



Fair Trade and the International Moral Economy: Within and Against the Market

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Fair Trade and the International Moral Economy: Within and Against the Market

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Abstract:

This article is about the fair trade network that has developed over the past twenty years in response to the negative impact of globalization; in most underdeveloped countries, this impact has taken the form of increased underemployment, poverty, and inequality. Fair traders seek to combat the injustices of global capitalism by promoting the principles of democratic organization; no child labor; recognized trade unions for workers; and environmental sustainability. The article argues that fair trade represents the founding of a nascent international moral economy which unites producers and consumers to demand greater social and ecological justice than the imperatives of the market allow. It remains to be seen, however, if fair trade's ethical goals can withstand the various pressures that the global market imposes upon it.

FAIR TRADE AND THE INTERNATIONAL MORAL ECONOMY: WITHIN AND AGAINST THE MARKET ¹

Over the past two decades. globalization and its related neoliberal policies of trade liberalization and state downsizing have resulted in increases in underemployment, poverty, and inequality in most underdeveloped countries.² These social impacts have been negative accompanied by a global environmental crisis characterized by overpopulation, the destruction of the ozone laver, loss of diversity, acid rain, nuclear genetic contamination, tropical deforestation, desertification, floods, famines, pollution of coastal waters, toxic waste—the list goes on. As globalization tears down the sociopolitical barriers that once inhibited the unchecked operation of the global market. the imperatives of capitalism—the singleminded pursuit of accumulation driven by the corporate need to remain competitive and survive—take increasing precedent over the imperatives of ecological and social iustice.3

In response to the negative impact of globalization, new alternative economic projects have emerged initiated by those whom globalization has "cast off." Among these projects have been efforts to organize "fair trade" production and commercial exchange to combat the injustices of global capitalism by promoting the principles of democratic organization, no child labor, recognized trade unions for workers, and environmental sustainability. Fair trade goods are exchanged under the terms of a minimum guaranteed price and include "social premiums" paid by the buyer to producer communities for the development of social infrastructure such as hospitals, roads, and schools. The goal is to forge a long-term relationship between buyer and

seller that can provide some stability against market fluctuations.⁵

Fair trade goods are certified by independent labeling initiatives that audit fair trade producers, retailers, and roasters and then grant those who qualify the right to use the fair trade label in exchange for a user fee. The largest fair trade labeling initiative in the world is Max Havelaar/Trans Fair which is composed of National Initiatives (NIs) in seventeen countries in Europe, North America, and Japan and recently Fairtrade into Labelling Organizations International (FLO) in order to better coordinate the various national efforts. FLO currently has standards for seven commodities: coffee, cocoa, honey, cane sugar, tea, bananas, and orange juice. Consumers in Switzerland have purchased the greatest quantity of fair trade certified goods (34.8% of all FLO certified fair trade products from 1997-2000), followed by consumers in the Netherlands (24.7%), Germany (17.6%), Great Britain (9.8%) and the remaining fair trade countries (13.1%-among them is the US at 0.2% of the total). Mexico, Spain, and Australia are currently in the process of developing their own fair trade initiatives.6

Over the past thirty years, the fair trade network has grown steadily and made some notable inroads into European and North American markets. In 2000, FLO estimated the total value of retail turnover of fair trade labeled products to be over 220 million Euros, representing an increase of over 400% since the early 1990s.⁷ The growth of fair trade represents a potential alternative to the destructiveness of the unchecked global capitalist market. Nowhere is this more apparent than with the development of fair trade coffee, the largest fair trade sector. In recent years, fair trade coffee certified by FLO has taken over as much as 5 percent of the coffee market in Switzerland, 3 percent in the Netherlands, and around 1 percent for the rest of Europe.8 Fair trade coffee is produced under the shade of fruit and nitrogen-fixing trees

essential for a variety of animals and reptiles, with little or no use of chemical fertilizers, herbicides and pesticides. guaranteed price and social premium paid to fair trade farmers has allowed communities develop hospitals, schools, roads, processing facilities and other infrastructure which has raised living standards and made peasant livelihoods more viable. This has permitted peasants to resist seizure of their land by loggers and ranchers. In sharp contrast to this is the traditional, "unfair" system of coffee production which is characterized by the widespread use of Green Revolution chemicals, a reducedshade production system, the hyperexploitation of the laboring poor, and a variety of negative social and ecological byproducts.9

Despite its growth over the past few decades, fair trade remains a tiny proportion of global trade. In the long term, the ability of fair trade to expand and broaden its benefits will depend on its ability to challenge the rule of the market. While many authors tend to view fair trade as a way for producers to seek new opportunities on the global market, fair trade must, in the end, be about challenging the *imperatives* of the specifically capitalist global market if it wishes to remain a true alternative to "exploitation-as-usual." Under the dictates of the capitalist market, individuals must enter into the market in order to gain access to the means of subsistence, and the imperative of competition drives producers to accumulate and exploit their workers or themselves in order to remain competitive and survive. 10 Fair trade does not challenge the basic social relations of capitalist production which underlie these imperatives. In general, fair trade producers are either small private property owners who must compete in the market to maintain their land, or propertyless workers who must enter the labor market to gain access to the means of subsistence. Fair trade cooperatives tend to focus on marketing and processing, and seek to attain protection from the whims of the market for *individual* property owners through cooperative means. Yet, despite its implicit acceptance of capitalist social relations, fair trade does attempt to challenge the imperatives of the market at the point of exchange and to provide an alternative to the individualistic culture of capitalism.

1. Entering the Market: A Market Niche?

With varying degrees of reluctance, most commentators depict fair trade, at least in the short term, as little more than a market Fair trade producers have taken advantage of the existence of a socially and ecologically conscious consumer base in Europe and North America to "enter" the market under more favorable conditions.¹¹ Moral and ideological considerations such social justice and environmental sustainability are an "ethical premium" or a "market advantage" which "adds value" to the final product. 12 Having entered the market through their market niche, fairtraders now seek to expand their consumer gaining greater access base by mainstream coffee roasters supermarkets. To do this, fair-traders must develop a marketing formula based on store display, advertising strategies, and the promotion of top-quality coffee to please consumers in the North and gain their loyalties.¹³ Seen in this way, the short and medium-term viability of fair trade is based on fair-traders abilities to "sell" ethics to consumers. 14 David Ransom, editorial member of the New Internationalist, cautions: "Before you know it - and if you're not very careful indeed - fair trade takes on an uncomfortably close resemblance to any other trade."15

Analyzing fair trade as a market niche reveals how it remains confined by the capitalist market and the imperative of competition. While cooperation and solidarity among fair trade producers and between producers and importers is indeed strong, as a group fair-traders must *compete* on the market against cheaper, "unfair"

goods. 16 The very survival of fair trade depends on the abilities of fair-traders to steal market shares from traditional producers by winning consumer loyalties. In this context, the market remains the final arbiter of prices as fair-traders seek to negotiate the "difficult compromise between ethical principles and the market."¹⁷ While the price for fair trade goods must be higher than the market norm to justify labeling them "fair" in the first place, if the prices are too high consumers will not be willing to pay them. In the final analysis, "fairness" is measured by how much of an "ethical premium" consumers in the North are willing to pay on the market.

In addition, while the values of cooperation and solidarity within the fair trade network are strong, the weight of the global economy still imposes the imperative of competition upon it. According to sociologist Marie-Christine Renard, many fair trade coffee producers will still sell their coffee to traditional middlemen in times of crises or when international prices are competitive with fair trade prices, without regard for the needs of the fair trade coffee network. The need to compete and survive is a powerful imperative against the values of solidarity and cooperation. Of greater importance are the signs that key sectors of the fair trade network may be approaching their market limit. According to FLO, sales of fair trade tea increased only slightly from 1999-2000 by under 2%, sales of fair trade orange juice declined significantly in Germany despite an overall upward trend, and total sales of fair trade honey declined by over 3%. 18 The most alarming trend has been the declining growth of the fair trade coffee market. According to Renard, while exports of fair trade coffee significantly from 4,500 tons in 1991 to 12,000 tons in 1996 they did not grow fast enough to match the growth of new fair trade coffee cooperatives. Consequently, Renard states: "while this network was intended to avoid mechanisms competition, they begin to appear (such as roasters conditioning their purchase of coffee, or the preference for some qualities and/or co-operatives)."¹⁹ For the fiscal year 1999-2000, fair trade coffee sales did not increase at all, causing FLO to be reluctant to register any new fair trade coffee organizations.

These realities threaten to impose escalating competition among fair trade producers as they battle to maintain their share of fair trade sales, or competition between fair trade and mainstream producers as the latter struggle to gain access to the fair trade market. They also threaten to erode fair trade's social and ecological justice goals as the network battles to compete with the mainstream coffee sector for global market sales. FLO attributes the stagnation of the fair trade coffee market primarily to the large price difference between fair trade and conventional coffee which has widened significantly over the past few years due to aggressive new competition Vietnamese producers.²⁰ How will fair trade respond to such fierce price competition? Such are the realities of occupying a market niche.

Despite these difficulties, analyzing fair trade as a market niche presents only part of the picture. The principles of fair trade pose a significant challenge to the logic of the market and the culture of capitalism even if everyday realities force fair-traders to compete within the market that they oppose. Thus fair trade attempts to operate both within and against the market. For this reason, Ransom optimistically states: "fair-traders are used to getting their hands dirty and still keeping clean. In some ways their 'entryism' is more subversive than staying forever on the outside looking in."²¹

2. Against the Market: An International Moral Economy

As E.P. Thomson has pointed out, it is difficult for anyone in our present age to imagine that at an earlier point in world

history it appeared "unnatural" that one person should profit by denying others the basic right to subsistence. Yet this conviction was common amongst local communities in pre-capitalist societies before the imperatives of the capitalist market and the new ideology of political economy replaced the "old moral economy of provision." ²² In his work on eighteenth century England. the nation capitalism first took root, Thompson describes the pre-capitalist moral economy of the poor where notions of common well being, often supported by paternalistic traditional authorities, imposed some limits on the free operations of the market. Premised on an eroded body of Statute law, common law, and local customs, the moral economy of provision asserted that farmers were not allowed to withhold their produce from local markets to wait for prices to increase, that the actions of middlemen were legally suspect and restricted, and that the poor had to be provided with opportunities to purchase grain, flour, or other basic foods in small parcels with properly supervised weights and measures. If the moral economy were violated and the starving masses found themselves in a situation where they did not feel they were being offered a "fair price," riots, which often involved the participants setting new prices for bread and other foods, ensued. According to Thompson, the nineteenth century saw the defeat of the old moral economy of provision and the victory of the new political economy of the free market which, drawing on the work of Adam Smith, asserted that the "natural" supply and demand of the free market would benefit everyone and maximize societies potential.²³

The greatest virtue of fair trade lies in its attempt to take advantage of its market niche to construct a new moral economy, one which crosses national boundaries and re-asserts the notion of people's right to live taking precedence over the flows of supply and demand. Whereas the old moral economy described by Thompson asserted the rights of poor consumers to gain access

to the means of life, the new moral economy of fair trade asserts the right of poor producers to get a fair price for what they sell on the market.

The international moral economy of fair trade asserts principles that challenge the logic of the capitalist market. Whereas the market generates no incentive to invest in such things as roads, sewers, schools, parks, and hospitals except where a profit can be made, 24 a portion of the profits from fair trade sales is paid by the buyer to the producer communities as a social premium to promote the collective good and construct much-needed infrastructure. Moreover, the minimum guaranteed price under which fair trade goods exchanged—a portion of which is paid to farmers *prior* to the harvest to assist them in their work—is a significant departure from conventional prices which are determined by global commodity markets plagued by speculation and glut. The result is prices that are generally well above the market price. Equal Exchange, a U.S. fair trade importer-roaster with sales over \$3.5 million annually, estimates that between 1988 and 1992 it paid \$750,000 more to coffee producers than would have been justified by conventional prices.²⁵ In recent months, world export prices for specialty coffee have taken a staggering dive from around \$1 to \$0.49 per pound while fair trade coffee prices have remained at \$1.26 per pound. The difference in price has saved many fair trade producers from the bankruptcy, mass migration, and starvation experienced by tens of thousands of small-scale coffee farmers worldwide.²⁶ This is a consequence of the founding of a nascent international moral economy: consumers and producers uniting to demand greater social and ecological justice than the imperatives of the market allow.

Another important way in which fair trade's moral economy confronts the logic of the market is by promoting a "critical consumer culture" which challenges the individualistic, competitive, and ethically

impoverished culture of capitalism.²⁷ While the regular operations of the capitalist incapable market are of providing meaningful information about the social effects of private transactions, 28 fair-traders seek to inform consumers about the working conditions of producers and forge greater personal links between the two.²⁹ poses a significant challenge to what Marx termed the fetishism of commoditieswhere social relations among people appear as relations among things—a necessary outcome of the capitalist market in which people engage as atomized workers and consumers. As summed up by Diane Elson, the capitalist market requires.

...treating people merely instrumentally, not as ends in The market does not themselves. encourage me to relate to others as fellow-citizens, members of the same community, who have a multiplicity of goals besides buying products, but only as factors in production processes that have produced the goods available to me to buy. I am able to buy these goods because I have acquired purchasing power through selling my labor power as a factor in the production of goods for someone else.³⁰

Fair trade's moral economy not only involves ethically-minded consumers purchasing fair trade goods, but it also entails activists in the North putting political pressure on transnational corporations to offer fair trade to their consumers or to participate directly in fair trade. The most notable example of this has been the campaign to force Starbucks Coffee, the world's largest specialty coffee roaster, to sell fair trade coffee in its 2,300 stores across the US. Due to pressure by Global Exchange, a San Francisco human-rights group, Starbucks agreed to sell fair trade certified coffee in April 2000, three days before protests in 30 US cities were planned to begin.³¹ Recently, Global Exchange has turned its attention toward Folgers coffee,

owned by Procter and Gamble, and M&M/Mars in an attempt to force them to engage in fair trade.³² Combined with these large-scale campaigns, Global Exchange with local student and also works environmental groups to pressure schools and other community institutions to purchase fair trade goods—essentially participating in what Naomi Klein has termed "local foreign policy."33 These political actions far surpass the intent of surviving in a market niche.

Another aspect of fair trade that challenges the prevailing moral economy of capitalism is its emphasis on solidarity and cooperation over competition individualism. Despite the immense pressures of the global market to impose the latter, fair-traders have managed to promote the former in positive and encouraging The actions of the Unión de ways. Comunidades Indígenas de la Región del Istmo (UCIRI), a fair trade coffee-producing cooperative in Oaxaca, Mexico is telling in this regard. UCIRI has sent technical teams to advise peasant communities seeking to engage in fair trade in the Mexican states of Oaxaca, Puebla and Chiapas, as well as Guatemala and Nicaragua. It has provided ongoing support to other, smaller fair trade cooperatives by making its processing facilities available to them, agreeing to sell their coffee. recommending them as trading partners to Equal Exchange. The cooperatives which UCIRI have assisted now see themselves as pilot groups to other small cooperatives in their region.³⁴ It remains to be seen if fair trade's cooperative values will be able to resist the pressures of the global market in the years to come.

Against the capitalist logic of globalization, fair trade represents a nascent, alternative form of exchange which attempts to place the imperatives of social and ecological justice ahead of the imperatives of the market. Thus, fair trade is not just a market niche operating within the global market; it is also an attempt to construct an

international moral economy that challenges market and the individualistic, competitive culture of capitalism. while acknowledging that this is true, we must not lose sight of the limits of the fair trade moral economy. However radical fair trade objectives may appear in the era of neoliberalism, the challenge which fair trade poses to the global capitalist market is severely restricted by its involvement in it. The ultimate dominance of the agents, mechanisms, and structures of global capitalism remain unaltered and, in many ways, unquestioned.

In evidence of this is the role of giant Multinational Corporations (MNCs) like Starbucks Coffee, Procter and Gamble, and M&M/Mars in the fair trade movement and its vision for the future. Fair traders do not seek to overturn the power of these MNCs, who have been largely responsible for structuring the very unequal global economy within which peasants and rural workers toil, but to persuade them to play by the rules of fair trade on the basis of mutual interest. Fair trade promoters argue that fair trade is not just a moral choice, but a profitable one for MNCs interested in tapping into ethical consumer demand. As mentioned above, Starbucks has recently heard this message and is now selling fair trade coffee in its US stores. In this way, the image-conscious MNC has been able to put a stop to bad publicity from Global Exchange and bolster its public reputation as an ethical corporation. The potential benefits for fair trade producers as a result of this decision are indeed significant as it gives them much greater access to US markets. Nonetheless, it also raises serious concerns about the limits of fair trade

First, in order to deal with MNCs like Starbucks and gain greater access to Northern markets, fair traders have limited their social justice goals to the needs of workers and peasants in the underdeveloped South. No criteria for "fairness" exists to protect workers in advanced capitalist countries. From the perspective of FLO, no

difference exists between Starbucks and Equal Exchange, and alternative trade organization with not-for-profit aims and a modest salary range among workers. Both are licensed to sell fair trade goods, even though Starbucks has fiercely resisted unionization—a requirement for fair trade workers—at every turn. Moreover, Starbucks' entry into the fair trade market poses a significant threat to the viability of such alternative trade organizations that now find themselves up against an enormous competitor with massive financial and marketing resources.

In response to this fact, fair trade activist and author Laure Waridel argues that the sidelining of the needs of workers in advanced capitalist countries is acceptable because, "generally speaking, the rich countries where fair-trade coffee is being bought have stronger labor regulations and better social safety nets than most of the countries where coffee is Moreover, the ultimate goal of fair trade is to get fair trade products on as many sales shelves as possible, for all businesses big and small. Once this is done, she states, "[we] can decide whether to buy it from a small local company or a bigger one."³⁷ assertions reveal a understanding of the powerful global market within which fair trade attempts to impose its moral economy. While workers in the North do indeed have significant benefits over those in the South, these benefits are constant attack by neoliberal reformers. Every cut to social benefits in the North represents a potential loss to the rights that workers and peasants in the South can demand. In addition, the market is not so neutral a space as Waridel suggests and it is not a simple matter for consumers to choose small local fair trade companies over Starbucks, with its near-monopoly dominance of the luxury coffee market and its vast advertising resources.

A second concern posed by the involvement of MNCs like Starbucks in the fair trade movement stems from their motive

for participation: profitability—a necessity for the survival of any corporation under the imperatives of global capitalism. Starbucks commitment to fair trade is contingent on profitability, and, as its decision to participate in fair trade is purely voluntary, it will almost certainly be revoked if fair trade fails to bring the anticipated benefits. Workers' and peasants' rights are thus hostage to the private decisions of Starbucks management who have the power to continuously reassess if improving peoples' lives are in the interest of their corporate needs. This stands in stark contrast to the ideals behind the International Labor Organization (ILO) Conventions. universally recognized code of labor rights that are an oft-ignored legal standard under international law. While fair trade's standards are in fact based on these conventions, the original vision of the ILO was to create a compulsory labor code (as opposed to voluntary) that was strictly enforced by public institutions, both nationally and internationally, not one driven by the short-sighted, profit-driven whims of MNCs 38

Not only does the fair trade moral economy leave peasants and workers as perpetual hostages to the whims MNCs, but it also leaves them dependent on the individual purchasing decisions of northern consumers The relationship between northern consumer and southern worker is one in which the latter possesses no power over the former other than that of moral persuasion. While ethical purchases are a matter of survival to fair trade producers, for consumers they are merely individual market decisions made alongside of a series of other considerations such as cost, convenience, and image. As such, the gains made by fair trade are never guaranteed and are vulnerable to a variety of potential events which can have an impact on the fair trade market, from a decline in disposable income to a consumer backlash against guilt-based products. Gerard Greenfield notes in reflection on social justice shopping: "If we can only talk about

workers' collective rights and struggles in the context of what people choose to buy as consumers...then it seems we face a greater challenge to building a critical, popular social consciousness than we might imagine." The only way to guarantee that workers' rights are protected is to have those rights insured by public institutions. Individual ethical choices can only go so far.

Despite its weaknesses, the fair trade network represents an important force for positive change in the world today. Against the seemingly overwhelming tide of neoliberal structural adjustments and free market dogma, the fair trade moral economy attempts to assert the principle of peoples' basic right to live a decent life free from hunger and poverty taking priority over the allegedly natural flows of supply and demand. Yet the risk of remaining an island of justice in a sea of exploitation—or worse, being swallowed up by the sea—is ever Competition from mainstream producers throughout the global economy is fierce and the potential obstacles to the growth of the fair trade market threaten to impose increasing competition within the network. To avoid a curtailment of its social and ecological justice goals, fair trade must continue to expand its efforts to promote solidarity and cooperation and further develop its alternative projects. This may involve reassessing fair traders' eagerness to deal with giant MNCs, or it might involve new and innovate approaches to providing fair trade producers with greater protection from the market, such as cooperative insurance projects or cooperative property ownership. Whatever direction is chosen, the future of fair trade, if it is to be a promising one, lies in continuing to escalate its efforts to challenge the unchecked capitalist market and its imperatives.

Notes

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³ Foster, 1994,11-33.

⁴ According to Roger Burbach, globalization concentrates and integrates capital, commerce, and trade while at the same time "casting off" industries, peoples, and countries who then have become a force for forging alternative economic projects. See Burbach, 1998, 52-65; In a similar vein, Marie Christine Renard argues that the globalization of the food industry has been characterized by the contradiction between the homogenization of consumption along with the growth of niche markets for alternative forms of food production to emerge. See Renard, 1999, 484.

⁵ For a good summary of the principles of fair trade see David Ransom, 2001, 24-25. Ransom basis his summary on the official principles of Fair Trade Labeling Organizations International (FLO) and the International Federation for Alternative Trade (IFAT), the world's two main fair trade umbrella groups.

⁶ Fairtrade Labelling Organizations International (FLO), 2001.

⁷ In the early 1990s, Michael Barratt Brown estimated the size of all "alternative trade"—a term which encompasses more than just fair trade products—on a global scale to be worth around US \$50 million worth of exchanges per year. See Barratt Brown, 1993, 23. FLO's estimate of 220 million Euros converted based on the exchange rate on 1 December 2000 would be over US\$190 million. See FLO, 2.

⁸ Renard, 496.

⁹ Ransom, 49; Simpson and Rapone, 2000, 49-50, 55; Rice, 1998, 52-59; For an excellent account of the social and environmental devastation that the coffee industry, as well as the cotton, banana, and cattle industries, have brought to Central America, one of the world's key coffee-growing regions, see Faber, 1993.

¹⁰ For a discussion on the nature of the

historically specific capitalist market, see Meiksins Wood, 1999 and McNally, 1993.

¹¹ Renard, 485, 489-490, 495-498; Simpson and Rapone, 47, 50, 55; David Ransom is also aware of fair trade's position as a niche in the global market. However, he insists that fair trade cannot survive as a niche and that its message of social and environmental justice is a compelling one which promises to bring fair trade far beyond the limits of a market niche in the future. See Ransom, 28, 124.

¹² Mick Blowfield, 1999, 760-761; Renard, 490.

¹³ Simpson and Rapone, 47-48, 54; Ransom, 22.

¹⁴ Renard, 497.

¹⁵ Ransom, 108.

¹⁶ Blowfield, 766.

¹⁷ Renard, 497.

¹⁸ FLO.

¹⁹ Renard, 498.

²⁰ FLO, 11.

²¹ Ransom, 108-109.

²² E.P. Thompson, 1971, 136.

²³ Thompson; Wood, 58.

²⁴ McNally, 199-200.

²⁵ Simpson and Rapone, 50, 52-53; Renard, 497.

²⁶ Global Exchange, "Squeezing Coffee Farmers to the Last Drop," October 2001, available at http://www.globalexchange.org/economy/coffee.

²⁷ Simpson and Rapone, 54.

²⁸ McNally, 199-200.

²⁹ Barratt Brown, 63; Ransom, 22, 109; Simpson and Rapone, 47-48, 51, 54-55.

³⁰ Elson, 1988, 16-17.

³¹ Global Exchange, "Consumers' Wish for a Proven Alternative to Sweatshop Coffee Will Come True When Starbucks Launches 'Fair Trade Certified' Coffee October 4," 22 September 2000, available at

http://www.globalexchange.org/economy/coffee/pressrelease092200.html; Patrick McMahon,

"Cause coffees' produce a cup with an agenda," USA Today, 26 July 2001.

³² Global Exchange, "Kick the Can!!: Protest Exploitation of Farmers Nationwide Day of Action Against Folgers," 15 December 2001, available at

http://www.globalexchange.org/economy/coffee/folgers.html.

³³ Naomi Klein, 2000, 397-401.

³⁴ Simpson and Rapone, 53.

35 Hans Bolscher, 2002.

³⁶ For examples of Starbucks poor record with unionized labor, see

www.mojosdailygrind.com/news/starbucks.html. ³⁷ Waridel, 2002, 105-106.

³⁸ Klein, 435-436. ³⁹ Ibid., cited on p. 428.

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