— Chapter 8 —

Exporting the Norwegian Model through the "Capacity Building" of a Local Union Branch

The Case of Equinor in Tanzania

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This chapter focuses on the case of Equinor, a multinational corporation (MNC) that originated as a Norwegian national oil company, and their efforts in collaboration with a Norwegian union to support union work among its employees in Tanzania. These efforts were inspired by the Nordic tradition of social dialogue between corporations and strong, independent unions. Corporate 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 in the tripartite system. The tripartite system can be described as the formalized and strictly regulated interaction between corporations, trade unions, and the government. As seen in the introduction to this book, 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" (see also Knudsen et al. 2020). This is a result of specific economic and political developments that took place in the interwar period.

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 (2008: 13) have identified six characteristics that are often emphasized when the Nordic or Norwegian model is described: "[1] universal welfare arrangements and a large public sector; [2] high employment, among both men and women; [3] small wage differences and a large degree of social mobility; [4] strong collective actors—both centrally coordinated wage formation and local bargaining at company level; [5] close cooperation between the government, employers' associations, and trade unions; and [6] strong codetermination and participation at the company level."

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, Preuss, and Gold 2014: 12). The relationship between Equinor and the Norwegian union where the majority of the employees are organized, Industri Energi, is very close, and the Union branch in Equinor Norway has a more influential role than is commonly found in MNCs; for example, the union is represented on the board. In this chapter, I explore the process whereby the Norwegian union branch acted as a mediator in the process of establishment of a union branch in Tanzania. 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. Corporation managers and union representatives tend to 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.

There is considerable diversity in trade unionism, both within and between countries (Harvey, Hodder, and Brammer 2017: 45; Tran, Bair, and Werner 2017). It is therefore important to understand labor struggles and unions "within their political and historical context" (Neve 2008: 214). Whereas radical unions see "their role as part of a larger class alliance in conflict with the state and capitalist system," reformist unions "emphasise social dialogue mechanisms" (Houeland 2018: 106). 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 how a radical and confrontational union leadership was replaced by a union leadership that adopted the idea of close collaboration with the management.

The chapter 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). My research interests were twofold. As seen in chapter 7, I was interested in the gendered dimensions of Equinor's CSR and found that despite Equinor's profile as a company that is concerned with gender equality, the main beneficiaries of the projects at the local level are men. In terms of labor relations, which is the focus of this chapter, 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).

I visited Equinor offices in Norway and Tanzania, union headquarters, 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 keep 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. Since I did multisited ethnography, I did not attempt to carry out participant observation with Norwegian or Tanzanian unions. Thus, I have limited ethnography of the day-to-day work within the corporation and the unions. 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 chapter.

The chapter is organized as follows: The first part comprises a literature review of transnational labor activism and background information about Equinor and its relationship to labor. The second part presents Equinor Tanzania and background information about trade unions in Tanzania. The third part describes in depth the process of building up a local union branch at Equinor Tanzania using a "traveling model," the transformation that the branch went through, and how the "business case" for supporting union work gradually lost momentum. Finally, I show how the efforts to establish a Global Work Council have stalled, demonstrating that there is a clear limit to Equinor's willingness to cooperate with labor. In the concluding remarks, I argue that the traveling model that was presented to the Tanzanian staff was an ahistorical version of Norwegian industrial relations. While the model was born through conflict and is closely tied to the tripartite system and the welfare state, the Norwegian union Industri Energi,[2] which organizes most of the "blue-collar" workers in the oil and gas sector in Norway, presents a message to their "partners" in the Global South that close cooperation is a win-win for both parties.

Transnational Labor Activism

Multinational corporations (MNCs) engaged in resource extraction in the Global South have been heavily criticized; one response by the MNCs has been to formulate corporate social responsibility (CSR) strategies (Rajak 2011a; Welker 2009: Gilberthorpe and Rajak 2017). A relatively large body of literature looks at how various stakeholders, including NGOs, pressure companies to adopt specific policies (Gold, Preuss, and Rees 2020: 136; Dolan and Rajak 2011: 2; Spencer 2018; Welker, Partridge, and Hardin 2011), but there has been less focus on the role of trade unions.

In many European countries, workers are represented on company boards, and unions can therefore potentially influence companies' CSR policies and their relationship to labor abroad (Gold et al. 2020; Scholz and Vitols 2019). In Germany, workers' representation on boards is referred to as "shared governance" or "codetermination" (Jäger, Schoefer, and Heining 2019), and one study found that union representation on boards positively aligns with substantive CSR, such as "emissions reduction, the publication of a CSR report and commitment to employment security," but not with symbolic CSR, such as being a signatory to the UN Global Compact (Scholz and Vitols 2019: 244). This study did not look specifically at ways in which codetermination affects how the companies relate to labor abroad.

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*). The confederation also published a book that aims to give Norwegian union representatives in multinational companies some tools to handle CSR in their own corporations (Granden 2009). However, Nordic Union representatives are generally skeptical of the concept of CSR and push for formal global framework agreements (GFAs) rather than voluntary and informal CSR.

In contrast to NGOs, which may spread negative information about companies, many unions in Europe are concerned about protecting jobs and therefore do not wish to undermine corporate reputations (Rees et al. 2014: 12). In order to understand the role of trade unions in relation to labor abroad then, we must acknowledge that they are simultaneously internal and external stakeholders (Harvey et al. 2017: 45). This may explain why a review of the literature on how transnational advocacy networks support domestic struggles found that trade unions are "no longer viewed as a central player" (Zajak, Egels-Zandén, and Piper 2017: 903, 916). The authors also found that, although international labor rights organizations aim at strengthening local trade unions, they sometimes disempower "more radical and independent unions" and thereby delegitimize radical strategies (2017: 908, 911). It has been argued that partnership and social dialogue may work in coordinated market economies, such as the Nordic countries and Germany, but is far more problematic in liberal market economies (Gold et al. 2020). My case study shows that the union branch at Equinor Tanzania initially represented a radical union model but, in the end, adopted the social dialogue model that the union branch at Equinor Norway presented to them. The following sections present the relationship between Equinor and labor in Norway as well as in some of the other countries where Equinor operates.

Equinor: Background and the Relationship to Labor

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 therefore a need to expand the study of MNCs that are engaged in resource extraction to include national oil companies. Statoil was established by the Norwegian Parliament as a national oil company (NOC) in 1972. The national oil company has been described as the Labor Party's (*Arbeiderpartiet*) "baby." In the early years of Statoil, both the CEO and the chairman of the board were labor politicians (Sæther 2017: 23, 313). Although many countries started reducing state ownership during the 1980s, this did not start in Norway until the 1990s (see introduction). Statoil remained entirely state owned until 2001 when parliament approved the privatization of a third of the Equinor shares (Sæther 2017: 293).

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 thirty countries and production in approximately twelve, 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 relations with their employees abroad are regulated by a number of framework agreements. One of the union representatives on the Equinor board argued in an interview 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, such as Shell and Esso, "are totally against such agreements—they are allergic to them." The agreement has been renewed a number of times, and states that it is 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 conventions 87 and 98" (Industri Energi/IndustriAll Global Union and Statoil 2012).

A high-ranking Industri Energi representative explained that the agreement "is worth gold," since it enables the union to force Equinor "to meet the unions wherever they are." Another top-level representative of the Industri Energi union, who had also been the employee representative on the Statoil board for two periods, gave the Statoil leadership credit for the GFA with IndustriAll: "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]." The representative emphasized health, environment, and safety (HES) and argued that, because Equinor is state owned, it has a particular responsibility: "When Statoil was to go abroad on behalf of the state, we needed help to get things in order." While this interlocutor emphasized HES, when asked what the Norwegian model implies, the response was as follows:

> 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 two to three 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.

This language reflects a common understanding of industrial relations in Norway: the focus on dialogue, negotiation, mutual recognition, cooperation, and compromise (Ihlen and Hoivik 2013; see also the introduction in this volume). However, this interpretation 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 as isolated from its historical background—the labor conflicts in the interwar period (Ihlen and Hoivik 2013; see also the introduction in this volume). Second and relatedly, 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.

The human resources department of Equinor[4] told me that "interaction and cooperation with the employees is part of our leadership culture" but that the corporation follows 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. In the case of Brazil, most unions are progressive and militant (Houeland 2018) and reportedly trust neither the companies nor the authorities. According to one of the Norwegian union representatives on the Equinor board, "the kind of cooperation that they have had in Tanzania would not have been possible in Brazil." 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 as any other oil company and earn money on people's misery (Borchgrevink 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 in the late 1990s, union branch representatives traveled to meet the employees, but they failed to establish 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 the union steward at Statoil Nigeria had no knowledge of the GFA between Statoil and Industri-All (Houeland 2017: 65).

According to one of the leaders 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 are also paid by the company to fulfill their role. This interlocutor gave two examples. In Angola, union leaders claimed that the Norwegian union leaders were corrupt since their airline tickets were paid for by Equinor (then Statoil), and therefore the Angolans 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.

Equinor in Tanzania

Equinor has been in Tanzania since 2007 (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 yet to make 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 had twenty employees, but in 2014, the management envisaged having at least one thousand employees within a few years, and the company invested heavily to support a newly established union branch at its office.

Trade Unions in Tanzania: Co-option, Suppression, and Misuse of Money

In common with those in Vietnam and postsocialist countries in Eastern Europe, the labor regime in Tanzania has changed dramatically over the past fifty years. Unions played a central role in the struggle for independence, but during the one-party era (1977–92), all unions were co-opted 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. However, union density is low and there is little trust in unions. 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). In the early 2000s, foreign investment in the country's mining sector boomed (Lange 2011). In 2007, at least a thousand workers, some of them trade union leaders, were reportedly fired from a mining company after striking to protest the wage differences between foreigners and Tanzanians (Rugeiyamu, Kashonda, and Mohamed 2018). However, the state has also suppressed workers' rights. In both 2010 and 2015, civil servants organized under the 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), in contrast to Ghana's Mineral Commission's guideline for CSR, which includes workplace and labor standards (Jiao 2019).

Despite playing key roles in other African countries, such as Nigeria, South Africa, and Zambia (Atabaki, Bini, and Ehsani 2018; Houeland 2018; Webster 2018; Larmer 2006), unions have not played a significant political role in Tanzania since 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).

This context is an important backdrop for understanding why the staff of Equinor Tanzania have changed their stance on unionization on several occasions. In the following sections, I present five main arguments. First, I show that the role that unions have in Norway, as *members of company boards*, can indeed influence a company's labor relations abroad. Following the advice of the board's Norwegian union representative, the Equinor Tanzania staff decided to unionize. Second, I demonstrate that the attempt by the Norwegian union branch to *export their reformist union model* initially failed, since the company management and the Tanzanian workforce had very different expectations as to the outcome of the wage negotiations. This is partly linked to the fact that the Norwegian management and union representatives isolated one aspect — *close collaboration* — from what they referred to as the Norwegian model — and did not acknowledge the central role of the welfare system in Norway for securing the model's success. Third, I demonstrate that, in their efforts to make the Tanzanian branch union leadership adopt the model, Equinor used a system that was well established in Tanzania by donors in development "partnerships": so-called *capacity building*. With time, and most likely linked to the extreme power asymmetries, the union branch in Tanzania gave up their radical stance and adopted a reformist union approach. Fourth, I argue that the Equinor management's attitudes toward unionization is closely linked to what they see as *beneficial for business* at any given point. Lastly, I point to the fact that Equinor has resisted establishing an *international organizational structure* that would facilitate interaction between their employees in different countries. This is the main barrier to the full involvement of unions in the company's operations outside of Norway.

Company Board Membership

In 2014, Equinor Tanzania was seen as a very promising project. The staff was small, consisting of thirty to forty office workers, but the company envisaged having thousands of employees within five years or so. Envisaged to be the corporation's largest investment abroad in history, the board decided to make a visit. The union representatives on the board asked the local staff whether they were unionized. The answer was no, but they were interested to learn from their Norwegian colleagues.

A year before the board's visit, the National Union of Mine and Energy Workers of Tanzania (NUMET) had contacted the Equinor management and asked for a meeting with the local staff. 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. In interviews, 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. However, after the board's visit, some of the Tanzanian staff contacted NUMET and asked for a new meeting.

What made the employees change their minds about unionization? First, witnessing the role the Norwegian union representatives played on the Equinor board made it clear to the Tanzanian staff that unions in Norway held a very different position from unions in Tanzania. Second, there is a long history of aid to Tanzania, and Norway has historically been one of the main development

Figure 8.1. Equinor's office building outside Oslo. The "capacity building" of the NUMET union branch leadership took place partly at the Equinor offices in Oslo, partly at the headquarters of the Norwegian union Industri Energi. The guests from Tanzania also visited the Confederation of Norwegian Enterprise. © Siri Lange.

partners, meaning that many Tanzanians associate Norway with aid. "Partnership," both between governmental bodies and between civil society organizations in the Global South and Global North, and "capacity building" have been central to development cooperation. This history partly explains why the employees in Tanzania were so receptive to the suggestion from the union representative from the Industri Energi Equinor branch. One of the Norwegian union board members recalls what they talked about with 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.'" The union branch representatives in the board clearly recommended a nonconfrontational approach.

A Traveling Model

A NUMET branch at Equinor Tanzania was established in 2014, and twenty-three of the twenty-six employees in attendance joined the trade union. By the end of the year, a recognition agreement with Equinor was signed. However, the first wage negotiations after unionization showed that the parties held vastly different views. The Norwegian members of the Equinor Tanzania management 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 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. As Behrends, Park, and Rottenburg (2014) have pointed out, those who support or sponsor a traveling model often advocate for "responsible" handling of the traveling model, but models often come "to be used in ways other than intended" (see also Lange 2008).

One does get the impression that the management of Equinor Tanzania did not consider 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 (see introduction). 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 they felt that the Norwegian management did not fully understand the economic burden of private education in the country. Support for education is more attractive in Tanzania than a general pay raise because of 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.

Capacity Building

After the first unsuccessful wage negotiation between Equinor Tanzania and the NUMET branch, the management decided that it was important to increase the Tanzanian staff's knowledge of

Figure 8.2. The office of the National Union of Mine and Energy Workers in Tanzania (NUMET). The staff at Equinor Tanzania established a union branch under NUMET. The branch leadership were taken to Norway for "capacity building." © Siri Lange.

industrial relations in Norway. As one of the Norway-based human resources (HR)[5] staff members diplomatically put it: "They had a slightly 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 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 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.

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 had meetings with several central actors in Norway, including the Confederation of Norwegian Enterprise (Næringslivets Hovedorganisasjon, NHO). According to the Equinor HR representative, the union representatives "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.

The great majority of NUMETs members work at large-scale mines owned by multinational corporations. Several of these companies and their suppliers have actively engaged in union crushing. In an informal conversation, an expat manager of a drilling company shared with me 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[6] and 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.

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. 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 (Zajak et al. 2017: 908). To NUMET, it was therefore important to showcase their cooperation with Equinor as broadly as possible to attract new members and to come through to Equinor as a reliable, nonconfrontational partner.

From a Radical to a Reformist Union

Despite the capacity-building efforts by the Norwegian Union branch and the Norwegian Confederation, the union leadership of the NUMET branch at Equinor Tanzania was perceived by many of the staff members as being too conflict oriented, "fighting with the management." The majority of branch members were in favor of opening dialogue rather than taking a combative stance, and they wanted a reformist style of unionism. In February 2016, the branch leadership was overthrown by the members, and a new leader, who was described as "calm" (*mpole*) and who collaborated well with the management, was elected.

News of the conflict reached the Industri Energi union in Norway, which asked for an update on behalf of the International Affairs section of the Federal Union (LO-Norway).[7] The new NUMET branch leadership put together a brief report where they introduced themselves and their backgrounds and reported that only ten of twenty-two local staff were members, which meant that they did not qualify for a collective bargaining agreement under Tanzanian law. The report lists six priority areas of the branch. 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 [the Tanzania Gas Project]"[8] (NUMET Tanzania Statoil Branch 2016). The employees in Tanzania have, to a large degree, adopted a model of close collaboration between management and the union branch; in other words, a reformist union model.

In the small and simple offices that house the NUMET headquarters in Mwanza, large 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 for 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 that in his experience it is often the company that determines which union the employees are members of. 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." This statement 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 (2019: 112) found that union leaders tend to make "emotive appeals to languages of struggle that they are usually unable to fulfil in their daily activities." 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.

Since the heydays, the unionization efforts at Equinor Tanzania have lost momentum. The union branch is far from reaching its original goal of a collective bargaining agreement since it lost many members, partly due to the turmoil, partly due to the downsizing of the office in Tanzania.

The "Business Case" for Support of Unions

Seeing the unionization process over time demonstrates that the Equinor management's attitudes shifted as the final investment decision kept being postponed. According to the former HR manager at Equinor Tanzania, the visit to NUMET's headquarters was a strategic decision by the company because the management expected the number of employees to grow significantly. "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 (see chapter 4). "Things were tidy and orderly," she argued, "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).

For Equinor Tanzania, which expected to have thousands of employees, the prospect of collaborating with one union rather than several smaller ones was attractive. An additional factor that may have spurred Equinor Tanzania to make efforts to establish a good relationship with NUMET is fear of negative attention from the media as well as civil society organizations in Norway and Tanzania. Some MNCs in Tanzania have a bad reputation regarding labor relations, and foreign company abuse of workers' rights has attracted "considerable criticism from NGOs, trade unions and the media" (Lauwo and Otusanya 2014: 96, 101). If Equinor invests in Tanzania, a serious labor conflict would probably be addressed by Tanzanian civil society organizations (CSOs), as well as by Tanzanian and Norwegian media. Equinor's investment in the union branch must be seen in this context as well.

However, when the investment in Tanzania became less certain, the HR manager at Equinor Tanzania admitted that the company's engagement for getting the staff unionized had been reduced. As he put it, "there is no longer a business case" for securing the long-term rights of the employees. The Oslo-based Norwegian HR 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 commitment that Equinor Tanzania is willing to make.

The Missing Link: A Global Work Council

Within the EU, any company that has more than 1,000 employees of which 150 or more work in two different EU member states is mandated to have a European Works Council (EWC). The councils enable the employees to contribute to the "decision-making process in transnational issues" (ILO 2009: 77). 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 Directorate for Development Cooperation) to provide pilot funds to start a Global Works Council for Equinor staff in the different countries where the company operates. Although Equinor has operations in several developing countries, the initiative was not granted support.[9] 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. Therefore, as there is no Global Work Council for Equinor, the NUMET branch's ties to the Equinor branch of Industri Energi (Oslo) are informal.

Internationalization of employment tends to fragment worker representation. As Robert Scholz and Sigurt Vitols (2019: 236) 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." A Global Work Council for Equinor employees would have given the Tanzanian representatives a platform for learning from unions that are more like themselves than Industri Energi, and it would have given them a very different form of bargaining power across borders. However, the company was quite resistant to this idea; therefore, the union representatives no longer see it as a realistic goal, indicating that, although Equinor has signed a global framework agreement with IndustriAll, there are clear limits to how much the corporation is willing to cooperate 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.[10] 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 seven hundred oil workers went on strike over pension rights, the government decided to force the parties to compulsory arbitration. The ILO was very critical of this (IndustriAll

2012). This case illustrates how the 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 only—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).

Conclusion

This chapter has analyzed 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 an example of a "traveling rationality," where the goal is to transfer a social mode 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 talked warmly of the "Norwegian model" and how beneficial it is for both the company and its employees. The objectified model they referred 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—were under communicated.

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). To the Tanzanian staff then, 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, such as support for education for their children, but also because the trips to Norway were attractive on both economic and social terms.

At the time of data collection, the view that cooperation and dialogue is beneficial to both workers and the corporation appeared to be hegemonic among my interlocutors both in Industri Energi and the Norwegian section of the MNC. 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 was transformed from radical to transformist, and the branch members listed "good cooperation at all times" with the management as their main priority. Trade unions do discipline workers (Houeland 2018). Up to now, Equinor appears to have benefited from their support for the establishment of a local union branch, and if the company decides to invest in Tanzania, it will certainly be an advantage for the company to have a union branch in place that sees cooperation with the management as central to its mandate. 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. It should be noted that over the years that Equinor has been in Tanzania, the Norwegian management has shifted several times. In 2019, I discussed the issue of unionization with one of the top managers who strongly disagreed with the idea that the "Norwegian model" could be exported to Tanzania.

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—such as where the board happens to pay a visit at a specific time—and local characteristics—such as whether the local union culture is reformist, emphasizing social dialogue, as in Norway, or radical and dismissive of 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, therefore the quotes may not be verbatim in the strict sense.
2. The union has sixty thousand members and a history of negotiating very good conditions for its members working offshore.
3. IndustriAll Global Union, 2018, retrieved 25 July 2020 from http://www.industriall-union.org/.
4. The Corporate People and Leadership Department. For Equinor's organization chart, see https://www.equinor.com/en/about-us/organisation.html.
5. Corporate People and Leadership (PL)

6. The employer explained that he organized English-language training for the local staff. "Doing small things like that keeps them away from the union." In addition to free language training, he offered them good pay raises and told the workers that they could not hold union meetings on work premises.
7. Email correspondence made available to the author.
8. This is followed by: "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 Tanzania Statoil Branch 2016).
9. Camilla Houeland, personal communication, 13 March 2020.
10. Ståle Knudsen, personal communication, 12 March 2019.

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