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## Accountability Arrangements in Non-State Standards Organizations: Instrumental Design and Imitation

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### Abstract

This article analyses accountability arrangements in the Forest Stewardship Council (FSC) and other organizations that set standards for certification and eco-labeling. It focuses on two types of accountability that are likely to be achievable and important to non-state standards organizations: control and responsiveness. In setting a global standard based on a multi-stakeholder governance structure, FSC established a model for other certification schemes, specifically within the forestry and fisheries sectors. By creating the Marine Stewardship Council (MSC), FSC-supporters exported the certification model to the fisheries sector. Industry-led forest certification schemes that were initiated to compete with FSC and offer an industry-dominated model have come to mimic procedural accountability arrangements initially established by their competitor. However, they have carefully filtered out the prescriptions that could reduce their influence in standard-setting processes. The article argues that while certification schemes could enhance control of corporate environmental and social performance, some of the industry-dominated schemes adopt popular and fashionable accountability recipes to divert criticism of their activities instead of acting responsively to external constituents such as environmental and social groups.

*Keywords:* accountability, certification, eco-labeling, governance, institutions, private authority, standards

## Introduction

Over the past two decades, a number of non-state organizations have been created to set standards for certification and eco-labeling in farming, fishing, forestry, tourism, coffee production, mining and other industries. The creation of standards organizations could be seen as efforts by civil society organizations or industry associations to hold companies accountable for their environmental and social performance or non-performance. A certificate from a credible organization may boost sales of approved products and reassure relevant constituents and market players that a company is taking responsibility for its conduct.

Yet it is not clear if standards organizations claiming to take responsibility for public goods or public welfare are answerable only to their own members or to the general public. These organizations make rules that responsible companies are expected to follow, but the organizations examined in this paper neither have a government mandate to make rules nor to represent the general public. Accredited certification bodies monitor compliance with rules and can penalize non-compliant companies by suspending their certificates, but officially they are not authorized by governments to verify and enforce compliance. In the absence of the exclusive rule-making authority of the state, non-state standards organizations therefore depend on the voluntary participation of companies and must respond to pressures to be accountable to all stakeholders they claim to represent. This article explores how these organizations *organize* rule-making and governance to enhance accountability and why they choose one organizational mode above another. The organizational focus enables a critical analysis of the framing, operationalization and transformation of accountability within and among organizations operating in particular institutional environments (cf. Boström and Garsten, 2008).

In addressing these issues, I look at standards organizations in the forestry and fisheries sectors, as initiatives in these two sectors arguably represent the most advanced cases of non-state rule-making and governance in the environmental realm. Both sectors have seen the emergence of quite demanding certification schemes that have attracted participation from a number of forest owners and fisheries on a voluntary basis. The article draws on primary research of certification and labeling in these sectors conducted over several years (2000—2006), including interviews with representatives of standards organizations, industry associations, environmental organizations and government agencies; written material such as standards, certification reports and policy documents; and secondary literature on certification and labeling.

The article proceeds in four steps. I first examine two theoretical approaches to analyzing accountability arrangements and two types of accountability that may be achievable to standards organizations. This is followed by the empirical investigation of accountability arrangements in forest and fisheries standards organizations and certification schemes. Next, I discuss whether standards setting and certification have resulted in more or less accountability, taking into account the implications of different ways of looking at those arrangements. The conclusion reflects on some of the wider lessons suggested by this particular study of accountability arrangements in forest and fisheries standards organizations.

## Theoretical Approaches

Two theoretical approaches have guided the analysis of accountability arrangements in non-state standards organizations. The first stresses the rational and instrumental aspects of organizational design, while the second points to the salience of institutionalized norms and values in organizations' environments.

### ***Instrumental Organizational Design***

The rational approach to organizations draws on different schools of thought, including Taylor's scientific management, Fayol's administrative theory and Weber's theory of bureaucracy. This approach sees organizational recipes as tools for managers to rationally design effective, efficient and accountable organizations (Scott, 2003).

According to the traditional notion of democratic accountability, rulers in liberal democracies are accountable to citizens through some mechanism of representation, among them elections, right of legislators to scrutinize and hold public servants to account, and public answerability of governmental agencies and officials. In the political sense, accountability is '[t]he requirement for representatives to answer to the represented on the disposal of their powers and duties, act upon criticisms or requirements made of them, and accept (some) responsibility for failure, incompetence, or deceit' (Bradbury, 2003). Consequently there are certain tasks or functions which people in a position of authority are obliged to perform, and for whose performance they are answerable to some other person or body (cf. Mulgan, 2000; Thomas, 2003).

In the absence of public delegation of authority, non-state standards organizations are not directly answerable to public authorities. Rosenau (2000: 192) observes that there is likely to be an 'accountability deficit' in governance dominated by nongovernmental organizations (NGOs), because it is not clear to whom these organizations are responsible or answerable. Similarly, what Rhodes (1997, 2000) sees as a lack of accountability within inter-organizational, self-organizing networks, derives, he argues, from their resistance to state intervention and democratic control. It is impossible, he contends, to identify any particular individual or organization within the networks as being fully responsible. From the perspective of popular democratic control, Dahl (1999) criticizes international organizations for being unrepresentative and unaccountable compared to liberal democratic nation states. The verdict would obviously be worse for transnational standards bodies with no governmental mandate to regulate and enforce rules. For Cutler et al. (1999: 19) 'private authorities' such as transnational standards organizations must be empowered by – and by extension be answerable to – governments or international organizations granting them the right to make decisions for others. The difficulty in establishing a body in a position of authority and a collective that exercises political rights beyond the state is potentially a limitation on the democratic accountability of all multilateral organizations and transnational governance schemes (cf. Bernstein, 2005: 151–2). The problem is that there is no global *demos* – a collective exercising political rights beyond the state – representative of all those affected by the policies of states, multilateral organizations and corporations (Grant and Keohane, 2005).

Accountability structures in non-state standards organizations cannot therefore simply replicate those in representative democracies, but standards organizations can establish alternative structures that may be more effective in enhancing *transnational* accountability. To be sure, there are a number of different conceptualizations of accountability (Romzek and Dubnick, 1987, 1994; Dubnick, 1998; Bovens, 1998; Behn, 2001; Koppell, 2003), but I will focus on two types of accountability that are likely to be particularly important to standards organizations. These are supplementary rather than mutually exclusive, and both types may operate at the same time in a given accountability relationship. The first is *accountability as control*, meaning here that there must be some kind of external scrutiny of those being held to account, as some scholars insist must be at the core of an accountability relationship (see Mulgan, 2000). In the context of transnational standard setting, control with companies adopting the standards could be achieved by accreditation of independent certification bodies, auditing of compliance with standards, and

rewards for performance and sanctions for non-performance. Delegation of the auditing function to third-party certification bodies is a key feature of most organizations that set standards for certification. Those certification bodies need to be accredited by and are answerable to the standard setter. Certification bodies issue certificates to companies that comply with the standards, audit performance through regular inspections, and may penalize non-compliant companies by suspending their certificates. Producers that voluntarily grant certification bodies authority to verify compliance with rules must accept the consequences of non-compliance. In these ways, companies that opt to participate in certification schemes are held accountable for their performance to the certification bodies and ultimately to the standards organization. Holding companies accountable to certification bodies is based on changing the utility that corporate actors assign to behavioral options, that is, by rewarding rule-following and compliance by issuing a certificate that signals responsibility and penalizing non-compliance by revoking the certificate.

The second type of accountability that is likely to be achievable for non-state standards organizations is that of responsiveness. The notion of *accountability as responsiveness* turns attention to the relationship between the standards organization and various stakeholders such as clients, NGOs, the business community, governments and multilateral organizations. Like public agencies have to be responsive to the needs or demands of clients, 'customers' or the general public, standards organizations are expected to be responsive to stakeholders and manage the diverse expectations generated *outside* the organizations (cf. Romzek and Dubnick, 1987, 1994). For power wielders it means seeking to meet the expectations of relevant constituencies, accepting answerability on the disposal of their power, and acting upon criticisms or demands made of them. As Koppell (2003: 180) notes, 'responsiveness turns accountability outward rather than upward'. Organizational capacity for responsiveness to clients and 'external' constituents could be enhanced by instrumental organizational design such as including relevant groups in the standard-setting process, consultation with stakeholders in certification proceedings, transparent decision-making, opportunities for complaints, and procedures for dispute resolution (cf. Gulbrandsen 2004, Pellizzoni, 2004; Boström, 2006).

Romzek and Dubnik (1987: 229) observe that in public administration the primary question then becomes, 'Whom does the public administrator represent?' In other words, we need to ask to whom is the standard setter itself accountable. From the rational-instrumental perspective we would expect to see the standards organization enhancing responsiveness to those clients and constituents *it defines as salient* and *claims* to represent. For example, including environmental, social and industry representatives in the standard setting process and on the governing bodies of a standards organization could enhance responsiveness to a broad range of constituents, whereas industry domination of standard setting and governing bodies would primarily enhance responsiveness to business clients and business constituents.

In sum, the instrumental approach highlights the organizational design of standards organizations, the assignment of obligations and rights, and organizational performance and results. Accountability is assessed in terms of the results an organization achieves or delivers. We can therefore expect accountability recipes with wide acceptance and use to have been judged as instrumental in enhancing control of company performance and/or increasing the standards organization's responsiveness to the stakeholders it defines as important and claims to represent.

## *Institutional Environments*

From the institutional environments perspective, organizations adopt a certain language and certain procedures because the actions of an entity must be acceptable or appropriate within a certain institutional framework (Meyer and Rowan, 1977). Institutionalized norms in organizations' environments define appropriate and inappropriate behavior, prescribe and proscribe courses of action, and legitimate particular organizational recipes. It is essential, therefore, for accountability arrangements to be considered legitimate by relevant stakeholders and constituencies. Legitimacy can be seen as 'a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions' (Suchman, 1995: 574). Unlike traditional state authority, which in itself most often is taken for granted, a non-state standards organization must obtain legitimate rule-making authority from and accept answerability to salient constituencies in its *organizational field*, that is, 'those organizations that, in the aggregate, constitute a recognized area of institutional life' (DiMaggio and Powell, 1983: 148). It means that the standards organization cannot itself decide whether a certain constituent is important or not, but has to interact with and seek to meet expectations from disparate field constituents. Although there is no global *demos* exercising political rights, there are transnational networks of international and non-governmental organizations, researchers, activists, consultants, the media and others that are said to constitute a 'world polity' (Boli and Thomas, 1999), 'world society' (Meyer et al., 1997; Meyer et al., 2006) or 'global public domain' (Ruggie, 2004) with a certain culture and significant influence on the formation, transformation and flow of organizational ideas. Specifically, ideas and ideals about new modes of governance are often created, mediated and disseminated transnationally by organizational 'carriers' such as business consultants, NGOs or the media. These carriers are fundamentally changing the institutional rules of the game for organizations operating in a transnationalizing world (Djelic and Sahlin-Andersson, 2006).

From this perspective, particular accountability recipes and prescriptions could be seen as 'rationalized myths' that spread rapidly in both public and private institutions (cf. Meyer and Rowan, 1977). *Myths* are widely held belief systems and cultural frames that are imposed on or adopted by organizations. They are *rationalized* because they prescribe certain ways of organizing and 'take the form of rules specifying procedures necessary to accomplish a given end' (Scott, 2003: 137). As Scott (2001: 78) observes, '[t]he development of standards and standardization processes constitutes a clear instance of institutionalized normative and cultural carriers'. Adopting specific accountability recipes may therefore be crucial for legitimizing behavior but may do little to increase control over those adopting standards or to enhance the responsiveness of the standards organization. Accountability arrangements to enhance *control* such as obligations to report performance and have compliance with standards verified could be seen as rituals aimed at justifying conduct or the 'business-as-usual' situation (cf. Power, 1997, 2003). Consultation with stakeholders in standard-setting processes and some degree of transparency may look like improved *responsiveness* to a wide range of stakeholders and constituents in the absence of actual progress in response to criticism.

The effects of rationalized myths on the creation of accountability structures and procedures are institutional imitation and convergence (cf. DiMaggio and Powell, 1983). As Brunsson (2000: 141) reminds us, however, imitation may fail to achieve the intended similarity for several reasons, and imitation is often mixed with innovation because the imitator is not interested in perfect imitation and wants to add her own ingredients. While early neoinstitutional work (e.g. Meyer and Rowan, 1977, DiMaggio and Powell, 1983) tended to see organizations as

adapting rather passively to rationalized myths, more recent work has found evidence that organizations adapt and transform myths and innovate to create institutional change (e.g. Sahlin-Andersson, 1996; Sevón, 1996; Brunsson and Jacobsson, 2000; Sahlin-Andersson and Engwall, 2002; Røvik, 2002).

In sum, the institutional environments perspective highlights the importance of organizational recipes about appropriate ways of organizing for accountability. The success of an organization is judged from its ability to adapt to popular organizational ideas and recipes, which in turn are legitimized by institutionalized norms and values. Consequently, a successful accountability recipe can be expected to be consistent and aligned with salient norms and values in an organization's institutional environment. Popular organizational accountability recipes may or may not enhance control and responsiveness, but as long as the organization adopts those recipes it is deemed successful by external audiences.

## **The Comparative Case Study: Forest and Fisheries Certification**

Forest and fisheries standards organizations evolved out of concerns about resource depletion and insufficient governmental action in the 1990s, although it was a forestry initiative that sparked the process. In the following, I examine (1) the formation of these non-state standards organizations; (2) organizational design and change; and (3) the way the auditing function is performed by independent certification bodies.

### ***The Formation of Non-State Standards Organizations***

The Forest Stewardship Council (FSC) was founded in 1993 by the World Wide Fund for Nature (WWF), other environmental groups, a few timber traders, indigenous peoples' groups, forest worker organizations and other stakeholders in response to global forest degradation, irresponsible industrial logging, and governments' lack of willingness or ability to address the problems. FSC developed a global standard for its definition of 'well-managed forests' made up of a set of principles and criteria for environmentally appropriate, socially beneficial and economically viable management of forests.<sup>1</sup> These principles and criteria must be adapted to meet conditions in different countries through a process in which ecological, economic and social stakeholders collaborate. Nationally or regionally developed standards are approved by the FSC board of directors if they conform to the scheme's global principles, criteria and decision-making rules.

Primarily as a result of the overcapacity in the world's fishing fleets following years of expansion, overfishing that depletes fish stocks and habitats within national waters as well as in the high seas remains the most serious problem in marine fisheries management. In response to the global fisheries crisis, WWF in 1996 teamed up with the global corporation Unilever, one of the world's largest purchasers of frozen fish, and established the Marine Stewardship Council (MSC) in 1997 to improve fishery practices and create a tighter link between producers and buyers. Like the FSC standard-setting process, MSC developed prescriptive sustainable resource management standards through an open and inclusive consultation process, including eight workshops in different regions of the world and two expert drafting sessions. The principles and criteria of MSC build on the 1995 UN Food and Agriculture Organization (FAO) Code of Conduct for Responsible Fisheries. While FSC seeks to establish a global standard for well-managed forests in the absence of multilaterally agreed forest law, MSC essentially aims to enhance compliance with existing multilateral and domestic fishery regulations and improve fishery practices through setting supplementary management standards. The divergent roles of

FSC and MSC are related to differences in the way the forest and fishery resources are governed (Gulbrandsen, 2005). Forests are national resources governed by domestic authorities and private owners. By contrast, marine fish stocks tend to be common pool resources managed by governments via international or regional fisheries agreements and there is little scope for non-state authorities like MSC to influence multilateral fisheries management rules.

While MSC thus far is the only multi-criteria certification and labeling scheme for wild-caught fisheries all over the world, FSC has been challenged by a number of industry-dominated forest certification schemes. Displeased with the stringency of FSC criteria, national forestry interest groups and industry associations around the world responded by establishing competing schemes to create more flexible and discretionary certification standards and regain control over the issue area of forest governance. The question is, then, why competitors to MSC have not yet emerged in the fisheries sector. One reason could be the fact that while a number of forest product retailers have made certification a requirement of business contracts with suppliers, certification is still not a prerequisite for access to most markets for fish and fisheries products (Gulbrandsen, 2006). Another explanation could be differences in the way that MSC and FSC are governed, arguably leaving business interests with greater influence in MSC than in FSC. This is explored in the next section.

### ***Organizational Design and Change***

FSC has a tripartite decision-making structure consisting of social, environmental and economic chambers that make up the General Assembly – the highest decision-making body in the organization. Each chamber holds one-third of the votes and each chamber has voting parity between stakeholders from developing and developed countries. The chambers each elect three representatives for a three-year term to the board of directors, which is accountable to FSC members. This structure is designed to ensure that no specific interests are allowed to dominate rulemaking in the scheme. FSC is an open membership organization, incorporating organizational and individual members, through their participation in the General Assembly, and a number of national initiatives within its global network. However, because FSC was created in response to the lack of results from intergovernmental forest negotiations, its regulations prohibit the participation of state agencies in national standard development initiatives as well as in the organization itself (Gulbrandsen, 2004).

The creation of MSC in 1997 was directly inspired by FSC's success. WWF staff learned informally of the FSC certification model from their colleagues, considered its application to fisheries, and decided to create a similar model for fisheries certification in partnership with the multinational corporation Unilever (Fowler and Heap, 2000; May et al., 2003). Designing the scheme, WWF and Unilever mimicked several of the accountability structures in FSC, including extensive stakeholder consultation in standard development and certification processes, accreditation of certifiers and independent auditing, but decided against an open membership organization like FSC to avoid cumbersome and inefficient decision-making procedures (Fowler and Heap, 2000). These two partners devised MSC's governance structure themselves, though stakeholders were consulted.

Unlike FSC, MSC states that its role is to work alongside and complement existing intergovernmental regulations, not replace or supplant them. There is a long history of multilateral governance in the fisheries sector and a range of legally binding rules, centered on the 1982 Law of the Sea Convention. MSC operates within this regulatory framework. Anchoring the MSC principles and criteria in the FAO Code of Conduct for Responsible Fisheries was

clearly a strategy to enhance the legitimacy of a private certification scheme operating in a dense regulatory context and to reassure governments that MSC-initiators did not seek to establish a competing non-state regime to the elaborate international fisheries regimes.

However, given Unilever's involvement as a global corporation in MSC's inception, rather than the wide range of stakeholders preferred by FSC, MSC courted controversy from the start (Constance and Bonanno, 2000: 131). To fend off assertions of WWF and Unilever control and domination, MSC re-emerged in January 1999 as a fully independent, non-profit organization. It was seen as an essential step to regain credibility as a neutral body in a multi-stakeholder industry (Fowler and Heap, 2000: 141). The set up of MSC as an independent organization also meant that instead of being financed by WWF and Unilever it had to source its own funding from a range of private organizations and charities such as the Packard Foundation and from logo (eco-label) license agreements with certified fisheries.

Notwithstanding this move to enhance the autonomy of MSC, both environmental and fishing industry stakeholders were concerned over what they claimed was lack of transparent and inclusive decision-making in the organization. Following a ten-month governance review and consultation process, MSC in 2001 announced a governance reform to enhance responsiveness to various stakeholders within and outside the fisheries sector. The reform included the creation of a board of trustees, a technical advisory board, a stakeholder council, and national and regional working groups (MSC, 2001). Although the governance reform resulted in a multi-stakeholder governance structure, the highest decision-making authority was granted to the board of trustees, which is self-recruiting and functions much like a corporate board of directors, rather than to the stakeholder council. MSC wanted to prevent a governance arrangement that would be expensive to operate, unwieldy and open to potential capture by particular interest groups or stakeholders.<sup>ii</sup>

Since the governance reform, MSC has attracted increasing support from governments, the fishing industry, environmental NGOs, and corporate and charity funding sources. In 2000, after 15 months of assessment, Western Australia's rock lobster fishery became the first to be certified to the MSC standard. Since this milestone event, a number of major fisheries on a national or even global scale have been certified to the standard, including Alaska pollock, Alaska salmon, New Zealand hoki and South African hake. Whereas the MSC scheme thus far has only certified some three to four percent of the global marine catch for human consumption and cannot, therefore, be considered a key driver of fisheries sustainability on a global scale, it is a major player in the global whitefish market, certifying about one-fifth of the traded volume (Hoel, 2004), and it continues to grow.

In the forestry sector, industry and forest owners' associations responded to FSC by setting up competing schemes. This is related to the institutional setup and design of FSC, in particular the key role of WWF in the initiation of the scheme; the fact that the environmental and social chambers with a two-thirds majority can outvote the economic chamber; and the stringency and intrusiveness of prescriptive environmental and social rules (Cashore et al., 2004, Gulbrandsen, 2004). By contrast, the industry-dominated programs initially operated under the strongly held belief that those required to implement the rules for sustainable forest management (i.e. forest companies and forest owners) ought to develop them (Cashore et al., 2004). Nonetheless, the industry and forest owners' associations that established certification programs in opposition to FSC, have increasingly mimicked FSC's decision-making structure and certification model to enhance the credibility of their programs among buyers, retailers and environmental organizations. These organizational changes are, in part, a response to advocacy group pressure on industry-dominated schemes, who accuse them of unaccountability, lacking in transparency and stakeholder participation, and of rejecting public disclosure of certification

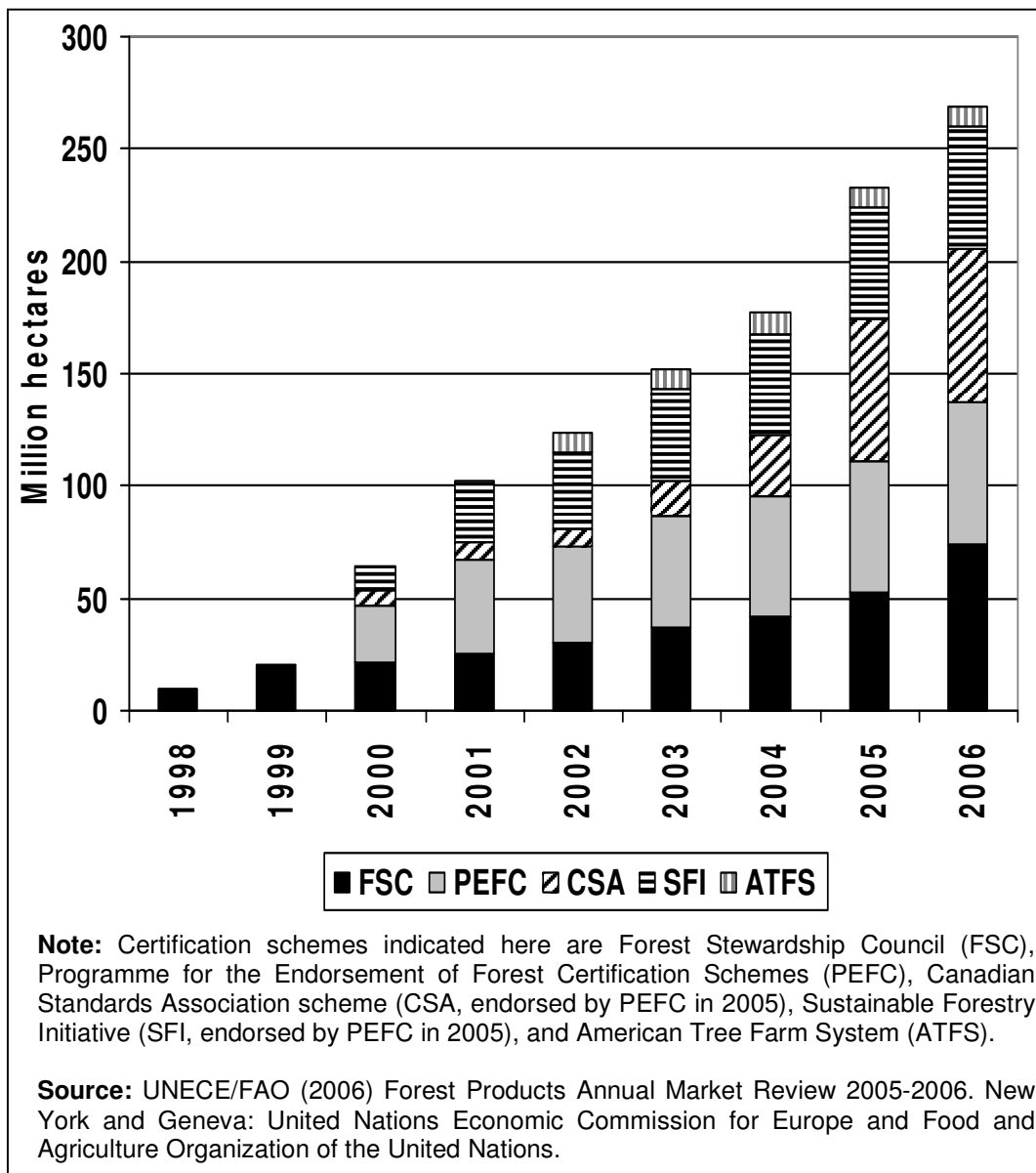
results (e.g. Ozinga, 2001, 2004; Vallejo and Hauselmann, 2001). Specifically, competition with FSC for legitimacy and rule-making authority forced the industry-based programs to accept some degree of scrutiny from and answerability to outside stakeholders (Cashore et al., 2004; Meidinger, 2006). The emergence of new global norms and principles on transparency, stakeholder democracy and business-NGO deliberation – frequently invoked by the critics of industry-led certification schemes – effectively limited the range of available options to organize accountability, making a FSC-style accountability model much harder to avoid.

In the United States, the American Forest and Paper Association in 2000 established the independent Sustainable Forestry Board to govern its certification program. This could be seen as a move to make certified companies accountable to stakeholders outside the forest industry. In 2002, the Sustainable Forestry Board completed its legal separation from the industry association by applying for non-profit status and changed its structure to mimic FSC's three-chamber system (Cashore et al., 2004). One-third of the Board members consist of conservation and environmental organization representatives (e.g. Nature Conservancy and The Conservation Fund), one-third represent members from the industry association, and the remaining one-third is drawn from the broader forestry community such as forestry research institutes and trade associations.<sup>iii</sup> Notwithstanding the forest certification scheme's legal separation from the American Forest and Paper Association, however, the industry association and other forestry interests retain a prominent place on the Sustainable Forestry Board (with two-thirds of the board members) and the lack of consultation and public information in the certification process mean that the industry-dominated scheme is less inclusive and transparent than FSC (cf. Ozinga, 2004; Nussbaum and Simula, 2005).

Similarly, while the Programme for the Endorsement of Forest Certification schemes (PEFC), created in 1999 by European forest owners' associations, has opened up for some participation of interested stakeholders outside the forestry community, forest landowners still dominate rule-making and governance. The PEFC regulations explicitly state that development of certification standards at the national level 'shall be initiated by national forest owners' organizations or national forestry sector organizations having the support of the major forest owners' organizations in that country' (PEFC, 2005: 3). All relevant stakeholders shall, in principle, be invited to participate in the standard-setting process, but in practice many NGOs decline to participate because the forest owners' organizations dominate rule-making. In Sweden, for example, the national PEFC council has mimicked FSC's tripartite decision-making structure, but instead of representing ecological, social, and economic interests the chambers comprise forestry, primary processing industry, and other interests.

Figure one shows that the certified forest area worldwide increased steeply from 1998 to 2006. The certified forest area in 2006 totaled 270 million hectares, which is about seven percent of the global forest area, but only 13 percent of the certified forest is in developing countries (UNECE/FAO, 2006).

**Figure 1:** Forest area certified by major certification schemes, 1998–2006.



### *Independent Auditing by Certification Bodies*

Forests and fisheries are different resources with different management requirements; while auditors can assess forests relatively comprehensively, it is more difficult to estimate the condition of straddling and highly migratory fish stocks. Yet certification of forests and fisheries is based on similar ideas. The delegation of the auditing function is a key feature of most certification schemes. While the standard-setting body develops rules and accreditation requirements, the actual certification of applicants is carried out by independent certification bodies.

In the case of MSC, a fishery has to go through a confidential pre-assessment to determine whether a fishery can proceed to a full assessment. In a full assessment, the certifier appoints a panel made up of a fishery stock assessment expert, an ecosystem expert, and a fishery management expert who ascertain whether a fishery meets the MSC certification requirements. The process offers stakeholders considerable leverage and provides a number of checks and balances to enhance accountability, but certification can be time consuming, costly and demanding for the fishery undergoing assessment.<sup>iv</sup> For example, the certification of Alaska pollock, by far the largest certified fishery in the world, lasted over four years.

The principles and criteria of FSC embody relatively stringent performance-based standards, and require on-the-ground field inspections. To discourage certifiers from favoring applicants in certification audits, FSC reviews selected audits by certifiers and can suspend and revoke certification authority if serious breaches with standards are disclosed (Meidinger, 2006: 72). FSC also requires certifiers to disclose certification and audit reports to the public and to issue summaries of the reports. By contrast, the landowner and industry-dominated schemes are generally reluctant to bring stakeholders on board and to allow complaints in the certification process (Ozinga, 2004; Nussbaum and Simula, 2005). Not all schemes require on-the-ground field inspections of forestry operations and environmental performance, focusing instead on the management system of forest companies. This was initially the preferred approach of the forest owner and industry-led European and American schemes, but as a result of competition with FSC for credibility and legitimacy they have introduced some performance-based elements in the operation of the schemes. Similarly, several schemes that used to have lax or no auditing requirements have introduced more demanding auditing procedures to enhance control over those adopting the standards. For example, the Sustainable Forestry Initiative was initially an industry code of conduct created by the American Forest and Paper Association 'to visibly improve industrial practices and report results' (AF&PA, 2002: 3). In 1998, the industry association restructured the program to create a certification standard for its members. Most of the large member companies in the association have now undergone or committed to third-party auditing (Cashore et al., 2004). While most of the industry-dominated schemes now also allow some stakeholder involvement in the standard-development process, the certification process itself, surprisingly, is rather closed off to outside stakeholders. Many schemes do not publish certification and audit reports or other meaningful information about on-the-ground environmental performance of forest companies. According to one prominent forest conservation NGO, the industry-led Sustainable Forestry Initiative certifies 'near status quo' forestry practices and is 'one of the least credible of all [forest certification] schemes' owing to its lax environmental standards and lack of transparency (Ozinga, 2004: 23).

The upshot is that while certification bodies are entrusted with much power and discretion, requirements regarding transparency and opportunities for stakeholder participation in certification and complaints proceedings, control mechanisms, and stringent standards work to hold them and the companies they certify accountable to the standards organizations as well as to outside stakeholders. These accountability structures are most developed in FSC and MSC, whereas certification proceedings in industry-dominated schemes tend to be less demanding, transparent and open to outside stakeholders.

## **Instrumental Design and Imitation**

Through its tripartite decision-making structure and open membership policy FSC created a capacity and commitment to be responsive to a wide range of economic, social, and

environmental stakeholders. The FSC model of organizing for accountability has spread to other non-state standards organizations, specifically within the fields of forestry and fisheries. It has been observed that modern societies celebrate and try to imitate organizations that are seen as particularly innovative, creative, effective, and successful (DiMaggio and Powell, 1983, 1991; Sevón, 1996; Røvik, 2002). The success of FSC in attracting widespread support among market players and social movement organizations (Gulbrandsen, 2006) has legitimized and authorized a particular accountability recipe based on participation of a wide range of parties, shared decision-making authority, and empowerment of those affected by the actions of power-wielders. This recipe in turn incorporates and is reinforced by prescriptions about appropriate ways of organizing in modern society and widely held norms and beliefs about transparency, corporate social responsibility, stakeholder democracy, and deliberation between business and civil society. By creating the FSC and exporting the multi-stakeholder certification model to the fisheries sector, the WWF has been a prominent carrier of the FSC-style accountability recipe.

Organizational prescriptions and institutionalized norms and beliefs limit the range of available options in the organizational field (DiMaggio and Powell, 1983, 1991; Scott, 1991), implying that standards organizations choose among a limited range of acceptable or appropriate ways of organizing for accountability. It is evident that standards organizations are adapting to popular organizational recipes by becoming increasingly professional and constituting themselves as independent of the actors that established them. Indeed, over time we see evidence of some degree of convergence and institutional *isomorphism*, the tendency towards organizational homogeneity (cf. DiMaggio and Powell, 1983). Although MSC decided not to adopt FSC's membership-based model, it mimicked several of FSC's accountability arrangements to enhance organizational capacity for responsiveness to a range of fisheries stakeholders. Interestingly, the industry-led forest certification schemes that were initiated to replace FSC and offer an alternative, industry-dominated certification model have come to support many of the same procedural requirements initially established by their rival (see also McNichol, 2006). This development corroborates the finding that organizations turn to more successful and prestigious actors for organizational models and recipes to imitate (DiMaggio and Powell, 1983), particularly when their earlier activities are questioned and criticized (Sahlin-Andersson, 1996, 2001; Sevón, 1996).

However, while industry-led forest certification schemes have mimicked FSC's accountability arrangements in various ways, in particular by consulting with external stakeholders and increasing the independence of their programs, they have acted strategically to maintain control of the standard-setting process. Rather than passively absorbing organizational ideas and recipes, they have adapted selectively to institutional environments by imitating certain ways of organizing while carefully filtering out the management prescriptions they did not like. The result is arguably a governance model that seemingly is open to stakeholder participation and based on consultation whereas it in fact restricts outside stakeholder influence in actual decision-making processes. Consultation with environmental groups and other stakeholders could be a way of justifying actions without needing to be answerable to stakeholders other than industry peers. It would do little to improve an organization's actual responsiveness to external audiences. Similarly, expanded monitoring and auditing activities may replace and undermine trust, resulting in ever growing demand for more monitoring and auditing (Power, 1997).

The spread of particular accountability arrangements appears to be driven more by expectations and demands in organizations' institutional environments than the instrumental function of these arrangements. Indeed, the adoption of new accountability tools and procedures can be seen as a way of 'organizing hypocrisy' or justifying the business-as-usual situation (cf.

Brunsson, 1993, 2002). For example, when actors cannot or will not implement radical on-the-ground changes in forest management to meet ideas and expectations about environmental protection in forestry, decisions can be taken, systems invented, and routines developed to justify or conceal behavior rather than changing behavior. All certification schemes are committed to the idea of sustainable forest management on paper, but while schemes such as FSC typically require on-the-ground changes in forestry management, several of the industry-dominated schemes are less ambitious and appear more geared towards justifying a business-as-usual approach by issuing a 'stamp of approval'. The emergence of forest certification programs may actually in some cases have resulted in less transparency and fewer opportunities for public scrutiny of forestry practices (Meidinger, 2006: 82). Now certified landowners and forest companies could simply point to the independent auditors who inspect and certify them, as a way of disarming outside criticism of their modes of operation. As a consequence, more accountability in terms of formal procedures and hierarchical control could result in less accountability in terms of responsiveness to external stakeholders and constituents.

It is not surprising, therefore, that despite efforts to strengthen the independence of industry-dominated schemes most environmental organizations have little confidence in them. Instead of endorsing the steps taken by those schemes to strengthen their independence, WWF and other environmental groups responded by intensifying campaigns to promote FSC in the marketplace.<sup>v</sup> The fact that FSC rivals were initiated by and still are accountable primarily to industry associations goes a long way to explain the environmentalists' lack of trust in them. Most environmental organizations consider the efforts of industry-dominated schemes to increase participation of environmental and social stakeholders in their governing bodies as moves to make them appear inclusive and independent without fundamentally altering responsiveness to environmental criticism or making it easier for environmental groups to influence rule-making and governance.<sup>vi</sup> They claim that whereas industry associations have accepted some participation from environmental and social groups in their standards organizations, those associations reserve for themselves the right to decide who is accountable to whom and for what. Accountability understood in this way could become a meaningless ritual of justifying conduct by answering only those questions that the answerable party has decided upon (Pellizzoni, 2004).

FSC's membership-based governance model enhances the capacity for acting responsively to a range of constituents. This helps explain why so many NGOs trust the scheme and reject the efforts of industry-dominated schemes to obtain support. On the other hand, what environmental and social groups call responsive behavior could seem irresponsible to industry associations and landowners. This is illustrative of the 'ambiguity of appropriateness' in complex situations involving multiple identities, actors or institutions (Christensen and Røvik, 2002). Many forest companies and forest owners are skeptical of FSC precisely because of its inclusiveness in rule-making and certification processes.<sup>vii</sup> In their opinion, environmental and social groups should not wield significant rule-making influence as long as these groups are not responsible for implementing the rules nor have to bear the costs of complying with them. They claim that the stringency and intrusiveness of FSC rules leaves them with little discretion and choice in forest management. And they cannot see why they should be accountable to outside stakeholders whose knowledge and experience of the challenges facing the forestry sector are partial at best, and who have no official mandate to regulate. The role of the WWF as carrier of the FSC-style accountability model and the lack of ownership felt by many forest owners to the scheme explain, in part, why forest owners associations and forest industries in many countries created industry-dominated schemes instead of joining FSC. Against this background, we can identify two distinct accountability arrangements in non-state standards organizations. In the first

the standards organization is primarily accountable to the industry associations that established the organization in the first place; in the second the standards organization is accountable to multiple environmental, social, and economic stakeholders. These two models have persisted despite steps taken by industry-initiated schemes to strengthen the independence of their governing bodies.

## **Conclusion**

Although accountability requires authority, it can be established and agreed upon by actors that, unlike principals and agents, have no previous hierarchical relationship to each other. In setting a global standard for accountability in non-state governance, FSC established a template for other standards organizations. FSC has organized accountability by requiring inclusiveness in standard development and on the governing bodies of the scheme, broad stakeholder participation, decision-making transparency, accreditation of third-party auditors, and public disclosure of certification and audit results. MSC and the industry-dominated certification programs in forestry have partly sought to imitate FSC's governance structure and mechanisms. As a result, a new form of governance has emerged, different from both traditional state regulations and various forms of industry self-regulations and voluntary measures. Non-state certification and labeling schemes are well positioned to achieve a high standard of 'accountability as control' relative to other governance experiments such as international codes-of-conduct and industry self-regulatory schemes, which do not involve prescriptive standards or third-party auditing of compliance.

The process of increasing the autonomy and inclusiveness of industry-dominated schemes is likely to be difficult to reverse and could in the long run enhance organizational capacity for responsiveness to outside constituencies. However, the industry-dominated forest certification schemes have thus far avoided adopting decision-making rules and structures that could reduce the influence of the forest industry in standard development and operation. This study shows that the flow of popular organizational recipes could result in the adoption of specific accountability arrangements which may do little to enhance responsiveness to external constituents. Indeed, we have seen that organizations may take advantage of popular, taken-for-granted recipes, which are associated with the modern organization and seen as preeminent ways of organizing for accountability, to divert criticism of their activities. By adopting certain procedural accountability arrangements, such as independent auditing of their activities, organizations can simply tell critics that their practices are approved by third-party auditors.

In conclusion, the study shows that while the instrumental design perspective explains why frontrunners introduce particular organizational arrangements, the institutional environments perspective explains why latecomers adopt similar arrangements. We see that there is a sequential process in which frontrunners like FSC and MSC introduce a new organizational model or tool because of its instrumental efficiency whereas latecomers tend to imitate particular features of the successful model or tool. Evidence suggests that the steps taken by industry-dominated standards organizations to enhance autonomy and inclusiveness in part serve to justify a business-as-usual situation and avoid building a capacity and commitment to be responsive to environmental and social groups. When studying and theorizing accountability, scholars need to pay attention to the possibility that the adoption of procedural arrangements to increase control of corporate performance in fact could result in less accountability in terms of responsiveness to those affected by the operations of companies and industries.

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<sup>i</sup> See the FSC website <http://www.fsc.org>

<sup>ii</sup> Interviews with MSC representatives, May 2006.

<sup>iii</sup> See the webpage of the Sustainable Forestry Board: <http://www.aboutsfb.org>

<sup>iv</sup> Interviews with MSC representatives, May, 2006.

<sup>v</sup> Interviews with WWF representatives, 2001 and 2003.

<sup>vi</sup> Interviews with representatives of WWF and Friends of the Earth in 2001, 2003 and 2005.

<sup>vii</sup> Interviews with representatives of forest owner's associations, forest industry associations and forest companies in Sweden and Norway in 2001, 2003 and 2005.