

Organising for 'fair' markets

Rendering the Fairtrade Labelling Organisations Internationals view of 'fair trade' visible through its standards

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Introduction: Organising markets to trade 'fair'

The recognised difficulties for nation states to cope with transnational phenomena such as environmental problems, international labour conditions and global trade by traditional legal means have opened up for new types of regulation in the global arena (Brunsson & Jacobsson 2000). Most often these rules are issued by non-state organisations producing standards, action plans, rankings and indicators with the aim to influence the behaviour of individuals and organizations. These organisations are in many cases meta-organisations (Ahrne and Brunsson 2008), which have other organisations rather than individuals as members. Meta-organizations such as the ILO (International Labour Organization), OECD (Organization for Economic Co-operation and Development) or SAMC (Swedish Association of Management Consultants) are increasingly important actors for understanding contemporary processes of regulation and coordination of political activities. Even though they do not have much formal authority over their members, meta-organisations are crucial for understanding through which mechanisms the globalisation of markets takes place (Ahrne & Brunsson 2008). Among other things, they take active part in giving meaning to powerful concepts shaping reality and activities of organisations and individuals (Meyer et al 1997).

One such concept is *fair trade*. It is important to understand that the definition of fair trade takes place on many parallel arenas, both at national and international level, and that meta-organisations are important links in the process of diffusing global definitions in the ideoscape of fair trade (Appadurai 1996). The notion of ideoscape tells us that ideas transcend organizational borders and form new boundaries based on where ideas travel. This motivates a closer study of meta-organisations' role in defining what fair trade can mean. Some examples are international organisations like the World Fair Trade Organization (WFTO) and the European Fair Trade Association (EFTA) and regional ones such as the African Fairtrade Network (AFN), Coordinadora Latinoamericana y del Caribe de Comercio Justo (CLAC) and Network of Asian Producers (NAP) EAPN-EU. However, one of the most important actors in formulating and representing what fair trade might mean in the global market is the meta-organisation, the Fairtrade Labelling Organisation International (FLO) since they set the standards for the fairtrade label in Europe, Australia, New Zealand, Canada, USA and Japan. It is through the standards that

the FLO's ideas on what fair trade should be about become visible. In meta-organisations soft measures of governance such as standards are especially important since part of their influence is decided via these types of 'regulation by publication' (Snyder 1994:199). When policies become visible, actors are constrained and enabled in their understanding and usage of, in this case, fair trade. Hence, it becomes difficult to develop policies building on other definitions than the established ones (cf Thedvall 2006).

In this paper, focus is placed on the FLO's standards for the fairtrade label. Particular attention is placed on the standards documents themselves and the norms attached to them. It is argued that they are actors in themselves in the global economy producing representations (Helgesson et al 2004) and organising fair markets. Standards are developed to set to make the goals of the FLO and the fairtrade label visible. They are developed to enable evaluation and monitoring of producers and traders keep that use the fairtrade label. In this process of changing the rules of the game of the market, imposing a new spirit of capitalism in Boltanskis and Chiapello's (2007) terms, the FLO takes an active part in giving meaning to the idea of fair products and fair trade in the global market.

The meta-organisation, the FLO springs out of the fair trade movement. The Fair trade movement has been active since the 1940s, but it was not until the 1988 that the first fair trade label was developedⁱ, the Max Havelaar label in the Netherlands. This is sometimes referred to in the literature as the shift from the alternative trade dominant movement to the certification/labelling dominant movement (see, for example, Nicholls & Opal 2004; Raynolds et al 2007:17). Since 1988, a number of different fair trade labels have been developed. Many of these fair trade labelling organisationsⁱⁱ soon started to cooperate and in 1997 this cooperation was formalized into a meta-organization, the Fairtrade Labelling Organisation International (FLO) (see, for example, Renard 2003, Raynolds et al 2007; Reinecke 2008, Thedvall 2009). In 2002, the FLO developed their own label, which most national labelling initiatives now use. At the same time they began to set standard for the label and started to certify producers and traders according to the standard. In 2004, the FLO was divided into FLO e.V and FLO-Cert. This was partly a result of FLO-Cert becoming ISO 65 Accredited, which states that standard setting and the certifying organisation cannot be the same. Now, FLO-Cert is an independent profit-making

organization that certifies producers and traders according to the FLO e.V standards. Recently, the FLO also changed membership to include the producer organizationsⁱⁱⁱ. The Producer Networks represent the different countries that are part of FLO's geographical scope, which are mainly states from the geographical South^{iv}. Any Fairtrade Certified Producer Organisation may join the Producer Network to which they belong. It is important to note here that a single producer's product cannot be Fairtrade certified, but it has to be a product within a Producer Organisation, such as a co-op or the like. However, this is currently under consideration. Organisationally the Producer Networks meet in the Producer Network Assembly and the Labelling organisations meet in the Labelling Initiatives Assembly. They all meet annually in the General Assembly where they mainly decide on membership issues and elect and approve the Board of Directors (www.fairtrade.net). The Board of Directors consists of five representatives from the Labelling organisations, four representatives from Fairtrade Certified Producer Organizations, two representatives from Fairtrade Certified Traders and two external board members and they meet about four times a year.

In this study, I have mainly followed documents (cf. Riles 2006) and how they bring out particular representations of fair market. I have followed FLO's website and documents published on the website since 2006. I have also made interviews at the FLO e.V and FLO-Cert as well as with representatives of Producer networks from Asia and Africa in 2009. The FLO is a growing organisation and it is constantly redefining its standards and criteria. There is a continuous discussion about what new areas the fairtrade label should enter and what it could mean. This means that new product standards are changed all the time when new products are included. It also means that the generic standards have changed two times quite significantly (17 December 2007, 1 January 2009) and two times with minor changes (1 March 2007, 15 August 2010), since I began this research. At the moment, the standards are changing again. This time it is a major change of the structure of the generic standards and a change in the division of the products in new categories. During the summer of 2010 there have been stakeholder consultations on the New Standard Framework as it is named and the new standards are planned to be in force January 2011. Here, the generic standard for small producer organisations is in focus. I return later to the different standards that the FLO produce. A comparison between the previous standard for small producer

organisations (17 December 2007), the current standard for small producer organisations (15 August 2009) and the draft standard for small producer organisations currently under review bring out what aspects the FLO focus on in regards to the notion of fair trade in the global market.

Representations of fair trade: the standards' documents

Setting a standard is part of making visible what are important criteria for a producer and trader to fulfil if they want to use the fairtrade label. It is also a way to contribute the ideoscape of fair trade in the global arena. The standards create representation and attempts to organise fair markets. The meaning of the label is made visible in text through documents such as the generic standards or the product standards. The FLO's web-site is one of the instruments used to make the FLO's views visible in the world. It is at the web-site that the standards are published and made official. The latest examples are soybeans and pulses in February 2009 and gold in March 2010. It is possible to have fairtrade labelled almonds since 22 October 2010. The same goes for the fresh vegetables standard that since 1 September 2009 includes sweet potatoes. It is also through the web-site that new processes are announced such as the stakeholder consultation on the new standard framework for fair trade that has been going on between 15 June and 15 August 2010. Through this process the notion of fair trade is being revised and the standards re-organised. This has consequences for what fair trade may be about. Before I go into detail of the changes I first explain the context of the standard.

At the moment, the standards at FLO are divided into Generic Standards and Product Standards. The generic standards are divided into producer standards and trader standards. The producer standards are divided into standards for small producer organisations, contract production and hired labour. The Product standards are divided into product standards for small producer organisations^v and hired labour situations^{vi}. As mentioned above, a comparison between the previous standard for small producer organisations, the current standard for small producer organisations and the draft standard for small producer organisations currently under review bring out what aspects the FLO focus on in regards to the notion of fair trade.

The organisation and content of the Standard

The actual standard document in itself is a description and representation of what a fair market would look like. It contains words and images of what fair trade should be about. The standards are representations of what fair trade is all about and in this way contribute to organising fair markets. Or put in another way, the standards are *performative* (Latour 1986). It is therefore important to study how the standard document is organised and what content it wants to project. I begin by discussing the structure in relation to the headings of the document. The use of words and the hierarchy and placement of the words in the headings of the document signals what is important and what representations of the fair market that the FLO wants to envisage. Below are the headings of the three different generic standards for small producer organisations, the previous version, the current version and the draft, possibly future, version.

Previous version 17.12.2007	Current version 15.08.2009	Draft version 15.08.2010
1. Social Development	1. Social development	1. Trade
1.1 Fairtrade adds Development Potential	1.1 Fairtrade adds to Development	1.1 Traceability
1.2 Members are Small Producers	1.2 Members are Small Producers	1.2 Contracts
1.3 Democracy, Participation and Transparency	1.3 Democracy, Participation and Transparency	2. Production
1.4 Non-discrimination	1.4 Non-discrimination	2.1 Internal Management System
2. Economic Development	2. Socioeconomic Development	2.2 Environmental Protection
2.1 Fairtrade Premium	2.1 Fairtrade Premium	<i>2.2.1 Pest Management</i>
2.2 Export Ability	2.2 Economic Strengthening of the Organization	<i>2.2.2 Genetically Modified Organisms (GMO)</i>
2.3 Economic Strengthening of the Organization	3. Environmental Development	2.3 Labour standards
3. Environmental Development	3.1 Impact Assessment, Planning and Monitoring	<i>2.3.1 Freedom from discrimination</i>
3.1 Impact Assessment, Planning and Monitoring	3.2 Agrochemicals	<i>2.3.2 Freedom of labour</i>
3.2 Agrochemicals	3.3 Waste	<i>2.3.3 Freedom of Association and collective bargaining</i>

3.3 Waste	3.4 Soil and Water	<i>2.3.4 Conditions of Employment</i>
3.4 Soil and Water	3.5 Fire	<i>2.3.5 Occupational Health and Safety</i>
3.5 Fire	3.6 Genetically Modified Organisms (GMO)	3. Business and Development
3.6 Genetically Modified Organisms (GMO)	4. Labour Conditions	3.1 Social Development
4. Labour Conditions	4.1 Employment Policy	<i>3.1.1 Development Potential</i>
4.1 Forced Labour and Child Labour	4.2 Freedom from Discrimination	<i>3.1.2 Democracy, Participation and Transparency</i>
4.2 Freedom of Association and Collective Bargaining	4.3 Freedom of Labour	<i>3.1.3 Non-discrimination</i>
4.3 Conditions of Employment	4.4 Freedom of Association and Collective Bargaining	3.2 Economic Development
4.4 Occupational Health and Safety	4.5 Conditions of Employment	<i>3.2.1 Fairtrade Premium</i>
	4.6 Occupational Health and Safety	3.3 Environmental Development
		<i>3.3.1 Environmental management</i>
		<i>3.3.2 Soil and Water</i>
		<i>3.3.3 Waste</i>
		<i>3.3.4 Biodiversity</i>
		<i>3.3.5 Energy and Greenhouse Emission</i>

In the table above it is possible to see that the headings of the standard have changed. There are minor changes between the previous and the current version where the first level headings are basically the same. In the previous version the document was divided into standards that are devoted to social development, economic development, environmental development and standards on labour conditions. In the current version the document is divided into social development, socioeconomic development, environmental development and labour conditions. Under the heading of ‘economic development’ the previous version included writings on the Fairtrade Premium, Export Ability and Economic Strengthening of the Organization. The new version has excluded Export Ability and specified the other two in more detail. To change the heading to socioeconomic development could suggest more emphasis on economic issues that are connected to social issues. However, the draft version the heading is changed back to ‘economic development’. As can be seen in the table above most of the headings in the current standard have also been put under the heading of Business and Development in the draft standard, except for Labour Conditions that are included under the heading Production in the draft standard. What has happened?

The FLO themselves argue that the changes in the standard are made because they want to: 'highlight specific Fairtrade features (Business and Development standards) and to facilitate future benchmarking and recognition of other labels (Production standards, Trade standards)' (Guide to NSF Consultation)^{vii}. They also want to give: '...more space for self-determination of producers, providing tools for self determination of development paths, adapted to their individual producer situations (Business and Development Plans)' (Guide to NSF Consultation).

This has resulted in the move of certain aspects in the standard into the so-called Business and development plan. In an effort to involve and leave some of the decisions to the producers some of the requirements are now suggested to be in the Business and Development Plan that the producer organisations now have to write. However, it is not completely left to the certified organisations to decide what they want to write in the Business and Development Plan. When writing the Business and Development Plan the producers should take into account the ideas under 'potential development' that was part of the minimum requirements before. One such example is under the heading of Democracy, Participation and Transparency. One suggested change is as follows. Instead of 'Administration is in place' the minimum requirement now reads:

'Minimal administration is in place, enough to account for receipt and use of Fairtrade benefits.'

The explanatory text in the document from 15 August 2009 is now moved to a new category: Potential development.

Another example is under the same heading of Democracy, Participation and Transparency. The draft standard now reads:

'An organizational structure that is in place which enables effective control by the members. There is a General Assembly with direct or delegated voting rights for all members as the supreme decision-taking body, ~~and an elected Board. The staff answers to the~~
~~General Assembly via the Board.~~ (Annex 1a SPO^{viii})

The part that is crossed over is no longer mandatory for certification but they are still considered good guidance when writing the Business and Development Plan. The FLO has also set up draft Business and Development Lists for there different generic standards such as the one for Small Producer organisations. It is organised into three headings: Sustainable livelihoods, Empowerment and Making trade fair^{ix}. The producer organisations have to explain how the attempt to achieve progress according to prescribed guide. The same goes for the mandatory Environmental Plan and the Biodiversity Plan. In this way, the draft standard is made less strict in its reading but it has resulted in the obligation to produce different plans such as the Business and Development plan, the Environmental plan and the Biodiversity plan.

Words in fashion to define fair trade

The meaning of ‘fair trade’ in relation to the fairtrade label is continuously created and re-created by individuals, in this case by stakeholders in the fair trade movement as well as employees within the Fairtrade Labelling Organisation International and its certifying organisation FLO-Cert (and sometimes by researchers). It may change depending on the stakeholders view and room for manoeuvre. ‘Fairtrade’ is in Gallie’s (1956) terms an ‘essentially contested concept’, i.e. a concept ‘...which inevitably involves endless disputes about [its] proper uses on the part of [its] users’ (1956:169). Words are invented that signal particular political aspirations and ideals. To guide what the ‘fairtrade’ label should be about, the stakeholders and the bureaucrats at the FLO make efforts to frame the direction by proposing criteria that are intended to describe what ‘fair trade’ means.

In the process of forming classifications for the label, the meaning of ‘fair trade’ is, in this way, interpreted through keywords (Williams 1976:13), i.e. words that are particular to, and which have particular meaning within the fair trade movement such as ‘sustainable development’ (Key objective of the standards 2009 see, www.fairtrade.net/aims_of_fairtrade_standards.html.) or Democracy, participation and transparency (previous version, current version, draft version). One keyword may also in one context constitute a definition of another keyword, and in another context the second keyword may provide a definition of the first such as in the case of the current standard

compared to the draft standard where Democracy, participation and transparency is moved to be a definition at the third level instead of the second in the hierarchy of keywords. However, what signifies them is that, despite changes in meaning and level in the classification system, the words are often the same or similar over time. These words are imbued with ideas that narrow the focus of what 'fair trade' might mean.

In comparison, the standards highlight certain values that return in all the versions. There is the reference to the sustainable development discourse of the three pillars: social, economic and environmental (WCED 1987). The different sections are named Social development, Environmental development and Economic/Socialeconomic development. It sets the fairtrade discussion in a particular global discourse on the global economy, where actors in the market place should aim at producing and trading in a sustainable fashion that take into account all three aspects. However, in the draft version these keywords are moved to the Business and Development section where some of its demands in the current version are moved to the Business and Development Plan. In the draft version, there is a stronger emphasis on the terms for production and trade when entering into the labelling scheme and some of the sustainable development issues are move to be about development.

Other values that return in all the versions are concepts such as 'Democracy, participation and transparency', 'non-discrimination' and 'Labour Conditions'. Concepts such as Democracy, participation and transparency are buzzwords that may be seen in policy documents from all sorts of international and transnational organisations, state governments as well as private corporations (Sanders and West 2003, Florini 2003, Thedvall 2006, Garsten & Lind de Montoya 2008). In the fair trade standards, the focus is place on the need to have a general assembly that is elected by the members of the organisation. The process of election and administration also has to be transparent in the sense that records have to be produced to show how they are doing this (see Endnote xi).

Non-discrimination is also a popular concept in global discourse (see, for example, Thedvall 2006). In both the current and the draft standard it can be read:

'Minimum requirement

The organization does not discriminate against members or restrict new membership on the basis of race, colour, sex, sexual orientation, disability, marital status, age, religion, political opinion, language, property, nationality, ethnicity or social origin. Furthermore, there must be no discrimination regarding participation, voting rights, the right to be elected, access to markets, or access to training, technical support or any other benefit of membership.’

Discrimination is making an unfair distinction in the treatment of one person over another on grounds that are not related to ability or merit.

Where particular forms of discrimination exist within an economic sector or geographical region, the organization is expected to show progress towards removing them.

Who may become a member of an organization, and the process for joining, must be made explicit in the constitution and/or the statutes. These may not include restrictions that discriminate against particular social groups on the grounds listed in the standard.’

The notion of ‘non-discrimination’ has its own heading under the heading of Social Development. However, it also included in Labour Conditions under the heading of Freedom from Discrimination in the current and the draft version. The fairtrade standards labour conditions are inspired by the ILO conventions on labour conditions. It is possible to trace the FLO’s visions from the ILO’s Declaration on Fundamental Principles and Rights at Work, where four areas are emphasised: freedom of association and the right to collective bargaining, forced labour, equality of opportunity and treatment, and child labour. The previous version of the FLO’s standards put forward the following areas as important for Labour conditions: Forced labour and child labour, Freedom of association and collective bargaining, Conditions of employment and Occupational health and safety. In the current version, two new areas are included: Employment policy, which states that the certified organisation has to develop an employment policy and Freedom of labour which includes the issues that was previously under the heading of forced labour and child labour. In the draft version they are changed into Employment policy, Freedom from discrimination, Freedom of labour, Freedom of Association and collective bargaining, Conditions of employment and Occupational health and safety.

To sum up: Through the comparison of the different versions it is possible to see how certain aspects are focused in the FLO’s standard and the fair trade discourse. There are particular values that are emphasised such as labour conditions that prescribe freedom from discrimination, freedom of association and collective bargaining. The need to consider

occupational health and safety at the workplace as well as freedom from forced labour and child labour. The FLO's standards have also focused on issues such as democracy, participation and transparency as well as non-discrimination. They are concepts that are recognisable in the global discourse of national, international and transnational organisations, but also have its own specific meaning in the FLO standards.

Conclusion

In this paper, I have focused on the FLO's standards for the fairtrade label. Particular attention is placed on the standards documents themselves and the norms attached to them. Ideas such as freedom of association and collective bargaining, transparency, democracy, participation, freedom from forced labour and child labour, non-discrimination are emphasised through the standards document. It is evident that these words that are used to define what fair trade is about are recognisable from other areas of the global discourse on how market production and exchange should be performed. The notion of fair trade is in this way connected to other ideas and values of how to organise the global economy. However, the FLO is also an important actor in promoting these values through its standards documents. Their standards documents make up a particular ideoscape of fair trade in the global economy. It has been argued that they are actors in themselves in the global economy producing representations and organising fair markets. The FLO takes, in this way an active part in giving meaning to the idea of fair products and fair trade in the global market.

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Endnotes

ⁱ For a historical overview see for example Reynolds et al 2007:7ff.

ⁱⁱ **List of Labelling Initiatives in August 2010:** *Full members:* Fairtrade Labelling Australia and New Zealand, Fairtrade Austria, Max Havelaar Belgium, TransFair Canada, Max Havelaar Denmark, Fairtrade Estonia, Estonia, Reilun kaupan edistämisyhdistys, Finland, Max Havelaar France, Transfair Germany, Fairtrade Mark Ireland, Fairtrade TransFair Italy, Fairtrade Label Japan, Fairtrade Lativa, Latvia, Fairtrade Lithuania, Lithuania, TransFair Minka Luxembourg, Stichting Max Havelaar Netherlands, Fairtrade Max Havelaar Norway, Asociación para el Sello de Comercio Justo Spain, Rättvisemärkt Sweden, Max Havelaar Stiftung Switzerland, Fairtrade Foundation UK, TransFair USA *Fairtrae Marketing Organizations:* Fairtrade Label South Africa, The Czech Fair Trade Association Czech Republic *Associate members:* Comercio Justo Mexico, Fairtrade Label South Africa

ⁱⁱⁱ Producer Networks are organisations which Fairtrade Certified Producer Organisations may join if they so wish and which are recognised by FLO as the representative body of farmers, workers and others belonging to Fairtrade Certified Producer Organisations. In August 2010, there were three producer networks in the three continents, Africa, Asia and Latin America, where Fairtrade Certified Producers Organisations are: African Fairtrade Network (AFN) founded in 2004, Coordinadora Latinoamericana y del Caribe de Comercio Justo (CLAC) founded in 1996, Network of Asian Producers (NAP) founded in 2005 (see www.fairtrade.net).

^{iv} **List of geographical scope in August 2010:** **AFRICA:** *Eastern Africa:* Burundi, Comoros, Djibouti, Eritrea, Ethiopia, Kenya, Madagascar, Malawi, Mauritius, Mayotte, Mozambique, Rwanda, Seychelles, Somalia, Uganda, United Republic of Tanzania, Zambia, Zimbabwe *Middle Africa:* Angola, Cameroon, Central African Republic, Chad, Congo, Congo Democratic Republic, Equatorial Guinea, Gabon, Sao Tome and Principe *Northern Africa:* Algeria, Egypt, Libyan Arab Jamahiriya, Morocco, Sudan, Tunisia *Southern Africa:* Botswana, Lesotho, Namibia, South Africa, Swaziland *Western Africa:* Benin, Burkina Faso, Cape Verde, Cote d'Ivoire, Gambia, Ghana, Guinea, Guinea-Bissau, Liberia, Mali, Mauritania, Niger, Nigeria, Saint Helena, Senegal, Sierra Leone, Togo
AMERICAS (Latin America and the Caribbean) *Caribbean:* Anguilla, Antigua and Barbuda, Barbados, Cuba, Dominica, Dominican Republic, Grenada, Haiti, Jamaica, Montserrat, Saint Lucia, Saint Kitts and Nevis, Saint Vincent and the Grenadines, Trinidad and Tobago, Turks and Caicos Islands *Central America:* Belize, Costa Rica, El Salvador, Guatemala, Honduras, Mexico, Nicaragua, Panama *South America:* Argentina, Bolivia, Brazil, Chile, Colombia, Ecuador, Guyana, Paraguay, Peru, Suriname, Uruguay, Venezuela (Bolivarian Republic of)
ASIA *Central Asia:* Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan, Uzbekistan *Eastern Asia:* China*, Democratic People's Republic of Korea, Mongolia *Southern Asia:* Afghanistan, Bangladesh, Bhutan, India, Islamic Republic of Iran, Maldives, Nepal, Pakistan, Sri Lanka *South-Eastern Asia:* Cambodia, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Philippines, Thailand, Timor-Leste, Viet Nam *Western Asia:* Armenia, Azerbaijan, Georgia, Iraq, Jordan, Lebanon, Occupied Palestinian Territory, Oman, Saudi Arabia, Syrian Arab Republic, Yemen

OCEANIA *Melanesia*: Fiji, Papua New Guinea, Solomon Islands, Vanuatu *Micronesia*: Kiribati, Marshall Islands, Federated States of Micronesia, Nauru, Palau *Polynesia*: Cook Islands, Niue, Samoa, Tonga, Tuvalu, Tokelau, Wallis and Futuna Islands (see www.fairtrade.net).

^v **List of products Small Producer Organisations in August 2010**: Bananas, Cocoa, Coffee, Dried Fruit, Fresh vegetables, Fresh Fruit (except bananas), Fruit juices, Gold, Herbs and Spices, Honey, Nuts and Oil Seeds, Quinoa, Rice, Seed Cotton, Soybeans and Pulses, Cane Sugar, Tea, Timber, Wine grapes.

^{vi} **List of products Hired Labour in August 2010**: Bananas, Flower and Plants, Fresh Fruit (except Banana), Fruit Juices, Sportballs, Tea, Wine grapes

^{vii} Available at the FLO's website www.fairtrade.net under the heading Standards-Standards in progress visited 2010-08-11. Copy in author's possession.

^{viii} Available at the FLO's website www.fairtrade.net under the heading Standards-Standards in progress visited 2010-08-11. Copy in author's possession.

^{ix} The Business and Development List for Small Producer Organisations is available at the FLO's website www.fairtrade.net under the heading Standards-Standards in progress visited 2010-08-11. Copy in author's possession