firms/producers                             | State  |
| South        | Solidaridad Asia                   | Hindustan Unilever Tata<br>Global Beverages | TBI    |
| North        | Solidaridad<br>Rainforest Alliance | Unilever<br>Tata Global Beverages           | IDH    |

benchmarks than Trustea and that Trustea was a ‘food safety’ rather than a sustainability standard. Such discussion points were echoed by the Global North sustainability standards body ISEAL Alliance, who argued that Trustea could not join as a member organisation because it had not sufficiently met the criteria for being an MSI. Trustea responded by arguing that its code of conduct had higher legitimacy because it addressed the specific challenges of the Indian tea market, such as smallholder inclusion. It became increasingly clear that what had begun as a Northern-dominated process was now evolving in response to increased contestation between different actors and across different scales.

### 5.2.2 WIETA

Shortly after WIETA’s conception, a British media campaign in 2006 exposed poor working conditions on South African fruit export farms, with important implications for WIETA’s evolution as an ethical monitoring organisation. The international NGO ActionAid and the South African NGO, Women on Farms (WoF) collaborated in a trans-scalar ethical campaign targeting Tesco, a leading UK-based supermarket and major buyer of South African fruit. In an innovative move, the NGOs purchased a single share in Tesco and funded a female South African farmworker to attend a key shareholder meeting in the UK, where she publicly raised the issue of poor working conditions on South African fruit farms serving Tesco. Then in 2007, WoF invited the actress and international celebrity Emma Thompson to South Africa, who denounced through national and international media outlets, poor working conditions on South African fruit farms serving UK retailers. Tesco responded by internally reviewing its ethical auditing policies, whilst entering a collaborative agreement with WIETA to monitor compliance with its code on farms supplying Tesco, despite WIETA being initially conceived by and for the South African wine sector. Tesco judged WIETA best placed to monitor ethical compliance on both wine *and* fruit farms in the Western Cape, due to its context-specific knowledge and perceived legitimacy having been conceived in collaboration with the ETI (Interview, WIETA representative, 6 June 2012).

These trans-scalar developments had significant national and local consequences for the South African wine sector. Tesco’s suppliers voiced concerns that audits were being imposed on them. South African fruit growers were unhappy that Tesco was using WIETA—originally focused on the wine industry—to monitor their farming operations. Fruit growers challenged this via Fruit SA, an influential fruit industry representative organisation, who reportedly distrusted the radical nature of WIETA’s board comprising significant civil society representation. Fruit SA were also unhappy with WIETA’s extensive control over the entire monitoring and audit process, including setting standards, recruiting auditors, reviewing audit outcomes, and determining who should or should not be WIETA certified. These local rifts between fruit industry actors and WIETA manifested in a confrontational campaign led by Fruit SA. This resulted in Tesco’s South African fruit suppliers refusing WIETA audits and, more significantly, the fruit industry’s development of Sustainability Initiative of South Africa (SIZA) as its own ethical trade organisation and standard. SIZA was intended to be palatable to fruit industry stakeholders and farmers; avoid audit duplication by individual retailers; and enable the fruit industry to control standard making, particularly following dissatisfaction with WIETA imposed audits.

Shortly following WIETA’s conception, ongoing tensions between South African actors was evidenced by South African civil society organisations’ (except for one union that had very low levels of worker representation) refusal to engage with SIZA (Interview, South African civil society representative, 18 June 2012). This was due to the SIZA board’s lack of civil society representation, which CSOs perceived to be at odds with WIETA’s arguably more progressive board structure comprising trade union and NGO representation (e.g., FAWU, CRLS, Black Association of the Wine and Spirits Industry (BAWSI) Agricultural Workers Union of South Africa and Sikhula Sonke). South African CSOs publicly criticised SIZA for being a means to protect producer and industry interests, as opposed to achieving more transformative and sustainable social improvements on farms. Table 3 summarises the key private and public actors involved in the shaping and implementation of WIETA.

In late 2012 a significant wave of farmworker protests occurred throughout grape vineyards in the Western Cape, led by precarious farmworkers on fixed-term and insecure contracts whose central

**Table 3.** Actors shaping and implementing WIETA.

|              | Civil society                                 | Private                         | Public                                            |
|--------------|-----------------------------------------------|---------------------------------|---------------------------------------------------|
| Actors/scale | NGOs and trade unions                         | Firms/producers                 | State                                             |
| South        | WoF<br>BAWSI<br>CRLS<br>Sikhula Sonke<br>FAWU | Vinpro<br>Wines of South Africa | Department of Labour<br>Department of Agriculture |
| North        | Action Aid                                    | Tesco                           | ETI (multi-stakeholder body)                      |

demand was a significant wage increase.<sup>1</sup> Worker unrest originated on fruit farms, but the international reputational fallout was arguably more severe for the wine industry as wine is often branded and thus more vulnerable to reputational damage. Moreover, the Swedish government operated liquor monopoly Systembolaget is a major buyer of South African wine. Systembolaget exerts strict control over wine sales and its sourcing practices are subject to much closer monitoring and pressure from CSOs relative to individual commercial buyers. Consequently, during and after the worker strikes, Systembolaget threatened to halt its procurement of South African wine, unless the industry could improve farm working conditions within roughly two years.

This prompted an immediate phase of trans-scalar collaboration between Systembolaget and WIETA, with Systembolaget demanding all its South African wine suppliers to be WIETA compliant. Inevitably, WIETA audits increased and by the end of 2014, 60% of South African winegrowers were WIETA accredited and in 2017, WIETA had as many as 1453 members (up from 575 in 2013) (Alford et al. 2021). Due to WIETA's growing importance as an ethical auditor during the crisis, it initiated an ethical certification seal for producers to visually demonstrate compliance and use for marketing their product (Interview, Scandinavian monopoly and procurer of South African wine, 20/12/2023).

Inadvertently, however, the seal also became a point of localised contestation between the South African wine industry and labour representatives. Wine industry bodies argued for a more lenient approach to farm audits, to help suppliers retain market access and economic viability. In response, South African worker representatives campaigned to convince Systembolaget of ongoing, inadequate working conditions on South African wine farms. An influential documentary produced in 2016 exposed poor working and housing conditions on a WIETA certified farm supplying Systembolaget. This resulted in key Scandinavian buyers either immediately auditing or halting supply from the farm mentioned in the documentary altogether.

The evolution of Trustea and WIETA points to the highly complex relations on the ground in sites of commodity production. It is clear in both cases that local resistance to Global North standards was present within domestic industry and that this created issues of mistrust. In the case of Indian tea, both trade unions and planters shared negative experiences of RA and were hesitant about yet another MSI governing the sector; especially one that was driven largely by Northern interests and even included RA within its committees. The decision for the Tea Board to join as a local state actor is seen therefore as a pivotal moment in creating legitimacy at a domestic level and Trustea's subsequent success has come from state support.

In the case of South African wine, there are similar political challenges facing WIETA and its linkages to Northern actors and interests. In addition, the relatively high inclusion of civil society actors sits at

1. This process resulted in a wage increase from R69 to R105 per day, which the government acknowledged was still inadequate to sustain basic living costs, whilst recognizing that further increases could cause farm closures and widespread worker retrenchment



odds with the demands of domestic producers and is challenged through the development of SIZA as an alternative Southern-origin standard. Yet, labour struggles in the industry once again led Global North actors to exercise considerable power in the value chain by demanding compliance with WIETA, leading to higher uptake of the standard over time. As is the case with Trustea, there is a high level of antagonism between industry, state, and civil society actors across the North and South; demonstrating significant political tensions in relation to ‘who’ should govern producers.

Table 4 provides a broad summary of the origins and evolution of Trustea and WIETA in a context of multipolar trade comprising GVCs and DVCs. It is only through a temporal study of these two standards that we are able to see precisely how these relational dynamics alter the character and/or success of Southern standards.

## 5.3 Outcomes

### 5.3.1 Trustea

Trustea reveals the highly relational and trans-scalar nature through which it developed as a Southern sustainability standard. From its inception, Northern actors played a key role in its design and subsequent implementation; but its development was also born out of a failure for the dominant Northern standard governing the tea GVC (i.e., RA) to adapt to the domestic market. Trustea also depended upon Southern actors, including state support for its uptake and legitimation, but the inclusion of trade unions and other local civil society actors was internally resisted. Overall, Trustea was shaped by processes of

**Table 4.** Tracing the evolution of Trustea and WIETA in GVCs.

|                                              | Trustea                                                               | WIETA                                                                                                                                                                           |
|----------------------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Actors</b>                                | 2013<br>Unilever (Hindustan Lever)<br>Solidaridad<br>TBI              | 2004<br>International media campaign led by Northern activists<br>ETI<br>South African civil society organizations                                                              |
| <b>Origins</b>                               | Original impetus Unilever—but also domestic pressures (scandal)       | Original impetus—global pressure via international media campaign                                                                                                               |
| <b>Evolution</b>                             | Collaboration and contestation over time                              | Collaboration and contestation over time underpinned processes of standardization (alignment with ETI) and differentiation (evolving audit mechanism following industry crises) |
| <b>Relationship to GVC actors</b>            | Broadly aligned—but tensions between Rainforest Alliance and Trustea  | Lead firms pushed it from a voluntary to an enforced compliance tool                                                                                                            |
| <b>Relationship to domestic actors (DVC)</b> | Exclusionary of local CSOs—but explicit state involvement             | Local contestation with fruit industry (SIZA), as well as different interest groups within WIETA (private vs civil society)                                                     |
| <b>Southern features</b>                     | Smallholder inclusion and bought leaf factory inclusion<br>State role | Multi-stakeholder governance structure, involving private, state, civil society.<br>Transitioned from voluntary ethical audit to an entry-barrier for the Scandinavian market   |

collaboration and contestation across geographical scales and between actors, demonstrating aspects of divergence and convergence in relation to Northern standards.

### 5.3.2 WIETA

The case of WIETA elucidates the trans-scalar relational dynamics underpinning its genesis and evolution as an ethical organisation and sustainability standard. Whilst processes of convergence with the ETI base code during its inception enabled WIETA to gain legitimacy in the eyes of key Northern buyers, WIETA quickly became a target of civil society activism which challenged its transition from an organisation promoting voluntary ethical practices to a gate-keeper of economically essential Scandinavian markets (Interview, civil society representative, 28 May 2021). WIETA was also subject to internal tensions between competing wine industry bodies seeking to retain market access and labour representatives looking to protect worker interests.

These tensions prompted a dynamic process of contested differentiation, with WIETA pivoting its strategy in an effort to remain relevant and legitimate in the eyes of competing South African stakeholders. WIETA tried to engage more proactively with farmworkers via farmworker-engagement events and workshops, where WIETA's policy on freedom of association was discussed, worker grievances aired, and WIETA's code and audit process publicised to farm workers (Interview, civil society representative, 12 August 2021). Following the 2012/13 labour crisis WIETA continued to adapt its strategy by explicitly recognising the pitfalls of private social auditing and differentiating itself by focusing on locally embedded initiatives, such as engaging in open and courageous social dialogue in communities and workplaces, and building capacity to achieve broader community based social and ethical remedies.<sup>2</sup> What is striking here is that *who* is considered important for local input creates tensions not only between Northern and Southern actors but also between different actor 'types' (NGOs, state, and firms).

## 6. Conclusion

This article has addressed a significant gap in scholarship on sustainability governance by examining the emergence and evolution of Southern sustainability standards through a comparative analysis of South African wine and Indian tea. It asked two interrelated questions: which actors and what processes shape Southern sustainability standards, and how should these standards be conceptualised in relation to Northern governance frameworks?

Our findings demonstrate that Southern standards are not solely products of nationally bounded or exclusively Southern processes. Rather, they emerge through relational and trans-scalar struggles involving firms, states, NGOs, trade unions, and industry associations operating across intersecting value chains. In both cases, actors associated with the Global North remained influential in shaping standard development, albeit through different mechanisms and strategic interests. In Trustea, Northern influence operated through the organisational power of multinational lead firms embedded within domestic value chains; illustrating how governance dynamics associated with global production chains continue to shape standards, even when directed towards Southern markets. In WIETA, transnational activist pressure and reputational concerns within key export markets generated collaboration between Northern retailers, MSIs, and domestic industry actors. These findings challenge accounts that position Southern standards primarily as state-led or nationally constituted alternatives to Northern governance models (Schouten and Bitzer 2015; Giessen et al. 2016; Bartley 2018).

However, the empirical findings also demonstrate that Northern influence does not imply Northern dominance in any straightforward sense. Across both case studies, Southern actors exercised significant agency in shaping institutional outcomes, securing industry legitimacy and stabilising standards over time. Yet, neither Northern nor Southern actors constituted internally coherent blocs. Instead, the

2. For further information, see WIETA's strategy: <https://wieta.org.za/our-strategy/>

development of Southern standards was characterised by ongoing tensions and negotiations between commercial, state, and civil society actors advancing competing understandings of sustainability governance; including internal disagreements over ‘what’ or ‘who’ should be included in the new standards. The findings therefore reveal sustainability standards to be politically contested institutional forms rather than stable arrangements, even in cases where there appears to be a strong national agenda at first glance. Global North actors may continue to play a powerful role in the development of Southern standards for a variety of different strategic interests.

Conceptually, the article advances scholarship by combining GVC analysis with relational economic geography and neo-Gramscian approaches to power. This framework enables us to move beyond static or territorially bounded understandings of Southern standards and instead analyse how governance institutions are continuously reshaped through interactions across space and time. By tracing the longitudinal evolution of Trustea and WIETA, we show that standards are not fixed institutional arrangements, but dynamic outcomes of collaboration, contestation, adaptation, and strategic negotiation. This relational perspective also demonstrates how the material structures of specific value chains condition the possibilities for governance, shaping both the distribution of power and the capacity of actors to influence institutional design.

Our findings further suggest that Southern standards should not be understood either as straightforward alternatives to Northern standards nor as simple extensions of them. Rather, processes of mimicry, adaptation, and divergence occur simultaneously. Southern standards are shaped by existing Northern governance architectures and the broader material organisation of GVCs, while also being reworked through local political struggles, sectoral dynamics, and geographically specific institutional contexts. Sustainability governance therefore increasingly reflects a polycentric and uneven field of regulatory authority, extending beyond the Global North. Southern actors are not simply ‘standard takers’ but nor are they now clearly ‘standard makers’. Sustainability governance is instead always shaped by the materiality of specific value chains, and this is important to consider in the analysis of standards; especially when norms are contested by different actors along the chain (Levy 2008). By foregrounding the relational and trans-scalar dynamics through which standards are formed and transformed, we show that the power to define and operationalise sustainability is unevenly distributed, yet open to strategic reconfiguration through alliances and contestation across firms, states, and civil society actors.

These findings hold policy implications. Firstly, policymakers should avoid treating Southern sustainability standards as secondary forms of governance in relation to established Northern regimes. Formal institutional recognition could alleviate burdens of producers, such as audit burdens or compliance costs. Secondly, our findings highlight the importance of considering more carefully the interests of Southern civil society actors in sustainability governance and the important role they might play in building legitimacy and stability within processes of standard development. Finally, policymakers designing new due diligence regulations, particularly in the Global North, should recognise the increasingly polycentric nature of trade, and therefore sustainability governance, and engage more substantially with Southern governance institutions, rather than imposing universalised regulatory templates.

To summarise, this article has contributed to international debates on governance and uneven development in the global political economy by reconceptualising Southern sustainability standards as relational sites of power. The capacity to define, operationalise, and enforce sustainability standards remains unevenly distributed across value chains, yet these arrangements are continuously contested and reconfigured through alliances and struggles spanning the Global North and Global South. Understanding sustainability governance therefore requires greater attention to the relational and material dynamics through which standards are produced, stabilised, and transformed.

These arguments have important implications for future research. As Southern markets, firms, and regulatory actors become increasingly central to global production and consumption, analyses of sustainability governance must move beyond assumptions that authority resides primarily within Northern institutions. Future studies should take seriously the intersecting material structures of global, regional, and domestic value chains as constitutive of governance outcomes. Combining value chain analysis with

relational approaches to power offers an important basis for understanding how emerging standards may simultaneously reproduce, reconfigure, and destabilise existing forms of uneven governance.

At a moment when climate change and environmental degradation are intensifying pressures on global systems of production and consumption, understanding the evolving politics of sustainability governance has become increasingly urgent. Southern sustainability standards are likely to play a growing role in shaping these trajectories. Yet, as this article has shown, such standards should not be understood as fixed regulatory solutions, but as evolving institutional outcomes of relational struggles over power, value, and authority within GVCs.

## Supplementary material

[Supplementary material](#) is available at *Journal of Economic Geography* online.

*Conflicts of interest.* None declared.

## Funding

None declared.

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