Doing global investments the Nordic way
The "business case" for Equinor's support to union work among its employees in Tanzania

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Abstract: In the Nordic countries, unions are represented in company boards and can influence companies' policies toward labor abroad. This article focuses on the Norwegian national oil company Equinor and its support of unionization of its employees in Tanzania. This was inspired by the Nordic tradition of social dialogue between corporations and strong, independent unions. Corporation managers and union representatives tend to refer to this social dialogue as "the Norwegian model," but this is a narrow conceptualization of the model that disregards the role of the state. I argue that while it is beneficial for the Tanzanian workers to be organized, it is probably also "good for business" to have unionized workers who have adopted the Nordic collaborative model, rather than a more radical union model.

Keywords: CSR, extractive sector, industrial relations, labor rights, oil and gas, petroleum, Tanzania, trade unions

Multinational corporations (MNCs) engaged in resource extraction in the Global South have been heavily criticized. One response by MNCs has been to formulate corporate social responsibility (CSR) strategies (Gilberthorpe and Rajak 2017). CSR is essentially a concept embedded in US capitalism and is seen by most companies as being "good for business" (Harvey et al. 2017; Knudsen, Rajak, et al. this issue). Anthropologists have argued that CSR is often designed "to give an image of morality" (Rajak 2011b), and Catherine Dolan and Dinah Rajak suggest that we see CSR as "an evolving and flexible and overlapping set of practices and discourses . . . through which business (re)makes and asserts itself as an ethical actor" (2011: 5–6).

National oil companies control 80 percent of the global oil resources (ILO 2009), but until now, the majority of studies of oil and gas companies and their conduct abroad have looked to privately owned companies (Frynas 2009). There is a need to expand the study of MNCs that are engaged in resource extraction to also include national oil companies. This article looks at the case of Equinor, an MNC that originated as a Norwegian national oil company, and their efforts, in collaboration with a Norwegian union, to support union work among its

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employees in Tanzania. Up to now, few scholars of CSR have looked at the relationship between CSR and labor rights, or CSR and unions (Harvey et al. 2017: 43).

In a comparative study of unions in Europe, the authors found that Nordic Union representatives are generally skeptical of the concept of CSR, and push for formal General Framework Agreements (GFAs) rather than voluntary and informal CSR. The authors also argue that in contrast to European and global NGOs, which may spread negative information about companies, unions in Europe are concerned about protecting jobs and therefore do not wish to undermine corporate reputations (Rees et al. 2014: 12).

In Norway, the relationship between Equinor, and the union where the majority of the employees are organized, Industri Energi, is very close, and the Union branch at Equinor Norway has a more influential role than what is commonly found in MNCs. In contrast to most other countries, trade unions in Norway have certain mandatory and codified rights, and therefore a strong legitimate status (Løken and Barbosa 2008; Rees et al. 2014). The reason for this is the tripartite system: the formalized and strictly regulated interaction between corporations, trade unions, and the government in Norway.

The tripartite system is often referred to as the Nordic model, and the defining characteristic of the model is the "influence that the labor movement has on capital and the state" (Knudsen, Rajak, et al. this issue). This is a result of specific economic and political developments that took place in the interwar period, and the Nordic countries share some characteristics, including egalitarian traditions, the welfare state, and "labour market politics and regulations" (Ervasti et al. 2008: 3).

The Nordic model and the Norwegian model are terms that are often used interchangeably by scholars who study Norwegian industrial relations. Espen Løken and Freitas Barbosa state that these two concepts are not well defined, but that six characteristics are often emphasized when the Nordic or Norwegian model is described: "Universal welfare arrangements and a large public sector; high employment, among both men and women; small wage differences and a large degree of social mobility; strong collective actors; both centrally coordinated wage formation and local bargaining at company level; close cooperation between the government, employers' associations and trade unions as well as strong co-determination and participation at company level" (Løken and Barbosa 2008: 13).

In this article, I demonstrate that both the Norwegian management of Equinor and the Norwegian union and branch representatives tend to emphasize a very narrow aspect of what scholars and many politicians alike consider to be the Nordic model. Some corporation managers and union representatives equate what they refer to as "the Norwegian model" with a close relationship between managers and staff based on cooperation and dialogue (related to the sixth point on the list above), and they apparently disregard the other characteristics.

I argue that Equinor's effort to support union work at its office in Tanzania is a result of the company's genuine belief that cooperation with trade unions is "good for business," but also that the company's relatively substantial support of union work was the result of two coincidences. First, the union members of the Equinor board visited Tanzania and encouraged the staff to unionize. Second, an independent splinter union, National Union of Mine and Energy Workers of Tanzania (NUMET), had recently been established in Tanzania and had already attempted to recruit the staff. I show that the efforts to establish a local branch caused clashes and conflicts between the branch and the management, as well as between the branch members.

Several authors have emphasized that there is considerable diversity in trade unionism, both within and between countries (Harvey et al. 2017: 45; Tran et al. 2017). They have therefore argued for the importance of understanding labor struggles and unions "within their political and historical context" (Neve 2008: 214). I show how Tanzanian labor history, combined with the extremely asymmetrical relationship both between the Norwegian and the Tanzanian union and between the management and staff at the Equinor office in Tanzania, influenced the local union branch and led to the adoption of a model in which good collaboration with the management is listed as the union's highest goal.

The article is based on ten shorter field trips in Norway (Oslo, Stavanger, and Bergen) and eight in Tanzania (Dar es Salaam, Lindi, Mtwara, and Mwanza) over a period of four years (January 2016 to December 2019). I wanted to understand the interrelationship between different levels/strands of the company both horizontally (between workers or union representatives in Norway and Tanzania) and vertically (between company leadership and union representatives in both countries).

During this fieldwork, I visited Equinor offices, union headquarters, other civil society organizations, and the proposed site for a Liquefied Natural Gas (LNG) plant. I held meetings and/or interviews in English, Norwegian, or Swahili with a large number of Equinor staff and branch and union leaders in Norway and Tanzania, including two Equinor board members, three different country managers of Equinor Tanzania, and top union leaders in both countries.[1]

The corporate context restricted the degree of participant observation as Equinor offices are under strict surveillance in both Norway and Tanzania. One can only enter the premises by invitation, entrance requires digital registration and one must carry a visitor's tag visible at all times. Employees at the Oslo offices, somewhat embarrassedly, admitted that they had been instructed to restrict visitors from leaving meeting rooms alone and, if required, to escort visitors to the bathroom and wait outside. Thus, I have limited ethnography of the day-to-day union work. Unstructured interviews, documents that branch leaders have shared with me, as well as follow-up conversations via email and phone/skype are therefore the main sources of information for this article.

The article is organized as follows: the first section comprises a literature review covering corporate social responsibility, the role of NGOs and unions, transnational labor activism, and traveling models. The second section provides background information about Equinor and its relationship to labor both in Norway and in a few other countries in which it operates. The third section starts with some background information about the company's investments in Tanzania before I describe in depth the process of building up a local union branch at Equinor Tanzania, the conflicts that arose, and the outcome. In the concluding remarks, I argue that while the Norwegian industrial relations that entail close collaboration between business and trade unions was born through conflict, the Norwegian union Industri Energi,[2] which organizes most of the "blue collar" workers in the oil and gas sector in Norway, offers a relatively ahistorical message to their "partners" in the Global South that cooperation is the way to go, and this has been adopted locally. If Equinor invests in Tanzania and hires thousands of employees, it will be "good for business" to have union leadership in place that sees good collaboration with the management as a central goal.

CSR and transnational labor activism: Two disconnected fields

Despite an increasing focus on CSR among corporations, a number of ethnographic studies have demonstrated that MNCs behave in a way with negative consequences for workers, host communities, or both (Rajak 2011a; Welker 2009). NGOs have played a central role both as "watchdogs" and partners in relation to CSR. A relatively large body of literature looks at how various stakeholders pressure companies to adopt specific policies. As Michael Gold, Lutz Preuss, and Chris Rees emphasize, however, "it is striking that trade unions play a limited role in the literature on CSR," and while "workers are often the addressees of CSR activists, their influence on shaping CSR and how CSR affects their well-being are rarely studied" (Gold et al. 2020: 136). Similarly, overviews of anthropological work on CSR show that labor rights and the role of unions have received limited attention (Dolan and Rajak 2011: 2; Spencer 2018; Welker et al. 2011).

Sabrina Zajak and her co-authors' review of the literature on how transnational advocacy networks support domestic struggles of labor show that "trade unions are no longer viewed as a central player" (Zajak et al. 2017: 903, 916), and Mark Anner found that in the cases where unions do take part in voluntary social compliance programs, the programs have limited effect in labor repressive regimes (Anner 2017).

In contrast to other stakeholders, trade unions are "once and the same time internal stakeholders . . . and external stakeholders" (Harvey et al. 2017: 45). Despite their role in CSR policies in coordinated market economies, as in the Nordic countries and Germany, the role of unions and work councils have been almost ignored (Gold et al. 2020; Scholz and Vitols 2019: 237). However, in many European countries, workers are represented on company boards, and unions can therefore potentially influence companies' CSR policies.

In Norway, employees were given the right to be represented on corporative boards by a 1972 amendment of the Companies Act (Heiret 2012: 52). In 1980, the principle of *bedriftsdemokrati* (corporate democracy) was included in the Norwegian Constitution. As a result of the increasing internationalization of Norwegian corporations in the 1990s and 2000s, the Norwegian confederation of trade unions (LO-Norway; Landsorganisasjonen i Norge) set up a network for union representatives at the corporate level (*konserntillitsvalgte*), and published a book that aims to give Norwegian union representatives in multinational companies some tools to handle CSR in their own corporations (Granden 2009).

In the German context, workers' representation on boards is referred to as "shared governance" or "codetermination" (Jäger et al. 2019). Robert Schols and Sigurt Vitols found that in Germany, union representation on boards positively aligns with substantive CSR, like "emissions reduction, the publication of a CSR report and commitment to employment security," but not with symbolic CSR, like being a signatory to the UN Global Compact (Scholz and Vitols 2019: 244). Scholz and Vitols do not look specifically at how codetermination affects how the companies relate to labor abroad. However, Zajak and her co-authors, argue that the involvement of international labor rights organizations "[aiming at] strengthening local trade unions can produce detrimental effects by disempowering more radical and independent unions," thereby delegitimizing radical strategies (Zajak et al. 2017: 908,911). Camilla Houeland describes radical unions as unions that see "their role as part of a larger class alliance in conflict with the state and capitalist system," while reformist unions "emphasise social dialogue mechanisms" (Houeland 2018: 106). Some have argued that in coordinated market economies (like the Nordic countries and Germany) partnership and social dialogue may work, but that it would be far more problematic in liberal market economies (Gold et al. 2020).

In this article, I explore the process whereby a Norwegian union branch acted as a mediator in the process of establishment of a union branch in Tanzania. In a recent edited volume on Travelling Models in global processes, Andrea Behrends, Sung-Joon Park, and Richard Rottenburg emphasize that rationalities are "embedded in particular epistemic communities as well as in institutional and material networks and are inseparable parts of these multilayered networks, which generated them," but it is only the "objectified model" that travels, the rest stays behind (Behrends et al. 2014: 2).

Tanzanians have ample experience with traveling models. By 2012, Tanzania was the country in sub-Saharan Africa that had historically received the second largest amount of aid, surpassed only by Ethiopia (Tripp 2012). As Behrends and her co-authors point out, and which I have demonstrated in an earlier work on Tanzania (Lange 2008), models often come "to be used in ways other than intended" (Behrends et al. 2014: 5). Traveling models, particularly those sponsored by aid agencies, rest on a Eurocentric assumption. Simply put, "the West knows best" (Sabaratnam 2017: 22). Meera Sabaratnam argues that the call for labor rights in international CSR discourse is "based on a particular conception of state-led social democracy akin to the practices in post-war Western Europe" (2017: 33). This is true for the processes that I describe in the coming sections.

Equinor: Background and the relationship to labor

Statoil was established by the Parliament as a national oil company (NOC) in 1972. Statoil has been described as the Labor Party's (*Arbeiderpartiet*) "baby" and has held a central place in Norwegian politics since the early 1900s with close ties to the labor movement. In the early years of Statoil, both the CEO and the chairman of the board were labor politicians (Sæther 2017: 23, 313).

While many other countries started reducing state ownership during the 1980s, this did not happen in Norway (Knudsen, Rajak, et al. this issue). Statoil remained entirely state owned up to 2001, when parliament approved the privatization of a third of the shares (Sæther 2017: 293). Around the same time, Statoil stopped using the term "corporate social responsibility." CSR was replaced with the term "sustainability." This move was part of an international business trend. Hevina Dashwood has documented how large mining companies in the late 1990s "began to frame their CSR policies in terms of the global norm of sustainable development" (2012). As Knudsen, Rajak, et al. make clear, the language shift "toward 'sustainability' and 'environmental and social governance'" was also prompted by the fact that to "many critics and practitioners alike, CSR retained too much of the philanthropic tradition it was meant to replace" (Knudsen, Rajak, et al. thus issue).

In May 2018, Statoil changed its name to Equinor. According to the company, "Equi" refers to "equal" and "equality" and is linked to the company's Norwegian heritage (Equinor 2018a). Equinor currently has operations in more than 30 countries, and production in approximately 12, including Angola, Brazil, and Nigeria (Equinor 2018b). Equinor publishes annual Sustainability Reports that cover environmental concerns, gender balance among its staff, its "social investment projects" in host countries, and human rights—including labor rights—for its own employees as well as those in the supply chain (Equinor 2020a).

Equinor's labor relations with their employees abroad are regulated by a number of framework agreements. The Industri Energi representative on the Equinor board argues that the company is "genuinely concerned about having strong guidelines. It is a trademark, a reputation brand (*omdømmemerke*), even if we are not so big." In the late 1990s, Equinor was among the first companies in the world to have a Global Framework Agreement (GFA) with what is now the global federation IndustriAll[3] (ILO 2009: 70). According to one of my interlocutors in the Equinor branch of Industri Energi, other oil and gas companies, like Shell and Esso, "are totally against such agreements—they are allergic to it." The agreement has been renewed a number of times and states that respect for human rights includes the "right of every employee to be represented by a union of his or her choice and the basic trade union rights as defined by ILO convention 87 and 98" (Industri Energi/IndustriAll Global Union and Statoil 2012).

The former leader of the Industri Energi union holds that the agreement "is worth gold," since it enables the union to force Equinor "to meet the unions wherever they are." The present leader of the Industri Energi union, who has also been the employee representative in the Statoil board for two periods, gives the Statoil leadership credit for the GFA with IndustryAll: "We had people in the Statoil leadership who saw that we would internationalize. They saw that if we were to be able to succeed with the Norwegian model, to bring it with us abroad, we needed that (framework agreement)." She emphasizes health, environment, and safety (HES) and because Equinor is state owned, it therefore has a particular responsibility: "When Statoil was to go abroad on behalf of the state, we needed help to get things in order." While she emphasizes HES, when asked what she means when she refers to the Norwegian model, she answers:

> A model similar to the one that we have here: to have dialogue, not conflict only . . . . It means to have a meeting place to address challenges within a set framework. Not all cultures have that—a place where you can meet the management face to face. In many places there are 2–3 levels between the employees and the top management. We want to have the kind of dialogue that we have found so useful here at home. The culture varies—some places they say: Wow, are they actually *talking* with the management? We have a meeting point, a place for discussion, a place to have a dialogue. And we believe that this gives the best results.

Her language reflects a common understanding of industrial relations in Norway: the focus on dialogue, negotiation, mutual recognition, cooperation, and compromise (Ihlen and Hoivik 2013; Knudsen, Rajak, et al. this issue). However, this understanding of the Norwegian model is problematic in two ways, particularly when it is used to argue for a transfer of the model to other countries. First, the emphasis on dialogue and cooperation between managers and employees is presented isolated from its historical background—the labor conflicts in the interwar period (Ihlen and Hoivik 2013; Knudsen, Rajak, et al. this issue). Second, and related to the first point, by isolating the employer–employee relationship from the other characteristics of the model that academics see as central (Ervasti et al. 2008; Løken and Barbosa 2008), the role of the state is ignored.

At the human resources department (called the Corporate People and Leadership Department),[4] I was told that "interaction and cooperation with the employees is part of our leadership culture," but that they follow the labor regulations in the countries where they operate. Currently, among the countries in the Global South where Equinor operates, salaries are only negotiated through unions in Brazil and Nigeria. However, the Norwegian union Industri Energi is not involved in either of these two countries. In the case of Brazil, most unions are progressive and militant (Houeland 2018) and reportedly do not trust the companies or the authorities. According to the union board member, "in Brazil the kind of cooperation that they have had in Tanzania would not have been possible." In 2017, a Brazilian union leader heavily criticized Equinor in a public hearing for referring to its social democratic traditions when securing licenses, only later to behave like any other oil company and earn money on people's misery (Borchrevink 2019: 380).

In the case of Nigeria, where oil workers' unions have played a critical role in the struggle for democracy (Houeland 2018), there has been no cooperation with Norwegian unions. My interlocutors in the Industri Energi union say that Equinor (then Statoil) branch representatives traveled to meet the employees in the late 1990s, but they did not succeed in establishing a platform for cooperation. Since then, there has been very limited collaboration with Industri Energi. A study of union work among oil workers in Nigeria found that they had no knowledge of the GFA between Statoil and IndustriAll: "Nigerian shop steward at Statoil Nigeria was not acquainted with the agreements that were supposed to benefit him and his members" (Houeland 2017: 65).

According to the leader of Industri Energi, some foreign unions see Norwegian union leaders and union representatives as collaborators and untrustworthy, since they not only emphasize social dialogue but also are paid by the company to fulfill their role. He gave two examples. In Angola, union leaders claimed that the Norwegian union leaders were corrupt, since their air tickets were paid for by Equinor (then Statoil) and therefore refused to meet them. In the United States, union leaders are very skeptical of close collaboration with the employers and have similarly been reluctant to collaborate with Industri Energi.

In Tanzania, where Statoil/Equinor opened a local office in 2007, union density is low and there is little trust in unions. One reason is that the Trade Union Congress of Tanzania (TUCTA) has a poor history in terms of accountability. In both 2009 and 2019, the secretary generals were suspended, accused of embezzlement (Babeiya 2011: 128; *The Guardian* 2019). However, there is a long history of aid to Tanzania and Norway has historically been one of the main development partners meaning that many Tanzanians associate Norway with aid. "Partnership" both between governmental bodies and between civil society organizations in the South and North, and "capacity building" have been central to development cooperation. This history partly explains why the Industri Energi Equinor branch has been met with open arms by the employees in Tanzania.

Equinor in Tanzania

Equinor has been in Tanzania since 2007 and has invested more than 2.1 billion USD in the country (Equinor 2020b). In 2012 and 2013, the company made enormous gas discoveries in the deep sea—the largest abroad in the company's history. The company plans to build a liquefied natural gas (LNG) plant onshore but has not yet taken the final investment decision. The delay in the decision is partly because of changes in Tanzania's regulatory framework, including the passing of the Sovereignty Act in 2017, which says that the parliament can ask to have contracts renegotiated without international arbitration (Sørreime 2019: 559). As of 2020, Equinor Tanzania only has 30 employees, but in 2014 the management envisaged having at least a thousand employees within a few years and the company invested heavily to build up a union branch at its office.

Unions in Tanzania

In common with Vietnam and post-socialist countries in Eastern Europe, the labor regime in Tanzania has changed dramatically over the past 50 years. Unions played a central role in the struggle for independence, but during the one-party era (1977–1992) all unions were coopted by the ruling party Chama Cha Mapinduzi (CCM; Party of the Revolution). The Trade Union Act no. 10 of 1998 formally made trade unions independent of the government, and many independent unions have been formed. At the same time, Tanzania opened up for foreign investments in the mining sector (Lange 2011). In 2007, at least a thousand workers, some of them trade union leaders, were reportedly fired from a mining company after striking in protest against the wage differences between foreigners and Tanzanians (Rugeiyamu et al. 2018). However, the state has also suppressed workers' rights. In both 2010 and 2015, civil servants organized under The Trade Union Congress of Tanzania (TUCTA) were told by the president that they would lose their jobs if they engaged in strikes (Rugeiyamu et al. 2018: 46). Labor rights are not mentioned in Tanzania's guidelines for CSR in the extractive industry (URT 2015). This is in contrast to Ghana's Mineral Commission's guideline for CSR, which included workplace and labor standards (Jiao 2019: 47).

Despite playing key roles in other African countries, such as Nigeria (Atabaki et al. 2018; Houeland 2018), South Africa (Webster 2018), and Zambia (Larmer 2006), unions have not played a significant political role in Tanzania after the late 1970s. There is lack of "solidarity and partnership" among the country's trade unions and opposition parties and trade unions blame each other for the lack of interest and unwillingness to cooperate (Babeiya 2011: 127, 128). In the following section, I describe the major events during the process of unionization of the local Equinor staff in Tanzania.

Equinor's and Industri Energi's support to NUMET

In 2013, the newly established National Union of Mine and Energy Workers of Tanzania (NUMET), a splinter from Tanzania Mines, Energy, Construction and Allied Workers Union (TAMICO), contacted the management of a number of mining and petroleum companies in Tanzania and asked for a meeting with the local staff. They referred to a provision in Tanzanian law called *Notification to exercise organizational rights*. There were varying responses to the meeting proposal from different companies: British Gas welcomed a meeting, but no members joined; the management of ExxonMobil never responded; Williamson Diamond mine welcomed a meeting, but only after a full year of discussion. Statoil/Equinor, on the other hand, responded quickly and positively.

The Equinor management organized a meeting where NUMET representatives presented themselves to the local staff and encouraged them to join the union, but the response from Equinor employees was lukewarm. Of the twelve Tanzanian staff members I have talked to, only one had been a member of a union before. The employees referred to the history of unions in the country and the misuse of members' money as reasons for why they were not interested in joining a union.

In spring 2014, the Equinor board visited Tanzania. The Norwegian union representatives asked local staff whether they were unionized. The answer was no, but they were interested to learn from their Norwegian colleagues. One of the union board members recalls the kind of advice she gave to the Tanzanian staff: "They wanted advice and tips, and they knew little about the Norwegian culture, how we are organized. . . . They had no experience with unions, but we explained to them: 'Make a meeting place with the management, and don't address the most difficult issues first.'"

After witnessing the role the Norwegian union representatives played in the Equinor board, some of the Tanzanian staff contacted NUMET and asked for a new meeting. The new meeting took place in August 2014 and 23 of the 26 employees in attendance joined the trade union, and branch leadership was elected. In December 2014, a recognition agreement with Equinor was signed, but during the wage negotiation the parties held vastly different views.

When I discussed the first wage negotiation with the Norwegian members of the Statoil Tanzania management, they smiled in disbelief and described it as a "catastrophe." The union demanded a 150 percent wage increase, but ended up with just 3 percent. The local understanding and reception (Behrends et al. 2014) of the wage negotiation model was substantially different from the Norwegian original, where, at least over the last twenty years, a demand for a 150 percent wage increase would be unheard of. One does get the impression however, that the management did not take into account that in Norway, wage negotiations are part of the "income-political settlements" (*inntektspolitiske oppgjør*) where the deals include "not only salaries but also comprehensive adjustments of the welfare system, pensions" and more (Knudsen, Rajak, et al. this issue).

In Tanzania, there is a very limited welfare system and public services are generally of poor quality. In interviews, branch union leadership explained that they were very content with the medical insurance that Equinor offered, but that they felt that the Norwegian management did not fully understand the economic burden of private education in the country. One of the other foreign investors in the country, in their negotiations with a rival union, has agreed to support school fees for the employees' children as part of the wage package. The fact that unions may lobby for benefits other than wages is not unique for Tanzania. In Brazil, the union organizing the workers at Hydro similarly asked for economic support for education and housing (Christensen 2011).

One reason why such support is far more attractive in Tanzania than a general pay raise is expectations from the extended family. It may be hard for a worker to send his/her children to a good, private school, and not do the same for one's nephews or nieces whose parents are less fortunate. When school fees are covered directly by the company, the employees escape such moral dilemmas. At the same time, companies that enter such agreements do to some extent take over the role of state, and thereby increase their influence and power in the societies where they operate (Ferguson 2005; Rajak 2016). In interviews, the Equinor management was very clear that their role as a company in Tanzania should not be confused with aid or replacing government authorities.

However, since both the managers of Equinor and the Norwegian union representatives appear to conceptualize the Norwegian model as close collaboration between the company management and one, strong union that represents the workers—and not as a tripartite system where the state plays an important role, including in offering universal welfare—they fail to fully understand the requests and demands from union members in Tanzania.

After the first wage negotiation between Equinor Tanzania and the NUMET branch, the management decided that it was important to increase Tanzanian staff's knowledge of industrial relations in Norway. As one of the Norwegian based Corporate People and Leadership (PL) staff members diplomatically put it: "They had a bit different way of working, that's why they were invited here." Equinor Tanzania asked Industri Energi to act as a mediator of the traveling model, and invited the four members of the branch leadership, together with Equinor's human resources (HR) manager in Tanzania to Norway for a weeks-long visit in September 2015. The trip was paid for by Equinor but organized in cooperation with Industri Energi who said that they all "agreed that there was a need to build a culture of cooperation." Industry Energi's support to the NUMET branch was funded by the union's international solidarity fund.

During the visit, the NUMET Equinor branch leadership held meetings with the branch leadership at Equinor. The PowerPoint presentation was titled "Tanzania Visiting Statoil: Union Meeting, Discussion and Capacity Building," reflecting the perception that a transfer of knowledge from Norway to Tanzania was central to the process. To many Tanzanians, this is a well-known format. Through decades of development cooperation, civil society organizations and government entities from the Global North have offered countless capacity-building programs and seminars to Tanzanian institutions, organizations, and individuals, and as Behrends et al. have pointed out, those who support or sponsor a traveling model often advocate for "responsible" handling of the traveling model (2014: 33).

The union offering this specific capacity-building seminar was a member of the Norwegian confederation of trade unions (LO-Norway). Some years earlier, LO-Norway was funded by Norwegian aid money to carry out a project that aimed to share experiences with democratic decision-making processes through the Oil for Development program. Therefore, they had experience with such forms of capacity building (Løken 2014). The main themes presented included the tripartite collaboration model, the Industrial Democracy law of 1973 that gives "the employees representation in company steering bodies," membership and organization of the union, and the Global Framework Agreement of 1998 (Industri Energi Statoil 2015).

The guests were also invited to the headquarters of Industri Energi and TEKNA (a union for civil engineers) and had meetings with Equinor's safety representatives, and the employers' representative, the Confederation of Norwegian Enterprise (Næringslivets Hovedorganisasjon, NHO). They also had a dinner with the staff representative on the Equinor board. According to the PL representative, "they gained a better understanding of the fact that this is interaction (*samhandling*)."

Having invested in building knowledge and understanding among the branch leadership, the Equinor Tanzania management decided it was time to initiate a closer relationship with NUMETs central office. Therefore, in November 2015 a delegation of ten persons from Equinor Tanzania, including the Norwegian Country Manager and the Norwegian HR manager, traveled by plane to Mwanza (1,110 kilometers from Dar es Salaam) to meet with the NUMET national leadership, which is based in the country's main mining area. The little splinter organization had never experienced anything similar. The great majority of their members work at large-scale mines owned by multinational corporations and have previously experienced companies attempting to crush them.

Foreign companies use both carrots and sticks to crush unions in Tanzania. An expat manager of a mining/drilling company shared his strategies for keeping membership in NUMET at a minimum. He explained that NUMET had managed to get 40 percent of his workers to join the union at the beginning of 2017. Under Tanzanian law the unions have the right to collective bargaining when they have 50 percent membership. He started efforts to reduce union activities: "I organize English language training for my local staff," he said, and added: "Doing small things like that keeps them away from the union." In addition to free language training, he offered them a good pay raise and told the workers that they could not hold union meetings on work premises. He succeeded in getting the membership rate down to zero by the end of the year. Winding up his success story, he concluded triumphantly: "I got rid of them!"

In light of such experiences, Equinor's visit was a very special event for the NUMET leadership. In the words of one of the Norwegians: "To them, it was like having the king visit!" NUMET decided to make the most of this unusual visit and invited four television broadcasters, and five newspapers to report on the visit. They also hired a professional filmmaker to record the events—the resulting film is similar to the usual genre the company produces: wedding videos. Accompanied by romantic music, we see the NUMET and Equinor staff visiting one of the few tourist attractions in the city, a small island in Lake Victoria with a zoo. We later see them in more "corporate" surroundings, in the meeting room inside the hotel.

In all countries, but particularly in one of the world's poorest countries, prospective union members may be attracted to the union that appears to have good alliances and support from abroad. This explains why it was so important for NUMET to showcase their cooperation with Equinor as broadly as possible in the media and to have a professional videographer document the event. As a splinter union, NUMET competes with the much stronger Tanzania Mines, Energy, Construction and Allied Workers' Union (TAMICO). TAMICO is a member of the federation TUCTA, which is aligned with the ruling party. LO-Norway and Industri Energi have supported TUCTA through the Norwegian aid program, Oil for Development (OfU; Olje for Utvikling).[5] This is an example of how support from international NGOs or global unions empower some organizations, and thus indirectly disempower other groups (Zajak et al. 2017: 908), in this case independent unions like NUMET.

According to the former HR manager at Equinor Tanzania, the visit to NUMET's headquarters was a strategic decision by Equinor. At that point, the management envisaged that Equinor Tanzania would grow to encompass a thousand employees within a relatively short time. "We leaned on the same experience and philosophy as in Norway," he explained. An Equinor union representative based in Norway, who met the NUMET representatives during their visit to Norway, similarly emphasized the Norwegian experiences as a central factor for their work with unions abroad: "In the early years of the oil industry in Norway, there were many in-house unions (*husforeninger*), and they went on strike heedlessly." She explained how Hydro (established in 1905) had experience with industrial workers for more than a hundred years, and therefore avoided such in-house unions: "Things were tidy and orderly . . . this is what we envisage down there as well—it so much better to have *one* union only—so we tried to follow the Norwegian model." Again, we see how some actors refer to the close collaboration between industry management and trade unions as "the Norwegian model," and appear to disregard the more common, wide conceptualizations of the Nordic/Norwegian model that see the state as central (Ervasti et al. 2008; Løken and Barbosa 2008). The union representative also associates "the Norwegian model" with having one trade union representing the employees. In actual fact, there are two unions organizing oil workers in Norway. Industri Energi's competitor, SAFE, was originally named OFS and was set up by Phillips as a company union in an attempt to keep out the unions affiliated with LO-Norway. However, through a number of strikes between 1978 and 1981, OFS became radicalized (Ryggvik 2012), and this union does not nurture the close collaboration with Equinor that Industri Energi does.

For Equinor Tanzania, which envisaged having thousands of employees, the prospect of collaborating with one union rather than a number of smaller ones was attractive. An additional factor that may have spurred Equinor Tanzania to make efforts to establish a good relationship with NUMET is that MNCs have a bad reputation regarding labor relations in Tanzania. Sarag Lauwo and Olatunde Julius Otusanya note that foreign companies' abuse of workers' rights has attracted "considerable criticism from NGOs, trade unions and the media" (2014: 96, 101). Equinor Tanzania's management are very conscious that negative news about Equinor in Tanzanian media would reach Norwegian headlines very quickly, particularly given the close relationship between the two countries after 50 years of development cooperation.

It has been argued that MNCs are less monitored in the Global South than in the North or their home countries. However, due to substantial donor funding of NGOs since the late 1980s, Tanzania is a country with a relatively strong civil society (disregarding the weak trade unions). When the contracts that Equinor and ExxonMobil had signed with the government in 2007 were leaked in 2014, there was a media debate where several influential people requested that the contracts be reviewed (Borchrevink 2019; Sørreime 2019: 559). In the event that Equinor invest in Tanzania and have thousands of employees, a serious labor conflict would probably be addressed by Tanzanian civil society organizations (CSOs) and Tanzanian media, in a similar manner to the local coverage of labor conflicts within the mining sector. Equinor's investment in the union branch must be seen in this context as well.

There have been serious conflicts within the NUMET branch at Equinor Tanzania. Many of the members felt that the union leadership was too conflict oriented, "fighting with the management." In February 2016, the branch leadership was overthrown by the members. Tanzanian staff members praise the new branch leader as being "cooperative" and "calm" (*mpole*) and collaborating well with the management, rather than fighting them. The majority of branch members were in favor of dialogue rather than a combative stance, and thus embraced a reformist style of unionism.

News of the conflict reached the Industri Energi Equinor branch, which asked for an update on behalf of the International Affairs section of the Federal Union (LO-Norway).[6] The new NUMET leadership put together a brief report where they introduced themselves and their backgrounds, and also stated that only ten of 22 local staff were members, which meant that they did not qualify for a collective bargaining agreement under Tanzanian law. The report from the NUMET branch to their partners in Industri Energi from August 2016 lists six priority areas of the branch: "Ensure good cooperation at all times with DPI TAN in supporting TGP; competence development using Statoil experience working with the unions; continue to build skills in union management within Statoil environment; establish cooperation with Statoil corporate union leadership; continue promoting better employer/employee relations;

continue promoting/initiating cultural bridging programs" (NUMET 2016). The first item on the list is to ensure "good cooperation at all times with DPI TAN [Development and Production International Tanzania] in supporting TGP [Tanzania Gas Project]." The very first item on the list of priorities of the local union branch, then, is to ensure good cooperation with the management.

The Equinor management and employees in Tanzania have, to a large degree, adopted a model of close collaboration between management and the union branch. The collaboration model fits well with the national ethos in Tanzania that emphasizes living together in peace in a context of great cultural diversity, and which cherishes the ability to cooperate well across ethnic and religious lines. At the same time, the union branch is still far from its original goal of a collective bargaining agreement. The branch leadership told me that the motivation for union work had subsided as a consequence of the conflict between the former branch leaders and the branch members.

The HR manager at Equinor Tanzania also admitted that the company's engagement for getting the staff unionized had been reduced now that the investment in Tanzania was less certain. As he put it, "there is no longer a business case" for securing the long-term rights of the employees. The Oslo-based Norwegian PL leader, who works closely with the Tanzanian HR leader in the same leadership group, argued along the same lines: Equinor will commit itself as little as possible as long as the final investment decision has not been taken. These statements demonstrate that although Equinor has committed itself to international agreements, and although many Norwegian employees talk of exporting what they refer to as the "Norwegian model," there is a limit to the commitments that Equinor Tanzania is willing to make.

In the small and simple offices that house the NUMET headquarters in Mwanza, enlarged gold framed photos of the visit by the Equinor delegation hold a prominent place. In an interview, the General Secretary admitted that the union has not achieved very much in their collaboration with Equinor, but emphasized the need to balance: "There are so many trade unions; if you frustrate the employer, they can call any other trade union." His statement clearly illustrates the unequal power relationship between corporations and unions in Tanzania, and his experience that it is often the company that determines which union the employees are members of.

NUMET's General Secretary started NUMET as a splinter union after having lived and worked in South Africa and being inspired by union work there. In his youth, he went to a Tanzanian school that received Norwegian aid funds, and his perception is that Equinor, as a Norwegian company, is different from other MNCs. He stresses that unions in other countries have "contributed to improving performance and benefits to the employees *and* the investors," and that ideally, unions and companies should be "business partners." The statement that unions are "business partners" to the employers is similar to the reformist or social democratic thinking that Industri Energi and Equinor represent.

NUMET's General Secretary's statement about being "business partners" stands in clear contrast to NUMET's web presentation where NUMET presents itself as a radical union: "The history of the National Union of Mine and Energy Workers of Tanzania (NUMET) is a history of class struggle. This struggle is embedded in the inherent contradictions that exist between capital and labor but also the struggle against colonialism" (NUMET 2020).

In their ethnographic studies of labor politics in Kazakhstan and India, Eeva Kesküla and Andrew Sanchez found that union leaders tend to make "emotive appeals to languages of struggle that they are usually unable to fulfil in their daily activities" (2019: 112). In the case of NUMET, this gap between ideal and practice may be the pragmatic compromise of a poor and marginalized union that receives economic support from some of the larger corporations (including Equinor), but does not have any ties to the national federation TUCTA. Together with other splinter/independent unions, NUMET is trying to establish a new federation, Tanzania Federation of Free Trade Unions, as an alternative to TUCTA. However, at the time of writing, the only formal ties "upward" that the NUMET Equinor branch has is to NUMET centrally (Mwanza). There are no formal links to a national federation, nor to the global federation, IndustryAll.

In principle, the ILO and the Norwegian federation are strong supporters of a unified labor movement and disapprove of new independent unions or splinter unions. In practice however, the Norwegian federation, through their member unions, cooperates with independent or splinter unions in both Tanzania and Brazil.

The NUMET branch's ties to the Equinor branch of Industri Energi (Oslo) are informal, and there is no Global Work Council for Equinor. Within the EU, the law mandates European Works Councils, which enable employees to contribute to the "decision-making process in transnational issues" (ILO 2009: 770). Inspired by the role of European Works Councils, three initiatives have been taken to establish a Global Works Council for Equinor. First, LO-Norway has requested Norad (the Norwegian aid agency) to provide pilot funds to start a Global Works Council for Equinor staff in the different countries where the company has operations. A motivation for spending aid money on this was the fact that Equinor has operations in several developing countries, but the initiative was not granted support.[7] Second, Industri Energi has sought to integrate the idea of a Global Work Council in their Global Framework Agreement (GFA) with Equinor, but Equinor has refused to do so. Third, the three union representatives of the Equinor board have raised the issue of a Global Work Council in board meetings, but have not succeeded in getting support for this initiative.

Internationalization of employment tends to fragment worker representation. As Robert Scholz and Sigurt Vitols have pointed out, the "lower the proportion of employees in the 'home' country of a multinational, the more difficult it is to organize workers' voice, given the diversity of national industrial relations" (Scholz and Vitols 2019: 236). A Global Work Council for Equinor employees would have given the Tanzanian representatives a platform for learning from unions that are more similar to themselves than Industri Energi, and it would have given them a very different form of bargaining power across borders. However, the company was very resistant to this idea, and therefore the union representatives no longer see it as a realistic goal. This indicates that although Equinor has signed a Global Framework Agreement with IndustriAll, there are clear limits to how far the corporation is willing to go in terms of cooperation with unions in their global operations.

This is possibly related to Equinor's assessment of risk, where "labor strikes" are listed among the operational risks that the company may face.[8] In Nigeria in 2012, oil workers forced the government to withdraw planned cuts in subsidies by threatening to strike (Houeland 2018). In Norway, there were a number of strikes in the oil sector in the 1970s and 1980s, including a shutdown of production. In 2012, when Equinor (then Statoil) wanted to remove the option of voluntary retirement at the age of 62 with a very attractive pension, more than seven hundred oil workers went on strike. Approximately two weeks later, the employers announced that they would organize a lockout of union members, but the government decided to force the parties to compulsory arbitration. The ILO was very critical of this (IndustriAll 2012). This case illustrates how the Nordic/Norwegian tripartite system enables the state to intervene in labor conflicts that are perceived to threaten broader societal interests. It also shows that presenting "the Norwegian model" as a question of cooperation and dialogue between corporations and trade unions—as many of the Norwegian Equinor staff and union representatives did when talking of a transfer of the model to Tanzania—represents a very narrow understanding, since it omits the role of the state, which is central to how the tripartite system functions in

Norway (Ervasti et al. 2008; Løken and Barbosa 2008).

Equinor Tanzania currently has only twenty local employees, all of them office workers, and union work is not high on the agenda. If Equinor decides to invest in Tanzania however, and starts production, it will be an advantage for the company to have a union branch in place that sees cooperation with the management as central to its mandate.

Conclusion

This article has demonstrated the way the Norwegian energy company Equinor actively supported the establishment of a union branch at its office in Tanzania. During this process, close cooperation and dialogue between company management and union branches (and upward to unions and federations) was referred to as "the Norwegian model." The case study is yet another example of "traveling rationality," where a social mode is transferred from one context to another, but where only the "objectified model" travels (Behrends et al. 2014: 2; Craig and Porter 2006).

Norwegian union representatives at federal and company levels, as well as representatives for Equinor HR, talk warmly of "the Norwegian model" and how beneficial it is for both the company and its employees. The "objectified model" they refer to emphasizes trust and cooperation between employers and employees, while the scholarly and political conceptions of the Nordic/Norwegian model—which focus on the central role of the state in this cooperation through the "income-political settlements" (*inntektspolitiske oppgjør*) and the state's role in securing universal welfare—are undercommunicated.

To the Tanzanian staff, the idea of capacity building and learning from Norway was a well-known scenario. It was also attractive, first because they hoped that unionization would secure them substantially higher wages and possibly other benefits like support for education for their children, but also because the trips to Norway were attractive on both economic and social terms.

Within Industri Energi and the Norwegian section of the MNC, the view that cooperation is beneficial to both workers and the corporation is hegemonic. I argue that through their support for union work in Tanzania, Equinor, in close collaboration with Industri Energi, has managed to transfer this norm quite successfully. After some turmoil, the local union branch states that their main priority is "good cooperation at all times" with the management. Trade unions do discipline workers (Houeland 2018), and I argue that up to now, the company appears to have benefited from their support for the establishment of a local union branch. To what degree the unionized workers have benefited is an open question. The members have not succeeded in their goal of having a collective bargaining agreement, and a system of social dialogue that includes the Tanzanian state is not realistic because the union that the Tanzanian staff are members of, NUMET, is a split union that has no ties upward.

That being said, the oil sector is generally characterized by contractors and contingent work (Atabaki et al. 2018), and the present and future employees of Equinor Tanzania are in a better position being organized than not. Equinor's willingness and efforts to support the establishment of a union branch in Tanzania is laudable, but as I have shown, it is closely connected to Norwegian corporate democracy and Equinor's close ties with Industri Energi, to which it is accountable. A pivotal point in the process was the Equinor board's visit to Tanzania, where the union representatives contacted the Tanzanian staff. Without this visit, the local staff of Equinor Tanzania might have remained unorganized. Equinor's support for unionization was probably a result of several factors, including Equinor's CSR policies, which include labor rights, an assessment that unionization of its Tanzanian staff would be beneficial for the company, as well as codetermination and the company's accountability to the Norwegian union Industri Energi. This case demonstrates that a Norwegian MNC may do things quite differently from other MNCs. However, the degree to which this happens is partly contingent on coincidences—like where the board happens to pay a visit at a specific time, and local characteristics like whether the local union culture is reformist, emphasizing social dialogue, as in Norway, or radical, and therefore rejecting the "Norwegian way."

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Notes

1. Some of the interviews were recorded (with consent), but for the great majority I took handwritten notes and the quotes may therefore not be verbatim in the strict sense.
2. The union has 60,000 members and has a history of negotiating very good conditions for its members working off-shore.
3. IndustriAll Global Union. 2018. http://www.industriall-union.org/ (accessed 25 July 2020).
4. For Equinor's organisation chart, see https://www.equinor.com/en/about-us/organisation.html.
5. Norad, Oil for Development Programme. 12 September 2017. https://norad.no/en/front/thematic-areas/oil-for-development/oil-for-development-programme/. Industri Energi discontinued cooperation with TUCTA after a few years because they experienced the Federation to be extremely inefficient and marred by power struggles.
6. Email correspondence made available to the author.
7. Camilla Houeland, personal communication, 13 March 2020.
8. Ståle Knudsen, personal communication, 12 March 2019.

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