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Self-Regulation as a Nonmarket Strategy. An Exploratory Study on Mechanisms Transforming Firm's Nonmarket Environment

Agnieszka Majewska

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THÈSE DE DOCTORAT
DE L'UNIVERSITÉ PSL

Préparée à l'Université Paris-Dauphine

Self-Regulation as a Nonmarket Strategy.
An Exploratory Study on Mechanisms Transforming
Firm's Nonmarket Environment

Soutenue par

Agnieszka MAJEWSKA

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Gestion

Composition du jury :

Madina, RIVAL
Professeur des universités, CNAM
Présidente du jury - Rapporteur

Pascal, CORBEL
Professeur des universités, Université Paris-Saclay
Rapporteur

Mourad, ATTARCA
Maître de conférences, Université Versailles St-Quentin-en-Yvelines
Examineur

Lionel, GARREAU
HDR – Maître de conférences, Université Paris-Dauphine PSL
Examineur

Isabelle, BOUTY
Professeur des universités, Université Paris-Dauphine PSL
Directrice de thèse

L'Université Paris-Dauphine n'entend donner aucune approbation ni improbation aux opinions émises dans cette thèse. Ces opinions doivent être considérées comme propres à l'auteur.

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Index of abbreviations and acronyms

ADEME	French Agency for ecological transition – in French <i>Agence de la transition écologique</i>
CSR	Corporate Social Responsibility
EU	European Union
FCD	Federation of Retail and Distribution– in French <i>La Fédération du Commerce et de la Distribution</i>
ICPE	Installations Classified for Environmental Protection – in French <i>Installation classé pour l'environnement</i>
OECD	Organisation for Economic Co-operation and Development
MP	Member of Parliament
NGO(s)	Non-governmental organization(s)
Self-reg	Self-regulation

FRENCH SUMMARY OF THE DOCTORAL THESIS - RESUMÉ EN FRANÇAIS

Depuis plusieurs décennies, largement inspirés par Porter (1980, 1985), les chercheurs en stratégie s'intéressent à la manière dont les entreprises recherchent un avantage concurrentiel par les moyens directement liés à leur positionnement sur le marché. Cependant, l'environnement dans lequel évoluent les entreprises est constitué de composantes marchandes et politico-sociétales qui sont tout aussi déterminantes pour la réussite de leurs opérations commerciales et l'obtention d'un avantage concurrentiel. Par conséquent, un autre courant de recherche stratégique a émergé, considérant que les entreprises opèrent non seulement sur leur marché mais aussi sur ce que l'on appelle l'environnement hors-marché. Ce dernier devient de plus en plus important pour la formulation et la mise en œuvre de leurs stratégies. Le courant de recherche sur la stratégie hors-marché (Baron, 1995) a montré que les entreprises peuvent modeler leur environnement externe *via* de diverses activités.

Cela montre qu'une organisation peut agir sur son environnement en influençant des parties prenantes externes et des institutions (Scott, 2013). La stratégie hors-marché peut être définie comme un « schéma concerté d'actions d'une entreprise visant à améliorer sa performance en gérant le contexte institutionnel ou sociétal de la concurrence économique » (Mellahi et al., 2016 : 143).

Une stratégie hors-marché est importante pour gérer l'environnement institutionnel des entreprises est reconnue tant au niveau national qu'international (Keillor et Hult, 2004). Celle-ci est « à la fois une réponse institutionnelle et une adaptation stratégique » au contexte socio-politique (Greening et Gray, 1994 : 467). Une entreprise qui souhaite conserver son domaine d'activité peut engager une stratégie hors-marché proactive (Baysinger, 1984). Néanmoins, les chercheurs ont identifié plusieurs types de comportements définis comme : adaptatif, additif et transformatif (Dorobantu, Kaul, and Zelner, 2017), ou encore conformité, évitement et contournement (Salorio, Boddeyn, and Dahan, 2005). Ainsi, le concept d'activités politiques des entreprises inclut l'utilisation ou la non-utilisation délibérée de l'influence et de la résistance vis-à-vis des acteurs hors-marché.

La stratégie hors-marché est généralement associée à l'interaction d'une entreprise avec des décideurs politiques, même si les institutions sociales, telles que les médias et les groupes d'intérêt, se sont progressivement imposées comme des acteurs politiques influents

(Breitinger et Bonardi, 2016 ; McDonnell et Werner, 2016). Le législateur et le gouvernement sont des acteurs centraux de l'environnement hors-marché, tandis que les entreprises sont reconnues comme des acteurs politiques de premier plan (Rasche, 2015 ; Scherer, Palazzo, et Matten, 2014). Par conséquent, la recherche sur les stratégies hors-marché s'est d'abord concentrée sur les institutions publiques et sur la manière dont les entreprises peuvent influencer les décideurs politiques.

En outre, les chercheurs distinguent deux types de stratégies hors-marché, à savoir les politiques publiques et les politiques privées (Baron, 2001). Hillman et Hitt (1999) ont identifié trois stratégies politiques principales : informationnelle, financière et relationnelle, qui correspondent aux activités telles que le lobbying, le financement des campagnes politiques ou la création de groupes d'intérêts. Cependant, une autre catégorisation peut s'appliquer dans les régimes démocratiques, où la doctrine de la séparation des pouvoirs divise les institutions publiques en trois branches : législative, exécutive et judiciaire. En dehors des activités menées en direction des acteurs politiques ou administratifs, il existe un potentiel non négligeable dans le développement de comportements stratégiques dans l'arène juridique (Casarin, 2015).

Au contraire, la politique privée recouvre les activités des entreprises qui tentent d'influencer l'activité économique sans s'appuyer sur les institutions publiques (Egorov et Harstad, 2017). De même, d'autres groupes d'intérêt peuvent mener des actions de politique privée, par exemple des boycotts ou des critiques dans les médias (Breitinger et Bonardi, 2016 ; Soule, 2012). Dans la pratique, la prolifération des nouvelles politiques publiques va de pair avec la croissance des initiatives privées, telles que la participation à des associations sectorielles ou à des groupes de gouvernance multipartites axés sur les produits (*e.g.*, Forest Stewardship Council, Marine Stewardship Council), l'élaboration et la mise en œuvre de normes (par exemple, les normes ISO), l'établissement de codes de conduite et de programmes de partage des meilleures pratiques, *etc.*

L'autorégulation peut être ajoutée à cet ensemble comme une autre forme de politique privée. L'autorégulation est définie comme un « système de régulation dans lequel la cible de la régulation (...) s'impose à elle-même des commandes et des conséquences » (Coglianese and Mendelson, 2010: 151). En d'autres termes, l'autorégulation désigne un engagement unilatéral et volontaire de l'entreprise à adopter un comportement contraignant. L'autorégulation est en effet un outil de régulation et politique privée (Porter et Ronit, 2006).

Les tentatives d'autorégulation des entreprises sont courantes et répandues. Ainsi, de nombreuses initiatives d'autorégulation voient le jour à différents niveaux pour compléter les lois et les normes en vigueur. De multiples initiatives ont vu le jour au niveau mondial (par exemple, *The United Nations Global Impact*, *The Global Reporting Initiative*, *The Business Principles for Countering Bribery*) ou dans des secteurs spécifiques (par exemple, le programme *Responsible Care*). L'autorégulation de l'industrie a suscité un intérêt particulier, car elle est considérée comme plus avantageuse que les autres types de réglementation, notamment pour résoudre les problèmes d'action collective, par exemple le *free riding* ou la coordination (King et Lenox, 2000 ; Lenox, 2006). Par conséquent, les analyses de l'autorégulation dans le domaine de la gestion sont ancrées à différents niveaux : l'entreprise (niveau organisationnel), l'industrie (niveau du secteur), la chaîne de valeur (initiatives multisectorielles) et la société (initiatives mondiales).

L'autorégulation collective et les actions entreprises au niveau sectoriel ont été largement étudiées dans le contexte de l'Union européenne (Héritier et Eckert, 2008, 2009 ; Molina, 2014) et dans le monde (Dashwood, 2014 ; Gunningham, 1995 ; King et Lenox, 2000 ; Marx, 2008). Diverses industries, telles que l'alimentation et les boissons, les soins de santé, la publicité, l'exploitation minière, la sylviculture et la pêche maritime, ont eu recours à des processus d'autorégulation pour régir les pratiques industrielles (Sharma, Teret, et Brownell, 2010). L'autorégulation sectorielle est définie comme "un processus réglementaire par lequel une organisation au niveau de l'industrie, par opposition à une organisation au niveau du gouvernement ou de l'entreprise (telle qu'une association commerciale ou une société professionnelle), fixe et applique des règles et des normes relatives à la conduite des entreprises de l'industrie" (Gupta et Lad, 1983 : 417).

La recherche dans le domaine de gestion fournit quelques arguments pour conclure que l'autorégulation est une stratégie hors-marché. Cependant, cette perspective attire peu d'attention (Pereira dos Passos et al., 2022) et les études manquent de compréhension détaillée sur ce phénomène. Généralement, l'autorégulation est considérée comme une action volontaire visant à éviter une politique gouvernementale coercitive (Maxwell et al., 2000 ; Solomon, 2010). *De facto*, c'est le principal argument pour considérer l'autorégulation comme une stratégie hors-marché. Dans une perspective d'économie néo-institutionnelle, l'autorégulation est présentée comme une stratégie hors-marché proactive et additive (Dorobantu, Kaul et Zelner, 2017). En revanche, d'autres chercheurs qui ont réalisé des revues

systematiques sur le sujet de stratégies hors-marché n'ont pas identifié l'autorégulation comme telle (Gorostidi-Martinez et Zhao, 2017 ; Mellahi et al., 2016 ; Wrona et Sinzig, 2018).

Comme indiqué précédemment, une stratégie hors-marché est essentielle aux entreprises pour acquérir un avantage concurrentiel. En tant que forme spécifique de stratégie hors-marché, l'autorégulation recouvre trois principaux avantages : le contrôle stratégique, la réputation, les avantages résultant du réseau et l'apprentissage (Bowen, 2019). Néanmoins, l'engagement dans une action collective exclut la possibilité d'obtenir un avantage relatif sur ses concurrents, car elle vise à fournir des avantages à tous les participants. Le maintien d'un avantage concurrentiel à long terme nécessite des ressources et des compétences difficiles à imiter par les entreprises rivales. Par conséquent, dans cette étude, c'est le niveau organisationnel de l'autorégulation qui est observé plutôt que le niveau sectoriel, et l'autorégulation de l'industrie ne retiendra pas notre attention dans des recherches ultérieures.

S'il ne fait aucun doute que l'autorégulation peut modifier l'environnement hors-marché, les études actuelles sont cependant encore insatisfaisantes quant à la compréhension détaillée de comment ceci est effectué (Dorobantu, Kaul, & Zelner, 2017). L'autorégulation mobilisée comme une stratégie hors-marché reste une « boîte noire » (Whitley, 2008). Ces études manquent en particulier d'une compréhension approfondie de la manière dont une entreprise modifie le comportement des autres acteurs par le biais d'un engagement volontaire. Finalement, malgré les indications dispersées dans la littérature, que nous présentons dans cette recherche, il reste encore à mieux comprendre comment l'autorégulation conduit à la transformation d'un environnement hors-marché complexe puisque son potentiel stratégique non marchand et les forces déclenchées ne sont pas apparents au premier coup d'œil.

En conséquence, notre étude explore l'autorégulation du point de vue de la stratégie hors-marché et vise à révéler le lien entre l'autorégulation et les changements dans l'environnement hors-marché *via* les mécanismes opérant dans le contexte politique et social d'une entreprise. La question de recherche est formulée comme suit : **Comment l'autorégulation fonctionne-t-elle en tant que stratégie hors-marché?** Les sous-questions suivantes nous avons permis de procéder à une analyse plus détaillée : **Quels sont les mécanismes par lesquels l'autorégulation est mobilisée dans l'environnement hors-marché ? Certains de ces mécanismes sont-ils enchevêtrés ?**

Pour répondre à ces questions, nous avons cherché à identifier des mécanismes qui permettent à une entreprise de transformer son environnement hors-marché en valorisant leurs initiatives volontaires. « Le positivisme qualitatif » a été choisi comme paradigme épistémologique directeur. Cette approche épistémologique spécifique aux stratégies politiques des organisations, caractérisée par « l'inobservabilité de certains éléments du programme de recherche » et le « caractère très contextuel des modes d'action » desdites politiques, est également qualifiée de positivisme aménagé (Rival and Chanut, 2015: 77). La recherche qualitative positiviste se concentre sur la recherche de régularités et de relations entre différents éléments de la réalité, ainsi que sur la synthèse des modèles identifiés. Conceptuellement, les mécanismes sont des séquences d'action(s)-interaction(s) induisant un changement. Ainsi, un mécanisme est un concept "systémique" qui comporte deux types de constituants - entités et activités - organisées de telle sorte qu'elles sont responsables du phénomène reliant cause(s) et effet(s). Ainsi, l'approche de la stratégie hors-marché basée sur les mécanismes s'inscrit naturellement dans cette posture épistémologique.

Structure

La structure de la thèse reflète la manière d'explorer comment l'autorégulation peut être mise en œuvre dans l'environnement hors-marché. Elle est composée des parties suivantes : éléments théoriques (1), éléments méthodologiques (2), résultats de la recherche (3). La figure ci-dessous résume la structure de chaque chapitre et les détails sont présentés ci-après.

PARTIE 1 - Eléments théoriques	
<p>CHAPITRE 1 - L'autorégulation : la perspective de stratégie hors-marché</p> <p>1.1. L'autorégulation étudiée dans le domaine de gestion</p> <p>1.2. L'autorégulation en tant que stratégie hors-marché</p>	<p>CHAPITRE 2 - Les mécanismes de stratégie hors-marché</p> <p>2.1. La perspective mécaniste en science</p> <p>2.2. Les mécanismes dans la littérature sur les stratégies hors-marché</p> <p>2.3. L'utilisation stratégique de l'autorégulation dans l'environnement hors-marché</p>
PARTIE 2 - Eléments méthodologiques	
<p>CHAPITRE 3 - Le design de la recherche</p> <p>3.1. La conception de la recherche</p> <p>3.2. Le cadre empirique</p> <p>3.3. L'échantillonnage des cas</p>	<p>CHAPITRE 4 - La collecte et l'analyse des données</p> <p>4.1. La collecte des données</p> <p>4.2. L'analyse des données</p> <p>4.3 La qualité de la recherche</p>
PARTIE 3 - Résultats de la recherche	
<p>CHAPITRE 5 - Les résultats</p> <p>5.1. Les mécanismes hors-marché basés sur l'autorégulation</p> <p>5.2. Le modèle d'autorégulation en tant que stratégie hors-marché basé sur les mécanismes</p>	<p>CHAPITRE 6 - La discussion générale</p> <p>6.1. Les contributions</p> <p>6.2. La conclusion</p> <p>6.3. Les limites et les extensions</p>

La première partie, composée de deux chapitres, présente les éléments théoriques mobilisés dans cette recherche. Chapitre 1 expose comment la notion de l'autorégulation est étudiée par les chercheurs en gestion et notamment dans le domaine du management stratégique. Après avoir présenté la définition et les multiples caractéristiques de l'autorégulation organisationnelle, les différentes approches et critiques de l'autorégulation sont exposées. Dans un deuxième temps, l'argumentaire pour considérer l'autorégulation en tant que stratégie hors-marchée est développé suivant deux aspects : ses déterminants (y compris les différentes facettes de la pression extérieure, notamment politique et sociétale) et l'autorégulation en tant qu'une source d'avantage concurrentiel. Le deuxième chapitre présente le concept de « mécanismes » et se focalise sur la manière dont il s'applique aux stratégies hors-marché. L'approche fondée sur les mécanismes n'est pas courante en gestion stratégique. Par conséquent, après une partie introductive sur son utilisation dans la science en générale, la section suivante expose plus en détails les mécanismes hors-marchés identifiés dans la littérature. Cette partie se termine avec une revue la littérature afin de saisir l'impact de l'autorégulation sur l'environnement hors-marché et la manière dont les auteurs expliquent son fonctionnement.

La partie méthodologique est également constituée de deux chapitres. Chapitre 3 présente d'abord le design adapté aux questions de recherche et ensuite, Chapitre 4 la stratégie

de recherche pour identifier et relier les mécanismes entre eux. La recherche est menée sous la forme d'une étude de cas exploratoire et cumulative (Garreau, 2020), visant à apporter des éléments nouveaux et jusqu'alors négligés concernant le phénomène de l'autorégulation. Pour identifier les mécanismes d'influence basé sur l'autorégulation, nous avons mis en œuvre les étapes consécutives de la recherche pour passer de l'identification du phénomène d'autorégulation, en passant par la postulation et la description des mécanismes, pour enfin proposer un modèle les intégrant. La dernière section du chapitre 4 discute de la qualité de la recherche.

Le cadre empirique de l'étude est celui du secteur de la grande distribution alimentaire en France et la manière dont les entreprises mènent leurs politiques de prévention et de gestion des déchets. Les dix cas étudiés sont tirés des initiatives mises en place par le groupe Auchan et le mouvement E. Leclerc dans des domaines suivants : prévention des déchets alimentaires, politique sur les plastiques, emballage et étiquetage des produits. Le cadre législatif relatif à la « politique déchets » et les éléments sectoriels (*e.g.* initiatives collectives) sont fondamentaux dans notre analyse et couvrent la période de 2009 à 2019. Ces éléments de l'ancrage pratique de ma recherche sont également exposés dans la partie empirique.

Le chapitre 5 expose les résultats de la recherche basés sur l'analyse de dix cas mobilisant l'autorégulation comme stratégie hors-marché, ce qui a permis de déterminer plus précisément les trois mécanismes. Le mode de fonctionnement de chaque mécanisme est décomposé en phases consécutives, et les caractéristiques (communes, ainsi que divergentes) sont présentées. Les mécanismes représentent les interactions des entités s'engageant activement, ou bien simplement présentes, dans l'environnement hors-marché dans un contexte où l'autorégulation entraîne une modification des conditions d'opération. La section 5.2 propose un modèle basé sur les trois mécanismes identifiés.

Enfin, nous discutons la place de l'autorégulation parmi les stratégies hors-marché. Les contributions, des limites et futures avenues de recherche sont présentées dans le sixième et dernier chapitre.

Résultats

Dans la perspective stratégique adoptée, nous montrons que l'autorégulation est le déclencheur d'un mécanisme par lequel le comportement des individus, des groupes et des sous-systèmes est modifié pour atteindre un résultat spécifique. Les mécanismes opérant dans

l'environnement hors-marché basés sur l'autorégulation ne sont pas fonctionnellement équivalents. En effet, plusieurs mécanismes peuvent être activés pour régler le même sujet, à différentes phases de son cycle de vie. Par conséquent, certains de ces mécanismes peuvent être identifiés comme des mécanismes de premier ordre, qui s'appuient sur l'autorégulation pour modifier directement le comportement d'autres acteurs, les amenant à réaliser des actions spécifiques. D'autres sont des mécanismes de second ordre activés pour « transformer » le contexte général.

Notre recherche exploratoire a permis d'identifier trois mécanismes qui opèrent dans l'environnement hors-marché :

- Mécanisme 1 - Cautionner l'engagement volontaire,
- Mécanisme 2 - Transformer la géographie du pouvoir,
- Mécanisme 3 - Façonner la réglementation.

Le « mécanisme 1 - cautionner l'engagement volontaire » est axé sur la diffusion d'informations auprès d'une grande variété d'entités. Il se déroule *via* la communication en trois phases consécutives : (1) l'entreprise met en valeur l'autorégulation existante, (2) les parties prenantes extérieures accèdent aux informations primaires, (3) l'entreprise gagne en crédibilité sur la question. Il est à noter que les informations diffusées publiquement restent disponibles pour les décideurs politiques, même s'ils ne sont pas considérés comme une population cible. L'objectif de la communication sur l'autorégulation est de présenter l'expertise de l'entreprise et d'acquérir une meilleure réputation auprès de parties prenantes et l'opinion publique plus largement. En retour, les arguments basés sur l'engagement volontaire utilisés par l'entreprise dans le débat public ou politique peuvent être considérés comme plus crédibles ou plus forts. L'initiative volontaire est reconnue et approuvée par les parties prenantes pour ses qualités (par exemple : l'innovation ou l'efficacité) . Elle peut également devenir une référence pour la résolution d'autres problèmes.

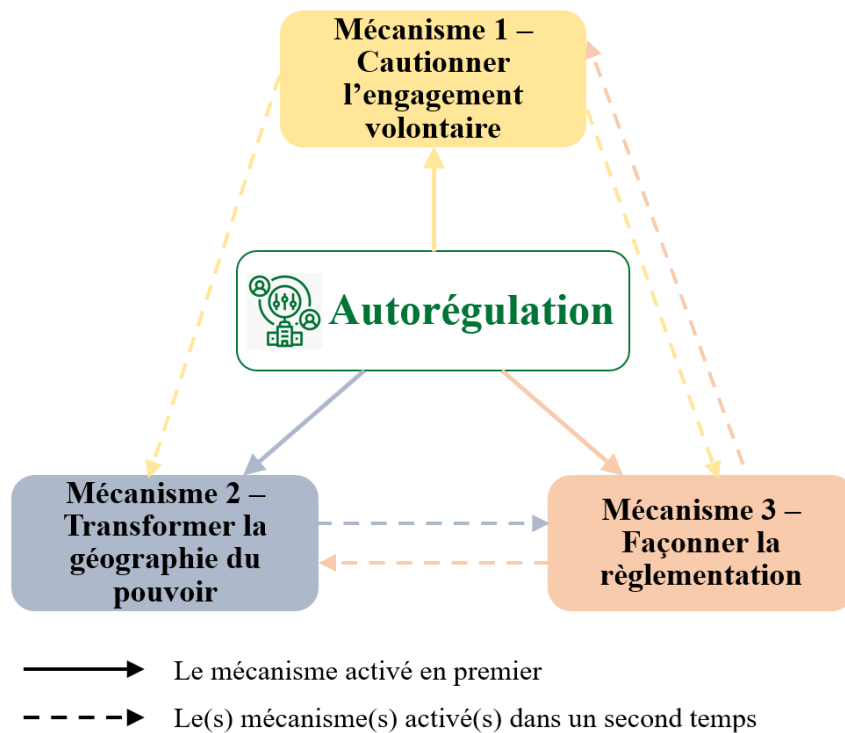
Le « mécanisme 2 - transformation de la géographie du pouvoir » se déroule dans le cadre des interactions entre l'entreprise et divers autres acteurs, y compris les parties prenantes dans l'écosystème d'affaires, ainsi que des acteurs dans un contexte plus large socio-politique. Il se déroule *via* les relations inter-organisationnelles en trois phases consécutives : (1) l'entreprise met en valeur l'autorégulation, (2) le nombre d'acteurs dans l'arène politique change, ce qui entraîne (3) l'évolution du jeu de pouvoir entre les acteurs politiques. Ce mécanisme opère dans un réseau d'entités engagées sur le sujet (ou potentiellement intéressées

par celui-ci) et vise à obtenir le soutien et la reconnaissance des autres organisations dans la recherche de partenariats et la création de coalitions pro-entreprises. Ce mécanisme agit sur la typologie et le positionnement des acteurs dans la négociation politique pour renforcer la position de l'entreprise.

Le « mécanisme 3 - façonner la réglementation » se déroule dans l'arène politique, principalement par le biais d'une activité de lobbying, lorsqu'une entreprise cherche à influencer directement le projet de législation ou le contenu réglementaire. Il se déroule *via* les négociations directes avec les décideurs politiques, en trois phases consécutives : (1) l'entreprise s'appuie sur l'autorégulation dans son argumentaire, (2) les décideurs politiques se rendent compte de la complexité de la question. (3) les entités négocient sur les détails législatifs. Ce mécanisme est activé dans la phase avancée de la résolution de la question et couvre les interactions entre une entreprise et les décideurs politiques. Il vise à démontrer la complexité d'une question et à proposer des solutions alternatives conformes à l'expérience d'autorégulation. La mobilisation des actifs politiques est axée sur l'information et l'accès aux décideurs politiques.

Cette description et caractérisation de trois mécanismes permettent de mieux comprendre comment l'environnement hors-marché est transformé par l'engagement volontaire d'une entreprise. Alors que le premier mécanisme modifie la perception du problème par les parties prenantes et a un impact sur la crédibilité de l'entreprise, les autres sont étroitement liés à l'activité de l'entreprise dans l'arène politique. Le deuxième mécanisme modifie le nombre d'entités politiquement engagées sur un sujet d'intérêt. Ainsi, il transforme la relation de pouvoir entre les différents acteurs. Enfin, le troisième mécanisme se déploie directement dans la phase de négociation politique, lorsqu'une entreprise utilise l'autorégulation pour façonner le contenu de la législation ou les détails de sa mise en œuvre concernant une disposition réglementaire spécifique. Aussi les résultats mettent en lumière les dynamiques induites dans l'arène politique à la suite de mobilisation stratégique de l'autorégulation, sachant que l'objectif principale de son utilisation est de renforcer la position et le pouvoir de l'entreprise dans les négociations politiques.

Dans un deuxième temps, les interactions entre les mécanismes sont étudiées et nous proposons un modèle qui les intègre de manière globale présenté ci-dessous.



Notre recherche montre que différentes configurations d'activation des mécanismes sont possibles et les conditions sont examinées plus en détails afin de mieux comprendre leurs interrelations. Il s'avère que les mécanismes ont des activateurs communs, notamment plusieurs types de pression externe, qui peuvent se manifester graduellement : pression sociale, pression politique et le risque réglementaire. Il appartient à l'entreprise de décider comment répondre à la pression externe en s'appuyant sur son expérience propre de l'autorégulation.

Tout d'abord, chaque mécanisme peut être activé séparément. Le mécanisme de « cautionner l'engagement volontaire » est universel en ce sens qu'il peut être activé pour le règlement des problèmes dans différents contextes et qu'il permet de cibler tous les acteurs avec lesquels l'entreprise entre en relation. Ainsi, il est particulièrement adapté pour répondre aux pressions sociales et politiques. Activé à un stade très précoce de l'émergence du problème peut suffire à bloquer sa prise d'ampleur et d'importance aux yeux des autres. Par ailleurs, une entreprise qui éprouve des difficultés à convaincre les décideurs politiques du bien-fondé d'une politique spécifique peut essayer d'avoir un impact indirect sur la prise de décision en façonnant l'opinion publique. Ainsi, une entreprise peut mobiliser l'autorégulation pour rechercher le soutien de l'opinion public. Cependant, une fois que la menace réglementaire apparaît, les entreprises n'activent plus le mécanisme 1 de manière exclusive.

Le mécanisme de « transformer la géographie du pouvoir » est utilisé dans la phase de formation des groupes d'intérêt. Une entreprise l'active pour transformer le pouvoir de négociation des acteurs (ce qui détermine ensuite leur engagement dans l'arène politique) quand le *statu quo* concernant les acteurs engagés sur le sujet et leur positionnement ne garantissent pas de résultat réglementaire optimal du point de vue de l'entreprise. La capacité d'une entreprise à mobiliser d'autres entités est cruciale dans l'activation du mécanisme 2, notamment lorsque les enjeux sont caractérisés par une responsabilité sociale diffuse. En effet, dans ces conditions, les initiatives d'autorégulation (et leur efficacité) dépendent de la coopération avec les parties prenantes.

Le mécanisme « façonner la réglementation » est activé lorsqu'une entreprise souhaite régler la question en influençant la prescription réglementaire. L'activation directe intervient quand l'entreprise a une expérience significative d'autorégulation concernant le sujet d'intérêt et peut fournir aux décideurs des arguments solides pour contester ou modifier la loi. Cela peut sembler contre-intuitif, mais le mécanisme 3 n'est pas systématiquement activé lorsqu'un risque réglementaire apparaît. Les résultats montrent diverses circonstances dans lesquelles une entreprise renonce au lobbying direct et individuel.

De plus, notre recherche montre que les trois mécanismes identifiés ne sont pas nécessairement linéaires. Ils peuvent être activés indépendamment, concomitamment ou consécutivement (sur la base de la même initiative d'autorégulation), en fonction de la maturité du sujet d'intérêt et du type d'acteurs opérants dans l'environnement hors-marché. En ce qui concerne la combinaison de mécanismes identifiés, un exemple classique serait l'activation consécutive - M1, puis M2 et enfin M3 - en fonction des étapes progressives d'avancement du sujet dans le débat social et politique. Néanmoins, l'activation du mécanisme « cautionner l'engagement volontaire » sert à renforcer la position générale d'une entreprise dans l'environnement hors-marché. Ainsi, en ce qui concerne les combinaisons entre le mécanisme 1 et d'autres mécanismes, l'ordre ne semble pas avoir d'importance particulière. La décision d'activer le mécanisme 2 ou le mécanisme 3 est motivée par des caractéristiques externes, principalement du fait qu'un problème est avancé dans son cycle de vie. De même, l'ordre dans lequel ils sont activés semble important en raison du niveau de risque réglementaire (faible ou élevé) et de l'urgence à agir. L'utilisation de l'autorégulation pour transformer la géographie du pouvoir n'exclut pas l'action politique individuelle, et la mobilisation des deux mécanismes entraîne un renforcement mutuel. La combinaison entre les mécanismes 2 et 3 donne à l'entreprise une position plus puissante au sein de tous les

groupes d'intérêt pour négocier le résultat réglementaire. En effet, les pressions politiques et sociales combinées créent des circonstances dans lesquelles il est difficile pour une entreprise d'éviter le risque réglementaire sur un sujet d'intérêt. Dans ce cas, la combinaison de mécanismes est activée tout au long du processus de négociations politiques pour répondre à différents types de pression externe sur le même sujet.

Globalement, les résultats suggèrent que l'autorégulation est une activité dont les parties prenantes externes ne sont généralement pas conscientes. Sa mobilisation en tant que stratégie hors-marché est principalement déterminée par la transparence de l'entreprise concernant le sujet. La communication sur l'autorégulation, en termes de l'entité cible et canal utilisé, reste déterminante quant à son impact sur l'environnement hors-marché.

Contributions

Les résultats présentés dans cette thèse élargissent les connaissances dans le domaine des stratégies hors-marché en identifiant trois mécanismes qui permettent à une entreprise qui s'autorégule d'influencer son environnement, en sens large. En incluant l'autorégulation dans la panoplie des stratégies hors-marché, nous contribuons à une meilleure compréhension de ce phénomène, ainsi qu'à la catégorisation des stratégies et des activités politiques.

L'autorégulation appartient aux stratégies hors-marché en raison de ses antécédents, de son mode de fonctionnement. et de ses conséquences potentielles. Premièrement, l'autorégulation est une stratégie hors-marché, compte tenu de ses antécédents. On trouve la pression externe parmi les principales motivations de la mise en œuvre de l'autorégulation. L'autorégulation est utilisée comme une réponse stratégique à de multiples forces extrinsèques : pression sociale (par des activistes ou des organisations non-gouvernementales), pression sociale indirecte (acteurs sociaux qui attendent des pouvoirs publics qu'ils restreignent les activités de l'entreprise), pression politique (décideurs politiques demandant aux entreprises un comportement spécifique), et menace réglementaire. Deuxièmement, l'autorégulation est une stratégie hors-marché par son mode de fonctionnement. Elle implique d'interagir avec les acteurs sociaux et politiques et de modifier leurs perceptions. Ensuite, elle modifie les jeux de pouvoir existants qui en découlent. De plus, les effets potentiels de l'autorégulation sont observables dans l'environnement hors-marché. L'identification des mécanismes permet de distinguer les résultats intermédiaires et finaux. Les premiers prennent des formes diverses, de l'acquisition de la légitimité, à la construction de coalitions, en passant par les tentatives

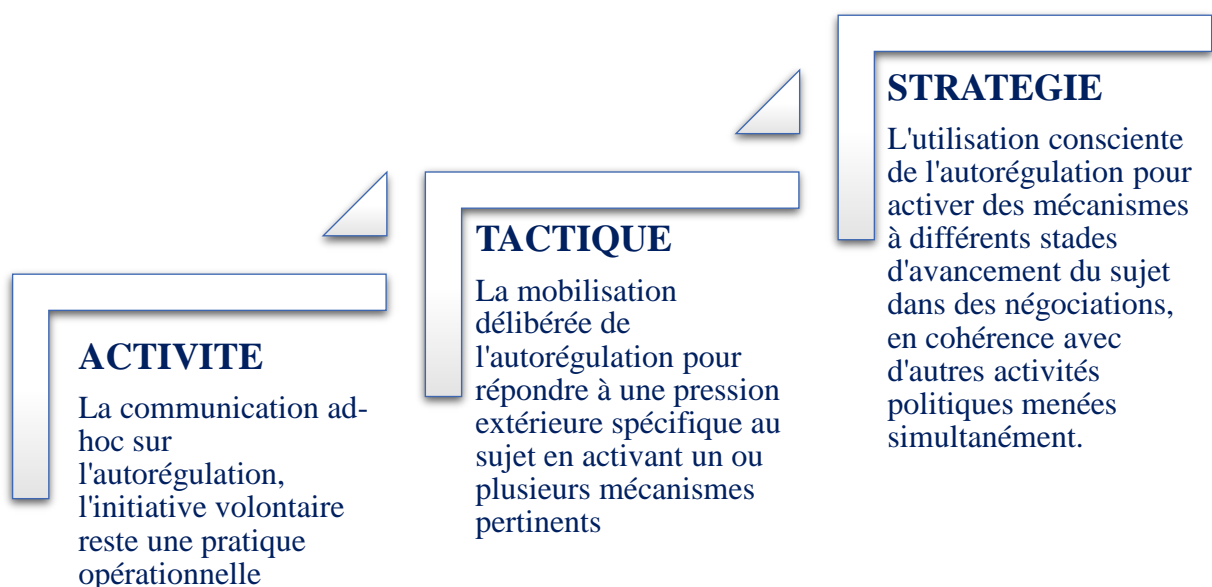
législatives contrecarrées. Les seconds sont directement liés à la réglementation (résultats réglementaires). Pour toutes les raisons mentionnées ci-dessus, il n'y a pas de place pour le doute quant à l'inclusion de l'autorégulation parmi les autres stratégies hors-marché.

Tout d'abord, l'idée que l'autorégulation sert à rendre la réglementation inutile est reconsidérée. La mobilisation de l'autorégulation comme stratégie hors-marché entraîne au moins deux résultats réglementaires contradictoires. Premièrement, l'engagement volontaire peut exister à la place de la loi s'il est reconnu comme une alternative viable à la législation. Par conséquent, on peut considérer que l'autorégulation dissuade les pouvoirs publics de la mise en place d'une législation. Cependant, les résultats de cette étude montrent que ce n'est qu'une perspective temporaire utilisée dans l'analyse qui différencie la capacité de bloquer l'adoption d'une nouvelle réglementation (absence durable de réglementation sur le sujet) de son retardement (report de son adoption). Une entreprise peut réussir à maintenir le sujet hors de l'arène politique pendant un certain temps ; toutefois, rien ne garantit qu'il ne réapparaîtrait pas plus tard dans le débat politique. En effet, il est démontré que des sujets laissés de côté à un moment donné réapparaissent systématiquement dans des projets législatifs consécutifs, même si la future législation semble moins étroitement liée aux sujets eux-mêmes. Deuxièmement, l'autorégulation est principalement utilisée pour influencer les projets de loi. Elle est mobilisée pour façonner le contenu réglementaire (réduire la sévérité et les coûts de mise en conformité) et le calendrier de mise en œuvre (périodes de transition).

Les nombreux cas analysés dans le cadre de cette thèse ont finalement toujours été couverts par la réglementation publique, ce qui conduit à penser que l'autorégulation est une stratégie hors-marché inefficace. Néanmoins, l'engagement volontaire a un impact plus large sur le contexte socio-politique et institutionnel. Outre le résultat réglementaire en soi, il affecte les relations des acteurs politiques et les sources d'avantage concurrentiel au-delà des marchés. Une entreprise traite quotidiennement avec différents acteurs, ce qui augmente considérablement la complexité de son positionnement dans l'environnement hors-marché. Il est à noter que les interactions entre d'autres acteurs, indépendantes de la stratégie de l'entreprise et au-delà de sa sphère d'influence directe, ont souvent un impact sur son activité. Ainsi, l'autorégulation est un exemple de stratégie que l'entreprise peut mobiliser en réponse aux stratégies hors-marché d'autres acteurs, articulant les relations entre les différentes parties prenantes de manière beaucoup plus complexe. Il est démontré que les activités politiques d'un acteur peuvent constituer les antécédents de la mise en place d'une stratégie par d'autres en les amenant à se comporter différemment à la suite d'une action spécifique. Par exemple,

nos résultats confirment qu'une entreprise soumise à la pression externe d'activistes conflictuels préfère poursuivre son engagement volontaire en partenariat avec des activistes coopératifs (Baron et al., 2016), tout en négligeant les premiers.

En ce qui concerne les contributions théoriques à la recherche sur les stratégies hors-marchées, les résultats présentés dans notre recherche étendent les connaissances dans plusieurs directions. Premièrement, ils permettent de mieux distinguer les trois niveaux d'engagement d'une entreprise dans son environnement hors-marché : mise en place d'une activité politique *ad hoc*, poursuite d'une tactique prédéfinie ou encore définition et implémentation d'une réelle stratégie hors-marché. A notre connaissance, aucune étude n'a approfondi la compréhension de l'autorégulation dans ce sens, ni analysé l'autre phénomène à travers les trois perspectives. La proposition de la triple perspective hors-marché est présentée dans la figure ci-dessous.



L'autorégulation peut être considérée comme une activité délibérément dissociant l'entreprise de son environnement hors-marché. La démonstration de l'engagement volontaire est une stratégie tampon intentionnelle visant à acquérir une indépendance vis-à-vis de l'environnement externe, tandis que l'initiative d'autorégulation reste opérationnelle dans la pratique. Au fur et à mesure que l'environnement évolue, l'autorégulation permet de gérer la pression externe et de tirer parti des circonstances changeantes. Cette utilisation tactique de l'autorégulation consiste à activer différents mécanismes pour renforcer un avantage concurrentiel. La distinction entre les approches tactique et stratégique demeure dans la vision temporelle du comportement des entreprises. Conformément à une approche stratégique, étant

plus globale, l'autorégulation peut être perçue comme stratégique si elle est mise en œuvre dans le cadre d'un ensemble d'actions, dans les environnements du marché et hors-marché, soumises à une coordination explicite et poursuivant un objectif prédéterminé.

Deuxièmement, cette étude montre que les diverses activités menées dans l'environnement hors-marché peuvent être liées et ceci de différentes manières, par exemple, se renforcer ou se substituer. Ce lien est démontré entre l'autorégulation et le lobbying, ainsi que l'autorégulation et la gestion de partie prenantes pour obtenir leur soutien. Aussi, la mobilisation de l'autorégulation comme stratégie hors-marché peut avoir plusieurs effets en relation avec d'autres activités politiques : (1) l'effet d'entraînement - transformer l'activité politique en une stratégie hors-marché, (2) l'effet de compensation - Accueillir diverses activités pour renforcer l'impact global, et (3) l'effet d'éviction - Choisir stratégiquement entre diverses activités non marchandes.

Troisièmement, les marchés sont intrinsèquement politiques, tant en raison de leurs liens avec les fonctions de régulation de l'État que des défaillances du marché que divers acteurs peuvent contester. Ainsi, les entreprises opèrent dans un paysage concurrentiel qui se compose du marché et de l'environnement hors-marché. La catégorie des « acteurs politiques » englobe, avant tout l'État (avec ses institutions et agents publics) qui a la légitimité de fixer et d'appliquer des réglementations. Néanmoins, la place des entreprises dans la politique contemporaine a augmenté au cours des dernières décennies, les entreprises sont devenues des acteurs politiques importants, et plus particulièrement en ce qui concerne des enjeux sociaux et environnementaux. Dans la mesure où les entreprises privées jouent un rôle dans l'arène politique, elles participent à l'établissement des politiques publiques tout en développant simultanément des institutions privées. Par conséquent, certains chercheurs soutiennent que toutes les entreprises sont constamment des acteurs à la fois économiques et politiques (Salorio et al., 2005). Les résultats de cette étude soutiennent l'idée que l'autorégulation organisationnelle est une activité de gestion stratégique qui améliore la performance opérationnelle, étant en parallèle mobilisable dans l'environnement hors-marché. Cependant, certains refusent d'appeler « autorégulation » une action qu'une entreprise mène pour des raisons économiques (améliorer l'efficacité des ressources ou mettre en œuvre des normes sociales minimales pour faire croître les profits), les considérant comme un « comportement normal de maximisation des profits des entreprises privées » (Maurer, 2017 : 7). Les éléments de cette recherche pointent vers l'idée que l'autorégulation mise en place pour des raisons de marché peut être mise à profit pour répondre à la pression externe exercée

par différents acteurs dans l'environnement hors-marché. L'analyse de l'autorégulation sous l'angle de la stratégie intégrée permet de conclure que l'engagement volontaire imbrique *de facto* des caractéristiques de stratégies du marché et hors-marché. Nos résultats confirment que ce phénomène est un objet d'étude à la croisée des sciences économiques et sociales, car les actions économiques restent ancrées dans la structure des relations sociales (Granovetter, 1985) et les mécanismes opérants dans l'environnement hors-marché sont nécessaires pour améliorer l'efficacité des échanges commerciaux (Boddewyn, 2003).

En ce qui concerne les contributions méthodologiques, nous soulignons les avantages de l'application de méthodes basées sur l'identification de mécanismes dans des sciences de gestion et sa complémentarité avec d'autres modèles de recherche. Effectivement, la notion de mécanisme n'a pas été mobilisée de manière cohérente par les chercheurs en stratégie. Il est donc pertinent de développer une compréhension commune de ce concept et de démontrer son utilité analytique. En outre, le caractère interdisciplinaire et cumulatif des connaissances générées par l'approche fondée sur les mécanismes facilite le dialogue entre des chercheurs issus de milieux différents ou utilisant des méthodologies de recherche différentes. Les résultats de cette recherche prennent la forme d'une collection de mécanismes, adaptables à des situations et contextes particuliers, et peuvent être considérés comme une boîte à outils (Elster, 2015). Une telle boîte à outils serait utile pour intégrer les connaissances sur les stratégies hors-marché générées dans des domaines tels que la science politique, l'économie et la gestion. Les résultats contribuent à une meilleure compréhension du fonctionnement empirique des stratégies hors-marché. Les explications statistiques servent à (in-)confirmer qu'une stratégie produit le résultat souhaité, tandis que les explications mécanistes concernent la manière dont elle y parvient. Ainsi, les schémas de mécanismes fournissent un panel d'éléments pertinents expliquant les faits et intérêts empiriques, utile pour mieux justifier et d'expliquer le choix des variables utilisées dans les modèles statistiques pour relier les stratégies à leurs résultats (Kanol, 2015). Ils sont essentiels dans la construction de scénarios causaux alternatifs et la recherche de preuves qui pourraient les discriminer (Ylikoski, 2019).

L'approche par les mécanismes est une alternative intéressante aux autres approches utilisées dans les études stratégiques, telle que l'étude processuelle (Langley, 1999) ou par réseau (Barczak, Kafel et Magliocca, 2021). Elle présente plusieurs avantages, en développant une compréhension détaillée du phénomène - représenter le phénomène d'intérêt de manière schématique mais aussi réaliste que possible. Cette méthode a des applications pratiques dans le cadre d'une stratégie de recherche qualitative longitudinale, ce qui semble être le cas des

études processuelles, mais elle en diffère sensiblement en termes de résultats. Toutes deux soulignent l'importance de la temporalité, du contexte et des jeux de pouvoir. Cependant, une approche fondée sur les mécanismes permet de réduire la complexité en omettant les éléments non pertinents et en trouvant les schémas nécessaires pour formuler les résultats sous forme d'étapes séquentielles. Aussi, l'une des trois principales approches de conceptualisation de l'environnement hors-marché est celle par réseau (Luca Doh, 2012). Par rapport à l'analyse de réseau utilisée pour identifier les attributs des acteurs et les relations qu'ils établissent entre eux, l'approche par les mécanismes permet de prendre en compte non seulement l'existence de liens entre entités mais de mieux comprendre les interactions au cœur de ces relations. En effet, les processus sociaux impliquent de multiples agents, des interdépendances, des croyances et des attentes structurelles complexes, ainsi que des processus de rétroaction qui se déroulent souvent sur une longue période. Une approche par les mécanismes peut mieux capter cette complexité et ainsi fournir une réponse adaptée aux défis de la théorisation des enjeux complexes.

Enfin, et surtout, nous considérons les contributions managériales. Grâce à la compréhension du fonctionnement des mécanismes actionnés par l'autorégulation dans l'environnement hors-marché, cette étude est à la fois explicative et prédictive, sans s'appuyer sur des théories trop abstraites. Les connaissances générées par cette étude peuvent être utiles aux entreprises en leur expliquant comment valoriser leurs engagements volontaires auprès des autorités publiques et de tous les groupes d'intérêt engagés dans les arènes politiques et sociales. La prise de conscience croissante des managers concernant la dimension stratégique de l'autorégulation favorise la sélection de la stratégie hors-marché la plus appropriée pour aborder un sujet d'intérêt dans un contexte socio-politique précis (Christmann et Taylor, 2002). Notre recherche démontre les canaux d'influence potentiels tout en indiquant des tactiques potentielles à poursuivre dans l'environnement hors-marché. Plusieurs de ces tactiques ont été décrites dans l'étude et peuvent servir de référence.

Un autre point à retenir en matière de gestion est que chaque mécanisme permet à une entreprise d'entrer en relation avec différents types de parties prenantes, à savoir le public, d'autres organisations ou les décideurs politiques. Ainsi, d'un point de vue pratique, différentes unités de l'entreprise, par exemple une direction de la communication, une fondation gérant les activités de mécénat ou une unité des affaires publiques, peuvent chacune privilégier un mécanisme spécifique pour interagir avec l'environnement externe. Les mécanismes étant interdépendants, il est nécessaire d'assurer une bonne coordination pour,

d'une part, mettre en œuvre l'autorégulation et, d'autre part, l'utiliser de manière cohérente et stratégique dans l'environnement hors-marché plus largement.

Les résultats suggèrent que l'autorégulation est une stratégie hors-marché très polyvalente, en raison de son potentiel à transformer diverses dimensions de l'environnement externe. En effet, la possibilité de mobiliser l'autorégulation à différents stades du cycle de vie d'un sujet d'intérêt ouvre un large éventail d'opportunités pour influencer son évolution et son résultat - de l'identification du problème en agissant sur sa saillance, en passant par la formation de groupes d'intérêt et la négociation politique sur la scène législative, jusqu'à l'application par les agences exécutives. En outre, à chaque étape, l'entreprise s'engage dans un jeu politique avec différents parties prenantes. L'autorégulation contribue de manière significative à influencer la perception du sujet d'intérêt par la société et des groupes de pression, y compris les activistes et les ONG. En outre, tout en influençant le comportement des acteurs sociaux, l'autorégulation contribue à modifier les positions des décideurs politiques. Son impact direct et indirect sur le comportement d'autres acteurs dans l'environnement hors-marché fait de l'autorégulation une stratégie puissante et universelle.

Limites

Nous identifions plusieurs limites à cette étude. Tout d'abord, elle est limitée par le cadre empirique choisi. Une conséquence de la perspective temporelle entre 2009 et 2019 est le fait que les différentes trajectoires ne sont pas équivalentes les unes aux autres. Si certaines se développent dans un contexte similaire et permettent des analogies directes entre les stratégies hors-marché des entreprises, elles restent éclectiques en termes de durée. Par conséquent, son principal défaut est que l'adoption d'une temporalité différente pourrait apporter d'autres résultats. Une autre limite découle de la nécessité de reconstituer les cas de mobilisation de l'autorégulation dans l'environnement hors-marché. Les informations concernant les intentions et les objectifs des entreprises en matière d'autorégulation peuvent être biaisés. Néanmoins, j'ai rassemblé des données provenant de diverses sources afin de les trianguler et de rendre les preuves plus fiables.

Les limites concernant la généralisation des résultats de cette étude trouvent leur origine dans son design de recherche (étude de cas exploratoire) et sa méthode adaptée basée sur les mécanismes. En effet, la généralisation empirique directe à partir d'études de cas est délicate, et l'approche par les mécanismes ne change pas ce fait largement reconnu. Les études

exploratoires sont généralement basées sur un nombre modeste d'échantillons qui peuvent ne pas représenter adéquatement la population cible. L'échantillon de deux organisations peut sembler restreint, mais les divers projets restent les principales unités d'analyse, ce qui porte à dix le nombre de cas étudiés. La précision explicative des mécanismes est limitée à une gamme spécifique de phénomènes et le processus analytique axé sur l'identification des mécanismes entraîne nécessairement une simplification. Malgré cela, les mécanismes de stratégie hors-marché déterminés dans cette étude sont caractérisés par la forte probabilité d'être perçus dans d'autres contextes empiriques.

Voies de recherches futures

Puisque l'autorégulation est un concept mobilisé par des chercheurs issus de plusieurs traditions disciplinaires (sciences politiques, droit, gestion) et qu'elle concerne plusieurs niveaux d'analyse (organisationnel, sectoriel, global), j'espère stimuler la recherche future parmi ces différentes communautés.

Premièrement, les études futures pourraient continuer à analyser les caractéristiques de l'autorégulation du point de vue des stratégies non-marché et questionner sa persistance, son inimitabilité ou encore le risque de détournement. En ce qui concerne la dimension stratégique de l'autorégulation, il serait intéressant d'examiner comment l'autorégulation est mise en œuvre dans une entreprise en interne pour appréhender l'existence d'une volonté (l'intentionnalité ou son absence) de lui donner cette dimension. La question de l'intentionnalité n'a pas été soulevée dans cette recherche. L'activité politique peut être définie comme tout effort intentionnel des entreprises pour influencer les politiques publiques ou quasi-publiques (Hilman et al., 2004). Néanmoins, l'influence politique n'est pas égale à la stratégie politique, car la première peut apparaître sans intention consciente ou effort concerté (Springuel, 2011), tandis que la seconde révèle de l'allocation intentionnelle de ressources et le choix de l'activité à mener. A l'inverse, la stratégie peut aussi être considérée comme un phénomène résultant de décisions incrémentales *ad hoc* qui ne cohabitent que dans un schéma reconnaissable (Mintzberg, 2007). Compte tenu des contributions exposées ci-dessus, la question de savoir à quel moment une activité hors-marché devient intentionnellement stratégique devrait être clarifiée davantage.

Deuxièmement, cette recherche qualitative exploratoire peut être étendue de deux façons : (1) par des études qualitatives pour fournir des résultats approfondis dans un autre

contexte et éventuellement enrichir les connaissances concernant les mécanismes déjà identifiés, et (2) par des études basées sur d'autres méthodes pour valider les résultats. Tout d'abord, il serait nécessaire de répondre à une question si les mécanismes ont été identifiés de manière exhaustive dans l'étude actuelle et éventuellement quels seraient les autres mécanismes spécifiques à l'autorégulation.

Puis, en ce qui concerne l'approche appliquée par les mécanismes, il est possible de développer la stratégie de recherche (Wight, 2015) pour des extensions ultérieures du modèle proposé. Aussi, explorer empiriquement les mécanismes activés par divers acteurs, et pas seulement les entreprises, serait intéressant pour confronter les résultats et distinguer davantage les spécificités des stratégies hors-marché appliquées par différentes entités.

Enfin, explorer empiriquement les mécanismes actifs dans l'environnement hors-marché par divers acteurs, et pas seulement les entreprises, serait intéressant pour confronter les résultats et distinguer davantage les spécificités des stratégies appliquées par différentes entités. De multiples études analysent les modèles de telles interactions (Abito, Besanko, et Diermeier, 2016 ; Baron et al., 2016 ; Lyon et Maxwell, 2004). Cependant, les études de gestion manquent de leur confirmation « in vivo ». Il semble donc essentiel de révéler et de comprendre, grâce à de futures recherches, les interactions complexes qui surviennent dans l'environnement hors-marché et de considérer les dynamiques systémiques entre les différents acteurs économiques, sociaux et politiques.

GENERAL INTRODUCTION

For a long time, largely inspired by Porter (1980, 1985), researchers in business strategy have focused on how companies seek a sustainable competitive advantage through several manners directly related to the firm's positioning in a marketplace. Most strategic management theories focus on how firms achieve and sustain competitive advantage over their rivals when the landscape is given. It means that pre-existing institutions, independent from an organization, constrain and determine actors and their behaviour. Moreover, any change to the business conditions presumably occurs for exogenous reasons (external environment) and thus shall be passively accepted or addressed with resources and competencies that the firm detains.

However, the business environment consists of market and nonmarket components, equally determinant for successful business operations. Wherefore, researchers assume that companies operate simultaneously in the market and in what is known as the nonmarket environment. The latter is becoming increasingly important for formulating and implementing overall organizational strategy. According to the nonmarket strategy research stream (Baron, 1995), firms can affect their external environment through various activities to set up or modify their business conditions. It means an organisation can act upon it as a part of the system.

The following definition of nonmarket strategy derived from a recent review by Mellahi and colleagues (Mellahi et al., 2016: 143) is retained in this research: "Nonmarket strategy refers to a firm's concerted pattern of actions to improve its performance by managing the institutional or societal context of economic competition".

The nonmarket research stream finds its genesis in political economy and research on public regulation and policy impact on business (Epstein, 1969; Stigler, 1970). Overall, scholarly interest in nonmarket strategy has existed since the 1970s. Since the 1990s, a separate nonmarket strategy research field has emerged within the discipline of business and management studies. It has come of age recently (Doh, Lawton, and Rajwani, 2012; Doh, McGuire, and Ozaki, 2015). Over time, the rising interest in nonmarket strategy has allowed the research field to be recognized by prestigious management communities and go far beyond the American ethnocentric approach dominant in the 1990s and early 2000s (Marquis and Raynard, 2015).

Four main perspectives on the ‘nonmarket’ concept structured the scientific debate (Boddedwyn, 2003). Initially, neoclassical economics emphasised the importance of institutions as corrective mechanisms in addressing market failures. Further, organization theory helped to overcome the limits of economic “bounded rationality” and to include the mechanisms with social purposes alongside the regulative ones. Thirdly, political theory complemented the reflection by adding the notion of the coercive power of politics, based on the interplay between divergent/common interests and political views of various actors, including public opinion. Finally, sociology highlighted the social embeddedness of economic activity and the existence of social institutions (e.g. reputation, moral obligations) and organizations (e.g. interest groups and the media).

However, currently, there is no single theory or literature stream that explores the nonmarket strategy domain. Due to various disciplinary and theoretical approaches to examining nonmarket strategy, one finds multi-layered research conceptually and methodologically rooted in several scientific disciplines, including economics, political science, sociology, and management. The literature identifies about twenty different theoretical perspectives applied to nonmarket strategies (Getz, 2002; Henisz and Zelner, 2018). Consequently, scholars demonstrated the usage of several mainstream theories to explain nonmarket strategy drivers and determinants or performance implications while considering them more complementary than contradictory to each other (Mellahi et al., 2016)¹.

The significance of a nonmarket strategy in managing firms’ institutional environment is acknowledged, both nationally and internationally (Keillor and Hult 2004). Nonmarket issue management is proved to be “both institutional response and a strategic adaptation” to social and political environments (Greening and Gray, 1994: 467). A firm facing a challenge in the nonmarket environment may decide to passively accept the consequences of regulations and norms on its activity. A passive nonmarket behaviour resembles observing from a distance evolution of the nonmarket issue over its lifecycle and deliberately failing to act. However, intentional nonparticipation in setting the issue appear not to be a sustainable option for an organization. Indeed, in the complex nonmarket environment, organizations face the dilemma of adapting their behaviour to the external context (reactive nonmarket strategy) or

¹ The following perspectives are predominant in analysing nonmarket strategies: institutional (Doh *et al.*, 2012; Voinea and van Kranenburg, 2018), resources and capabilities (Brown, 2016; Oliver and Holzinger, 2008; Parnell, 2018), and political environment (Sun et al., 2021).

attempting to shape it (proactive nonmarket strategy). One would expect companies to proactively engage in nonmarket behaviours if they wish to maintain their domain of operations (Baysinger, 1984).

Nonmarket strategy is typically associated with firm-government interplay, even though social institutions, such as the media and interest groups, have progressively emerged as influential political actors (Breitinger and Bonardi, 2016; McDonnell and Werner, 2016). Government is a pivotal actor in the nonmarket environment, and business firms are recognized as prominent political actors (Rasche, 2015; Scherer *et al.*, 2014). Consequently, nonmarket strategy research initially focused on public institutions and how firms may influence policy decision-makers.

In the political arena, firms engage in corporate political activity (Hillman, Keim, and Schuler, 2004; Lawton, Mcguire, and Rajwani, 2013; Lux, Crook, and Woehr, 2011), whereas other activities toward society are often labelled as corporate social responsibility (hereafter CSR) (Baron, Harjoto, and Hoje, 2011; Frynas, Child, and Tarba, 2017; Gond and Matten, 2007; Richter, 2011). Research on corporate political activities focuses on a subset of a nonmarket environment determined by the type of constituents targeted by firms' activities, namely political and regulatory decision-makers. Hillman and Hitt (1999) identified three main political strategies – informational, financial and relational. However, other categorisation may apply in democratic regimes, where the doctrine of the separation of powers divides the public institutions into three branches: legislative, executive, and judicial (where the legislature makes the laws, the executive puts the rules into operation, and the judiciary interprets the regulations). Aside from activities carried out towards political or administrative players, like lobbying and financial contributions, a critical potential exists in developing strategic behaviours in the legal arena (Casarin, 2015). The concept of “lobby, buy or sue” best summarises this triptic of activities aimed at influencing political and institutional actors (de Figueiredo, 2009).

If one looks closer at informational, financial, and relational strategies, it is possible to determine core activities in each category. Lobbying remains one of the principal informational nonmarket strategies, concurrently bringing a significant return on investment (De Figueiredo, 2002; de Figueiredo and Silverman, 2006). It is probably the most investigated nonmarket activity (Delmas, Lim, and Nairn-Birch, 2016; Hill *et al.*, 2013; Pierskalla and Weschle, 2014; Sadrich and Annavarjulia, 2003). Transactional strategies

cover the activities of providing financial support and are usually issue-specific (reply to relatively urgent needs, non-repetitive). The possibility of direct financial contribution to political parties depends on each country's specific rules of a political system. Therefore, they are common in the United States and almost inexistent in most European countries (due to the ban on financing the parties by private firms) (Bonica, 2014; Kirkland, Gray, and Lowery, 2010; Lake, 2015; McKay, 2010; Milyo, Primo, and Groseclose, 2000; Schuler, Rehbien, and Cramer, 2002). As long as relational strategies are concerned, they cover long-term oriented actions that minimise the uncertainty, increase mutual trust between actors, improve joint problem-solving and allow firms to detect future institutional changes in advance. They are based on networks and knowledge transfer. Constituency building is a traditional strategy to align with other actors on the issue, while many actors have a stake in it (Clark and Crawford, 2012; Lord, 2000, 2003). It allows multiple actors to gain bargain power and pool their capabilities. However, a company can leverage a wide range of other nonmarket activities to impact its external environment².

Further, researchers distinguish two types of nonmarket strategies, namely private and public politics (Baron, 2001). Consequently, private politics cover firms' activities that endeavour to influence economic activity without relying on public institutions (Egorov and Harstad, 2017). Also, other interest groups can carry on private politics actions, for instance, boycotts or media criticism (Breitinger and Bonardi, 2016; Soule, 2012). In practice, a proliferation of new public politics is concurrent with the growth of private initiatives, such as participating in sectoral associations or product-oriented multistakeholder governance groups (Forest Stewardship Council, Marine Stewardship Council), developing and implementing standards (i.e. ISO norms), establishing codes of conduct and best practice sharing or community outreach programs. For instance, recently, scholars identified a new type of nonmarket strategy, namely self-categorisation, consisting of the purposeful use of labels, rhetoric, and narratives by multinational enterprises' subsidiaries (Curchod, Patriotta, and Wright, 2020). According to the authors, in the context of international expansion, companies may mobilise self-categorisation to improve their fit into the local institutional environment and enable strategic positioning vis-à-vis both regulators and local incumbents.

Self-regulation can be added to this set as another form of private politics. In this research, I use the definition developed by Coglianese and Mendelson (2010: 151) of self-

² A more extensive presentation of nonmarket activities is presented in Appendix 1.

regulation as “any system of regulation in which the regulatory target (...) imposes commands and consequences upon itself”. Overall, self-regulation refers to a unilateral, voluntary commitment by the firm to initiate constraining behaviour. Often considered a solution that public authorities use to improve governance effectively (Black, 2001), self-regulation is indeed a tool of private rule-making (Porter and Ronit, 2006).

Business and management literature provides some arguments to conclude that self-regulation is a type of nonmarket strategy. However, it attracts scant attention, and nonmarket scholarship lacks detailed insight into this phenomenon (Pereira dos Passos et al., 2022). Typically, a firm’s self-regulation is seen as a voluntary action to avoid a coercive governmental policy, also acknowledged as its principal motivation (Maxwell et al., 2000; Solomon, 2010). *De facto*, it is the main argument for categorising self-regulation as a nonmarket strategy. According to nonmarket strategy analyses conducted from a new institutional economics perspective, self-regulation is presented as a proactive, additive nonmarket strategy (Dorobantu *et al.*, 2017). Contrarily, other scholars who conducted systematic reviews did not identify self-regulation as a nonmarket strategy (Gorostidi-Martinez and Zhao, 2017; Mellahi et al., 2016; Wrona and Sinzig, 2018).

Attempts at business self-regulation are common and widespread; thus, many self-regulation initiatives emerge at different levels to supplement laws and norms in force. Multiple initiatives have occurred globally (e.g. The United Nations Global Impact, The Global Reporting Initiative, The Business Principles for Countering Bribery) or in specific industries (e.g. Responsible Care program). Industry self-regulation has gained a particular interest as it is considered more advantageous than other types (Hemphill, 1992), especially in overcoming collective action problems, for example, free riding or coordination (King and Lenox, 2000; Lenox, 2006). Consequently, the analyses of self-regulation in the management field are anchored on different levels: firm or corporate (organizational level), industry or sectoral (field level), business level (simultaneously national and multisector) and societal (global initiatives).

Collective self-regulation and actions undertaken on the industry level have been extensively studied in the European Union context (Héritier and Eckert, 2008, 2009; Molina, 2014) and worldwide (Dashwood, 2014; Gunningham, 1995; King and Lenox, 2000; Marx, 2008). Diverse industries, such as food and beverages, health care, advertising, mining, forestry and marine fishing, have used self-regulatory processes to govern industry practices

(Sharma *et al.*, 2010). Industry self-regulation is defined as "a regulatory process whereby an industry-level, as opposed to a governmental- or firm-level, organization (such as a trade association or a professional society) sets and enforces rules and standards relating to the conduct of firms in the industry" (Gupta and Lad, 1983: 417).

As stated before, a nonmarket strategy serves firms to acquire a competitive advantage. The core benefits of industry self-regulation are strategic control, reputation, network benefits and learning (Bowen, 2019). However, an engagement in collective action excludes the possibility of obtaining an advantage individually over the competitors, as it is aimed at providing benefits to all participants. Sustaining a competitive advantage in the long term requires resources and competencies that are hard to imitate by rival companies. Hence, in this study, the organizational level of self-regulation is observed rather than the sectoral one, and industry self-regulation does not retain our attention in further research.

Self-regulation leveraged as a nonmarket strategy remains a typical "black box" (Whitley, 2008). There is no doubt that self-regulation may modify the nonmarket environment, but the studies seem unsatisfactory regarding the detailed understanding of how it happens. They lack in-depth insight into how a company alters other nonmarket actors' behaviour through voluntary corporate commitment. In fact, despite indications scattered in the literature, it does not seem clear how self-regulation leads to the transformation of a complex nonmarket environment since its nonmarket strategic potential and triggered forces are not apparent at a glance.

Therefore, this study explores self-regulation from a nonmarket strategy perspective and aims to reveal the link between self-regulation and transformation of the nonmarket environment by comprehending how the changes take place. The research question is formulated as follows:

How does self-regulation operate as a particular nonmarket strategy?

The following sub-questions allow us to proceed more detailed analyse: **What are the mechanisms through which self-regulation operates as a nonmarket activity? Do some of these mechanisms intertwine with one another?**

To fulfil research goal, I investigate mechanisms that allow companies to transform their business context by mobilising corporate self-regulation. The thesis structure reflects the manner of exploring how self-regulation can be enacted in the nonmarket environment. It is composed of the following parts: theoretical elements (part 1), methodological elements (part 2), and research findings (part 3). The figure below summarises the thesis structure, and details are presented hereafter.

Figure 1. Thesis structure

<p><u>INTRODUCTION</u></p> <p>Interest and issues of the research topic, general presentation of the research Research questions - Thesis structure</p>
<p><u>PART 1 – THEORETICAL ELEMENTS</u></p> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 1 – Self-regulation: insights into the nonmarket strategy</p> <p style="text-align: center;">Self-regulation in management scholarship - Self-regulation as a nonmarket-strategy</p> </div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 2 – Nonmarket strategy mechanisms</p> <p style="text-align: center;">Mechanistic perspective in science - Mechanisms in the nonmarket strategy literature Strategic use of self-regulation in the nonmarket context</p> </div>
<p><u>PART 2 – EMPIRICAL ELEMENTS</u></p> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 3 – Research design</p> <p style="text-align: center;">Research design: exploratory case study, qualitative positivism, cumulative cases (10) Research background: French food retail sector – environmental regulations</p> </div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 4 – Data collection and analysis</p> <p style="text-align: center;">Data sources: primary and secondary sources for triangulation Methods of analysis: mechanism-based research strategy Quality of the research</p> </div>
<p><u>PART 3 – RESEARCH FINDINGS</u></p> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 5 – Research results</p> <p style="text-align: center;">Nonmarket mechanisms based on self-regulation Mechanism-based model of self-regulation as a nonmarket strategy</p> </div> <div style="border: 1px solid black; border-radius: 10px; padding: 5px; margin: 5px;"> <p style="text-align: center;">Chapter 6 – General discussion</p> <p style="text-align: center;">Contributions: theoretical, methodological and managerial Conclusions : integration of self-regulation in the panoply of nonmarket strategies Limits - Extensions</p> </div>

The first two chapters outline the theoretical elements. Section 1.1. gives a brief overview of self-regulation in strategic management. After presenting the definition and

multiple features of organizational self-regulation, it traces how management researchers have studied the phenomenon. Finally, some critics of self-regulation are considered. Section 1.2. provides an argument on self-regulation as a nonmarket strategy by identifying its drivers and determinants. Also, it demonstrates how self-regulation is leveraged in the nonmarket environment and questions its link to competitive advantage.

The second chapter introduces the concept of mechanisms and focuses on how it applies to nonmarket strategy. The mechanism-based approach is not common in strategic management. Therefore, the first section (2.1.) is somehow introductory to the general mechanism-based perspective in science and section 2.2. further exposes nonmarket mechanisms identified in the literature. The last section of the theoretical part focuses on self-regulation as a component part of the mechanisms.

The following two chapters make up the methodological part. The first section of the third chapter (section 3.1.) describes the adapted research design. The research is conducted as an exploratory, cumulative case study (Garreau, 2020), seeking to provide new and previously overlooked insights regarding the self-regulation phenomenon. Research strategy based on the approach by mechanisms is in line with the positivist qualitative research paradigm. This part also covers the contextual elements - the empirical setting in the French food retail sector is presented along with the cases (sections 3.2. and 3.3.). The legislative framework and sectoral elements are fundamental in our analysis and cover the period from 2009 to 2019. The self-regulatory initiatives are selected from two companies - Auchan and E. Leclerc. Each case is drawn in one of the following domains: food waste prevention, policy on plastics, packaging and product labelling.

Next, chapter 4 provides details on a mechanism-based research strategy. This chapter comprises subsections regarding data collection, analysis, and research quality. Section 4.1. provides details on data collection on different levels. The data collection allowed the triangulation of multiple sources and methods. The primary data accounts for over 30 interviews conducted with the representatives of Auchan and E.Leclerc, sectoral experts from consultancy companies and national agencies, as well as competitors. In addition, the evidence regarding the legislative framework and evolution of the political environment was drawn from 16 official legislative or executive texts, 30 reports and studies officially issued by national agencies, and 15 documents provided by the industry federations. The industry-level data was enriched by 43 documents classified as grey literature. Besides the interviews,

the corporate-level data comprises secondary sources, including 51 documents regarding the Auchan company and 50 documents regarding E.Leclerc. Moreover, the data is complemented by nearly 800 press articles. Further, the consecutive steps of data analysis are outlined in section 4.2. To identify the nonmarket mechanisms relevant to self-regulation, I implemented the consecutive research stages to move from identifying the self-regulation phenomenon through the postulation and description of mechanisms to the proposition of the mechanism-based model integrating the mechanisms based on self-regulation as a nonmarket strategy. The last section of chapter 4 discusses the quality of the research.

The last part of the thesis begins with chapter 5, which outlines the research results. The analysis of ten trajectories mobilizing self-regulation as a nonmarket strategy allowed further determining the three nonmarket mechanisms based on self-regulation. These are (1) endorsing the voluntary commitment mechanism, (2) transforming the geography of power mechanism, and (3) shaping the regulation mechanism, all presented in section 5.1. Each mechanism's operating mode is decomposed into consecutive phases, and the common and divergent features are discussed. The mechanisms represent the interactions taking place in the nonmarket environment, where a voluntary corporate commitment results in the modification of the operating conditions. The stage of issue-settlement and main activities undertaken towards specific actors distinguishes them from one another. In section 5.2. the mechanisms-based model is proposed. It is built upon the characteristics of intertwining mechanisms and demonstrates the influence channels to alter the nonmarket environment.

Our conclusions are drawn in the last chapter, including a discussion on self-regulation's place among nonmarket strategies (section 6.1.) and research contributions (section 6.2.). The contributions are presented separately regarding the theoretical elements linked to the concept of self-regulation (its inclusion in the panoply of nonmarket strategies) and, more broadly, to the nonmarket strategy (*e.g.* interrelation of political activities, integrated strategies). I discuss the benefits of using a mechanism-based view in strategic research and the study's practical implications. Last but not least, limits and extensions are discussed (sections 6.3. and 6.4.).

The exhaustive bibliography and sixteen appendixes, demonstrating the intermediary results, among others, complete the dissertation.

PART 1 – THEORETICAL ELEMENTS

CHAPTER 1. SELF-REGULATION: INSIGHTS INTO THE NONMARKET STRATEGY

The first chapter focuses on the self-regulation phenomenon from the nonmarket strategy perspective. The following sub-section presents self-regulation characteristics according to business and management studies, as it is admitted that companies use self-regulation to pre-empt public regulation but also to tackle various societal issues. Then, in the following sub-section, I place self-regulation in the context of nonmarket strategy by analysing its drivers and potential nonmarket benefits. The sub-parts of this chapter are as follows:

- Self-regulation in management scholarship (1.1.),
- Self-regulation as a nonmarket strategy (1.2.).

Section 1.1 consists of three parts and focuses on the organizational self-regulation³ phenomenon as analysed in strategic management scholarship. First, I introduce the definition of self-regulation retained for the research purpose. Next, I look closer at different forms of self-regulation. Afterwards, section 1.1.2. reviews the strategic management scholarship on self-regulation. The last one outlines the main criticisms that have arisen over time. Section 1.2. presents the argument for considering self-regulation as a nonmarket strategy. First, it presents its drivers and determinants. Second, it reviews contextual and internal elements leading to self-regulation mobilization in the character of a nonmarket activity. Last, section 1.2.3. discuss how self-regulation may bring a competitive advantage outside the market.

³ The organizational self-regulation (individual corporate commitment) is considered as distinct phenomenon from co-regulation or sectoral regulation. In the regulatory scope, various intermediary types of regulation exist in the spectrum between two extremities, that is 'command and control' approach and liberal market.

1.1. Self-regulation in management scholarship

1.1.1. Definition and forms of organizational self-regulation

1.1.1.A – Definition and main characteristics

A multitude of institutional arrangements is considered self-regulation. Thereby, finding a single and congruent definition of the phenomenon is difficult. Self-regulation is widely explored in research areas like social science (Bartley, 2007), political economy (DeMarzo, Fishman, and Hagerty, 2005; Heyes, 2005; Haufler, 2001), and law (Black, 2001; Gunningham, 1995; Ogus, 1995, 1999; Rees, Gunningham, and Rees, 1997), among others. Moreover, a reach body of literature is issued from the crossroad between political science and management (Héritier and Eckert, 2009; Marx, 2008; Winter and May, 2001). The literature lacks definitional clarity, and even prominent scholars in strategic management use the rationale from social or political sciences. Self-regulation is commonly seen as soft law, which is, by its nature, the enunciation of the legally non-binding norm in a written form. The table below gives several definitions of self-regulation on the organizational level used in the literature. Following the table, the main characteristics are highlighted for further consideration.

Table 1. Definitions of self-regulation on the organizational level

Definition	Reference
Form of the regulation that relies substantially on the goodwill and cooperation of individual firms for their compliance.	Sinclair, 1997
The entity regulates itself, independent of others - the normative orders of private governments.	Gunningham & Rees, 1997
Intra-firm regulation: internal regulatory process induced by the government (not equate to voluntarism).	Black, 2001
Any system of regulation in which the regulatory target imposes commands and consequences upon itself (may be individual or collective).	Coglianesse & Mendelson, 2010
A unilateral commitment where the firm voluntarily initiates a responsible action not required by regulation and do not necessarily leading to productivity gains.	Giuliano & Linder, 2013

Compliance versus “beyond compliance” approach.

In line with the political studies, a clear shift in an analytical approach to self-regulation from compliance to beyond compliance can be observed over time. The initial focus on self-regulation as normative orders of private government (Rees et al., 1997) and the issue of compliance with legal or normative obligations (Sinclair, 1997) has been replaced by the notion of voluntary practice of triple bottom line (Steurer, 2013). Therefore, the fundamental distinction is between compliance-driven firms that aim to meet legal requirements and those that adopt more proactive strategies. When analysing compliance behaviour, one can apply two different lenses. The narrow vision refers to legal compliance, whereas a broad vision applies to norms, standards and social beliefs, therefore the firm’s ability to conform to normative expectations, e.g., social trends. The expected degree of corporate commitment (compliance or beyond) determines the self-regulation procedures and its potential to alter nonmarket environment.

Independent initiative versus external intervention

The Organization of Economic Cooperation and Development defines self-regulation as unilateral commitments of actors acting independently without any involvement of a public authority (OECD, 1999). It underlines the differentiation between the sectoral initiatives categorised as non-state regulation (e.g., industry standards, professional codes of ethics) compared to co-regulation (voluntary partnership programs between an economic actor(s) and public authorities). Various intermediary solutions have emerged between “no intervention” and “command and control” systems in the regulatory spectrum. However, this definition of self-regulation as an autonomous initiative raises the issue of interrelation with external factors. In fact, firms rarely operate in a regulatory vacuum. Indeed, such an approach is hard to consider in nonmarket research emphasizing the contextual elements of corporate policy.

Institutional and substantive dimensions

Self-regulation has two dimensions: institutional and substantive. The former tells us how the regulation is carried out (the form of institutional arrangement), and the latter, what is being regulated (Gupta and Lad, 1983). Self-regulation implies the autonomy of economic actors regarding the substance of how organization restraints its behaviour. The provision can be imposed on succeeding stages: specifying objectives, designing the regulatory solution and

its implementation, monitoring, and enforcing commitment. Also, it takes the form of either obligation of means (adopting defined measures without the guarantee of achieved outcome) or obligation of results (binding the organization to attain a predetermined result). However, the results do not necessarily articulate with productivity gains since self-regulation may be aimed at other than financial profits (Giuliano and Linder, 2013).

The overview of these characteristics allows precisising the object of this research: a firm's self-regulation. Therefore, the phenomenon of interest is described as an individual (on an organization-level) voluntary commitment that precedes legislation or goes beyond compliance. It may be operated under external (notably normative) pressure but is not directly induced by formal state intervention. As a consequence, for the purpose of this research, I adopt the following definition of self-regulation:

Definition of self-regulation

System of regulation in which the regulatory target imposes commands and consequences upon itself and where private ordering emerges independently from formal state intervention.

1.1.1.B – Classification of self-regulation forms

In management literature, the common practice is to define self-regulation by the type of actions identified as such, which can be considered disparate forms of self-regulation. The table below presents examples of organisational self-regulation forms.

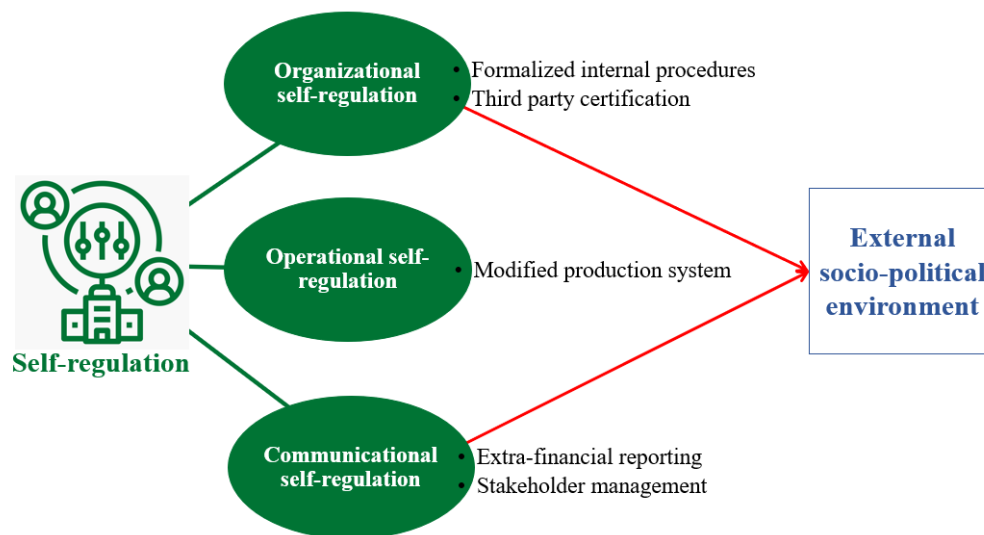
Table 2. Various forms of self-regulation on the organizational level

Forms	Description
Voluntary management practices	Voluntary management practices (called management systems when standardized) cover a variety of internally motivated actions aimed at an organizational change that enable a firm to make continuous improvements in a specific domain (Khanna and Anton, 2002a). The internal procedures may be linked to standard-setting (i.e. minimum standards of safety and quality) or rate-setting (i.e. grading of products).
Company labelling programs	Labelling programs allow companies to differentiate and ease the identification of a firm's practice by stakeholders and product or service quality by customers (Hemphill and Banerjee, 2015).
Product certification	Certification is not simply a marketing device but has become a prominent mode of social and environmental self-regulation. Various stakeholders use it to tackle information asymmetries and collective action problems (Potoski and Prakash, 2009) in global supply chains and customer relations.
Codes of conduct	A corporate code of conduct is a set of rules outlining an individual organisation's norms, rules, and responsibilities or practices (Jenkins, 2001; Kaptein and Schwartz, 2008). It can take the form of a board statement of principles afterwards formalized in an ethical chart or similar document. It is used to communicate internally or externally.
Business-to-business self-regulation	Firm self-regulation may have consequences on supply-chain, as the higher standards in an organization entail modifications in suppliers' behaviour (business-to-business SR) (Darnall, Jolley, and Handfield, 2008; Tzavara and Héritier, 2012).
Reporting & Information disclosure	Sustainability reporting and information disclosure are powerful means for companies to promote their principles and communicate on performance. Nevertheless, as many companies find themselves accused of greenwashing and symbolic self-regulation (Kim and Lyon, 2015), this action may be a double-edged sword. re are powerful means for companies to promote their principles and communicate on performance. Nevertheless, as many companies find themselves accused of greenwashing and symbolic self-regulation (Kim and Lyon, 2015), this action may be a double-edged sword.

Self-regulation may take the form of various institutional arrangements: collective agreements that may be non-legally binding and/or entail no government involvement; bilateral arrangements between firms and the governments; and unilateral adoption of standards. Intra-firm regulation (on the organization-level) refers to the design and operation of systems and procedures inside a single organization and encompasses various practices of triple-bottom-line management. Codes of conduct and supplier auditing are common practices among leading brands (Jenkins, 2001; Peters, 2010). While some practices may be characterized by simple in-house adoption, others are implemented under third-party certification (Demirel, Iatridis, & Kesidou, 2018).

The phenomenon of firm self-regulation encompasses many initiatives aimed at voluntarily modifying organizational practices to limit the negative or enhance the positive externalities. **The functional classification of self-regulation distinguishes the following three categories: planning and organizational practices, operational practices, and communicational practices.** Whereas operational practices have a higher effect on the natural environment and financial performance, the remaining two categories of voluntary corporate activities have a significantly higher impact on the external socio-political environment (including customers, regulatory institutions and community) (González-Benito and González-Benito, 2006). Thus, more opportunistic self-regulation strategies might exist based fundamentally on implementing organizational and communicational practices and deploying a minimum of operational ones.

Figure 2. Functional classification of self-regulation forms and their impact on the external environment



Organizational self-regulation

The category of organizational self-regulation covers initiatives that formalize a firm's behaviour, including the company's governance. This type of self-regulation is operationalized by creating formal structures within organisations (such as compliance offices and internal management systems) and their integration into organizational decision-making processes. It refers to the degree of establishment of various procedures, including defining general policy on an issue, its objectives, monitoring and implementation, assessing the outcomes and accountability. The existence of standardized procedures allows a company to

follow a comprehensive strategy rationally but does not guarantee improved performance. Moreover, self-regulation seems to work best when formalising existing practices (incremental change). Where significant changes to the status quo are needed, self-regulation fails to bind together diverse actors within an organization which are differentially threatened by those changes (Eden, 1997). Management systems might be implemented internally or established via a specific normative institution – third-party certification⁴. It is demonstrated that in-house adoption is privileged by firms primarily seeking to reduce their production costs and improve efficiency (Darnall et al., 2008), whilst external certification is used to enhance legitimacy by signalling improved performance to stakeholders (Castka and Prajogo, 2013). Also, implementing formal management systems may translate stakeholder pressures into innovation initiatives (Kawai, Strange, and Zucchella, 2018).

Operational self-regulation

The operational improvements aim to change production and operations systems. They are integrated within internal policies of product and process design, manufacturing, and operational methods. If successful, they bring tangible results (not only financial) and help companies improve their performances (*e.g.*, higher capacity utilization rates and fewer work accidents). These initiatives are essential to enhance positive impact in terms of corporate social and environmental footprint, limit negative externalities (*e.g.*, inclusive organisation, reduced resource consumption, waste generation), and reduce operations costs (*e.g.*, optimisation of travel policy or supply chain). Often, the optimization of firm operational practices results from best practice sharing and resource pooling or coordination. These initiatives' social visibility is limited unless the company decides explicitly to communicate about them.

Communicational self-regulation

Social demand for transparency enhances communicational self-regulation. Also, public authorities require information on companies' extra-financial performance and operational risks, among other things. Corporate voluntary information disclosure aims to reveal to the company's nonmarket environment (primarily institutional) the actions undertaken in favour of society (Reid and Toffel, 2009). For successful differentiation, firms must provide credible information about their efforts. The communicational practices may consist of periodic

⁴ The most common certification schemes are those set up by International Organization for Standardization (ISO).

reports elaboration or regular voluntary information diffusion. Information disclosure on corporate initiatives is an essential element of organizational commitment. Moreover, companies under the pressure of activists may engage in collaborative programs (Albareda, 2008; Boddewyn and Doh, 2011; den Hond, de Bakker, and Doh, 2015) and share information to construct their institutional environment collectively.

In conclusion, self-regulation encompasses various practices with the common characteristic: an economic actor voluntarily constraining its own behaviour on issues of general societal interest. As demonstrated above, voluntary initiatives may follow different logic – resistance, conformity, and over-compliance. The following sub-section presents the historical review of self-regulation in management scholarship.

1.1.2. Strategic management scholarship on self-regulation

The literature review on the “self-regulation” concept within journals in management and organizational studies gives vastly disparate results in various domains with a significant predominance of human resources management (typically regarding self-regulation by individuals in the workplace context). Another essential domain of application is corporate sustainability/green management. In business research, three dominant perspectives on self-regulation can be identified: (1) neo-institutional perspective focusing on normative constraints put on organizations, isomorphism and institutionalization of practices (Ansari, Fiss, and Zajac, 2010; Briscoe and Safford, 2008; Rees et al., 1997), (2) CSR perspective (Sheehy, 2015), and (3) regulatory perspective, primarily influenced by the political economics, which has unfolded to nonmarket strategy approach.

The concepts of self-regulation and CSR are not equivalent and shall not be confounded. Self-regulation remains a firm’s voluntary activity and, depending on the issue it covers, may or may not be included within organizational CSR policy (Hart, 2010; Lynch-Wood, Williamson, and Jenkins, 2009). On the other hand, the evolution of legislation goes in a direction where more “responsible behaviours” (such as reporting, impact assessment, public consultations, better working conditions etc.) are considered mandatory (Gatti, Seele, and Rademacher, 2019). Thus, these two concepts can partially overlap (Gond, Kang, and Moon, 2011). It has to be clearly stated that the phenomenon of self-regulation can be observed beyond the scope of what is commonly considered social and environmental concerns. Growing phenomenon and consequently academic interest in self-regulation is observed in domains such as finance and accounting (Emeseh et al., 2010; Omarova, 2011), development of new technologies or data privacy and security issues in the digital economy (Listokin, 2015; Megali, 2020).

However, the empirical self-regulation phenomenon studied by strategic management scholars refers almost exclusively to voluntary environmental initiatives. It relates to a “firm’s adoption of environmental policies or performance standards that exceed the requirements of government regulations” (Christmann, 2004: 747). This definition pinpoints the “beyond compliance” component. The main common characteristic of self-regulation retrieved from management literature is the lack (or highly limited) of political/governmental involvement

(Delmas and Montes-Sancho, 2010). Industry self-regulation (collective political strategy) remains the dominant object of analysis, but individual initiatives are also under investigation.

Management scholars examined various forms of private institutions for environmental protection, especially international standards (for instance, ISO 9001 or ISO 140001) (Boiral, 2012; Brunsson, Rasche, and Seidl, 2012; Christmann and Taylor, 2006; Delmas and Montiel, 2008; Gupta and Innes, 2014; Montiel, Husted, and Christmann, 2012; Terlaak, 2007) and information disclosure (Lyon and Shimshack, 2015; Marquis, Toffel, and Zhou, 2016; Miller, Fugate, and Golicic, 2017). Also, scholars investigated the initiatives and their results in specific sectors, like mining (Dashwood, 2014), the chemical industry (King and Lenox, 2000), advertising (Rotfeld, 2010), retail/food (Hemphill and Banerjee, 2015; Lee, 2009) and apparel (Hemphill, 1999). Within decades, successive predominant themes have emerged, and the analytical approach moved from the regulatory perspective to contingency one. Further, a presentation of succeeding approaches is outlined.

1.1.2.A – Self-regulation as a control strategy

The early research on self-regulation flourished in the 1980s, and the general position was that corporate responsible conduct depends on creating and maintaining opportune institutional conditions, which encourage businesses to behave responsibly as a matter of self-interest. “Exploratory economic, organizational and political analysis” carried by Gupta and Lad's, allowed them to consider self-regulation as private regulation that may complement or supplement the state one (Gupta and Lad, 1983: 417). While opening a discussion on distinctive substantive forms of regulation and their implementation, the authors identified several alternative institutional arrangements (e.g. government ownership, direct state regulation, self-regulation and stakeholder participation) and claimed that depending on the context, they may produce similar or better results either alone or in conjunction with other regulatory regimes. Through the analysis of deregulated sectors, Garvin went a step further and suggested that the most desirable policy option is hybrid systems combining industry standard setting with government oversight (Garvin, 1983). According to him, governmental enforcement is a major condition for self-regulation to produce socially desirable results.

It was not until the next decade that the discussion on business's social and environmental impact was linked to the dynamics that shape the institutional landscape of

contemporary market economies. In the early 1990s, in the context of crisis and disaster management, self-regulation was analysed through the lens of risk management perspective (Kharbanda and Stallworthy, 1991; Smith and Tombs, 1995). Basically, the authors claim that self-regulation is equivalent to compliance policy. The role of industrial operators is to ensure that they comply with current legislative requirements without interference from the various regulatory authorities or policing actions. Self-regulation as a control strategy was considered a key component of regulatory regimes and has become a widely spread business practice.

1.1.2.B – Competitive approach to self-regulation

The economic perspective, in which voluntary corporate commitment is seen as a trade-off between social benefits and private costs, was overcome in the 1990s. Porter and Linde used a dynamic paradigm to describe competitive advantage as a “capacity for innovation and improvement that shift the constraints” (Porter and Linde, 1995: 98). One of these constraints that firms must deal with is regulation and public policy. Due to stricter environmental laws, competitive advantage may result from a consistent strategic proactive approach to the natural environment (Hart, 1995). Indeed, in the mid-1990s, the strategic use of self-regulation in environmental protection was recognized (Gunningham, 1995). The term “greenewal” (green + renewal) appeared in the literature to describe the purposeful corporate policy and self-transformation effort to become more environmentally responsible (Shrivastava and Scott, 1992). Environmental conservation is a source of competitive advantage since it increases the company's productivity, for example, by limiting expenditure on energy and raw materials.

More specifically, Martinet and Reynaud (2004) identify the following benefits of self-regulation: limitation of environmental and legal risk, reduction of costs and wastage, gain in reputation, market share and creation of new products. A company that recognises that environmental protection is an opportunity may benefit from self-regulation as a source of superior performance independently of the general regulatory regime. Nevertheless, as long as environment-related investments are a source of competitive advantage, this correlation intrinsically motivates companies to go beyond legal compliance. Consequently, industrial competition would promote more sustainable and environmentally friendly practices, which is not always the case.

In the following decades, scholars demonstrated a high interest in self-regulation as a source of competitive advantage. Voluntary integration of sustainability issues into business strategy provides firms with numerous private benefits that enhance their competitiveness in the market and nonmarket environments (Hoffman, 2007). The flourishing literature on ‘signalling green’ has brought contributions regarding various advantages in the following domains: regulation, public relations, and innovation (Darnall and Carmin, 2005; Heyes, 2005). Over time, research interest regarding strategic voluntary initiatives has shifted from the general inquiry “does it pay to be green?” (Ambec and Lanoie, 2008) to the contingency approach asking a more nuanced question, “when does it pay to be green?” (Dixon-Fowler et al., 2013) and provided an in-depth analysis of advantages and drawbacks of signalling green (Darnall and Aragón-Correa, 2014; Lyon and Maxwell, 2011)

Simultaneously, scholars became interested in greenwashing (Lyon and Maxwell, 2011; Ramus and Montiel, 2005; Walker and Wan, 2012), and the problem of symbolic versus substantial self-regulation was raised (Short and Toffel, 2010). The cases of firms disseminating false information about their commitments to give a responsible public image were pointed out. A different bunch of literature has developed analysing the divergence between voluntary corporate commitment and corporate practice (Berrone, Fosfuri, and Gelabert, 2017; Bowen and Aragon-Correa, 2014; Delmas and Burbano, 2011; Lyon and Montgomery, 2015; Marquis et al., 2016).

In fact, self-regulation is not considered an optimal solution due to multiple regulatory failures and business remains often criticised for its initiatives seen as a smoke screen. The following sub-section will present various objections raised by researchers.

1.1.3. Critics of organisation-level self-regulation

While self-regulation has become a more prominent and widespread institution, it has not escaped significant and multi-layered criticism. Researchers pointed out multiple weaknesses of self-regulatory regimes by investigating various types of private institutions, the conditions in which they emerge, their characteristics and effects. Seemingly, self-regulation is not a universal solution to cope with businesses' negative externalities.

Self-regulation has been chiefly criticised for ineffectiveness and lack of transparency. Low standards and doubtful enforcement procedures are the principal weaknesses identified so far (Rees et al., 1997). In the 1990s, after a series of industrial accidents having a significant negative environmental impact, firms focused on enhancing internal procedures on major hazard control and occupational safety. This resulted in the first attempt from scholars to consider if self-regulation was an appropriate response to risk management (Kharbanda and Stallworthy, 1991; Smith and Tombs, 1995). Their conclusions seem rather disadvantageous for self-regulation, but still, it emerged as an alternative mode of governance advertised by public authorities. Consequently, an increasing reliance on the social responsibility of firms rather than on regulatory guidelines might result in a risk of diminishing overall welfare (Calveras, Ganuza, and Llobet, 2007).

Scholar suggests that self-regulation only works when it is specific, strictly implemented and monitored (Kolk and van Tulder, 2002). Effective self-regulation requires the adoption of process and outcome metrics, monitoring and, ultimately, enforcement procedure, which counts for behavioural change drivers (King and Toffel, 2009). In addition, successful implementation depends on self-regulatory routines designed to develop the organization's capacity to comply with existing legal obligations (Short & Toffel, 2010). Among the conditions that must be met to secure the successful implementation of a proactive self-policy, one finds investment in training and equipment, the establishment of clear goals and targets, a bounded system of continuous improvement, and the involvement of key stakeholders (Hart and Ahuja, 1996). Therefore, the issue of implementation and monitoring is at the core of self-regulation effectiveness. Research also has shown that self-regulatory initiatives tend to fail without external deterrence pressures, such as the possibility of fines, sanctions and other penalties (McCaffrey & Hart, 1998; King & Lenox, 2000; Parker, 2002; Short & Toffel, 2010). However, others counterargument that the need for such sanctions is

overstated because the institutional structure of self-regulation can control behaviour through informal means of coercion, the transfer of norms, and the diffusion of best practices (Nash & Ehrenfeld, 1997).

A large consensus regarding the benefits of participating in voluntary self-regulatory schemes (Darnall & Carmin, 2005; Potoski & Prakash, 2004; Prakash & Potoski, 2006), was challenged by Lyon and Maxwell (Lyon and Maxwell, 1999, 2004, 2014). In successive research projects, they analysed various conditions under which signalling green may be advantageous for firms, and their conclusions were inconsistent. When a company operates in an environment that grants some regulatory flexibility, it may decide not to signal superior environmental performance (Lyon and Maxwell, 2014). Also, stronger environmental proactiveness likely leads to more sensitivity to stakeholder pressures (Buysse and Verbeke, 2003). Therefore, companies may be “strategically silent” about their environmental achievements and, for instance, do not communicate about external certifications they hold. Such a situation might occur when at a specific timespan, the firm’s actions are misaligned with the implied claims associated with the certificate (Carlos and Lewis, 2018). The decoupling of practices implementation from communication may be caused by the fact that not all type of organizations is equally rewarded for their environmental efforts, as the impact of environmental responsibility on the reputation varies in strength (Graafland and Smid, 2004). This particular phenomenon of understating environmental or social efforts is known as ‘brownwashing’ (opposite of greenwashing) (Kim and Lyon, 2015).

This discrepancy is mainly seen as the problem of credible commitment and examined from the ethical perspective under the banner of “symbolic or substantial” self-regulation (Delmas and Montes-Sancho, 2010; Ferrón Vílchez, 2017; Perez-Batres et al., 2012; Rodrigue, Magnan, and Cho, 2013; Walker and Wan, 2012). Depending on the self-regulatory policy character (measure-oriented or result-oriented), the fact that all prescriptions are respected and correctly implemented does not necessarily lead to the same outcomes regarding performance enhancement (Wijen, 2014). If the primary motivation of firms is to achieve legitimacy benefits through third-party certification, they may not implement standard requirements sufficiently to realize the standard's intended performance outcome (Aravind and Christmann, 2011).

The role of corporations in the democratic process raises other questions. The early criticism of business self-regulation is based on the argument that an “individual firm’s

interests as a competitor in the marketplace often diverge from its interests as part of the wider society” (Maitland, 1985: 133). Self-regulation may be seen as a tool that serves the private interest and is not aligned with public objectives. Moreover, it lacks accountability and democratic legitimacy. In general, there is a risk that public authorities over-rely on self-regulation as a solution to environmental and societal issues. Self-regulation by corporations takes place through soft law with a low level of obligation and often imprecise rules, hardly comparable to alternative solutions. Hence, such self-regulation conflicts with the new global political responsibilities that companies must take on, along with a broadened scope of responsibility.

Self-regulation constituted by proactive actions is particularly problematic as it is pursued instrumentally to prevent hard laws (Lock and Seele, 2018). Also, critics rooted in the neo-Gramscian approach consider self-regulation an adaptation and accommodation strategy to protect a firm’s market position. According to Levy and Nevell, various proactive initiatives, for instance, environmental innovation, partnerships with stakeholders or the establishment of private standards, are all ‘political’ activities (Levy and Newell, 2002). To answer this point, Parker theorised about the “open corporation” that commits to self-regulation, acquires specialized skills and, above all, institutionalizes the purpose of self-regulation by responding to external regulators and stakeholders’ expectations (Parker, 2002).

Finally, scholars have raised concerns regarding the consequences of competition between self-regulating companies. Institutional proliferation may provoke instability in the business environment, as the need for private benefits is a condition for the supply of private regulation. Historically, scholars noted the situations where competitive pressures have prevented firms from acting responsibly, whereas self-regulation of the individual firm become a competitive disadvantage (unless other firms follow) (Maitland, 1985). More recently, a research stream on tetranormalisation questioned the role of private politics in generating normative conflicts, while attempting at proposing solutions to deal with competing schemes and contradictory prescriptions (Pigé, 2019).

As demonstrated, self-regulation remains widely criticised as an alternative governance institution. Nonetheless, it is widespread in business practice. Even if “private regulation cannot be a universal, and may not be a long-term, solution” (Büthe, 2010: 8), it can address various challenges in the business environment.

1.2. Self-regulation as a nonmarket strategy

In the literature, voluntary corporate commitment is often studied in both the market and regulatory context. Applying self-regulation to the nonmarket environment requires a more comprehensive approach. Thus, within the theoretical part, section 1.2 reviews the literature elements that indicate how self-regulation operates in social and political contexts.

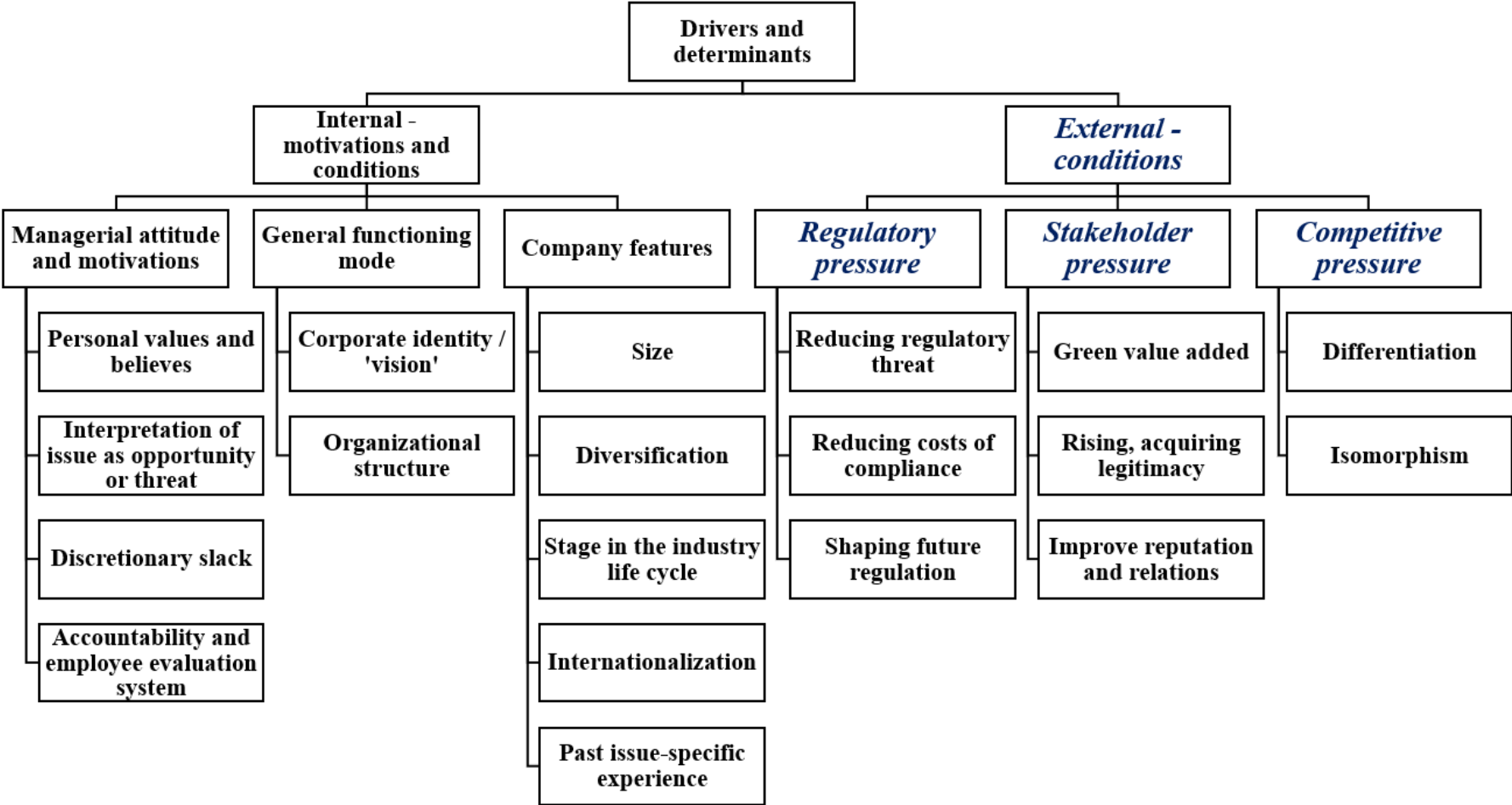
This section focuses on components of self-regulation as a nonmarket strategy. First, it exposes drivers and determinants of self-regulation, focusing on external ones stemming from the nonmarket environment (section 1.2.1.). Further, it outlines factors raising the probability of leveraging self-regulation as a nonmarket strategy (section 1.2.2.). Next, as scholars consent to the numerous financial and regulatory advantages that self-regulation may offer, section 1.2.3. present the broader vision by exposing the nonmarket benefits of voluntary corporate commitment. Finally, I analyse the sources of competitive advantage outside the market, which suggests that self-regulation can be categorised within proactive instead of defensive nonmarket strategy.

1.2.1. Self-regulation drivers and determinants

This section reviews the literature to identify corporate self-regulation's main drivers and determinants. This review draws on a broader scope of literature linked to environmental management, considering that corporate environmental proactivity is an example of self-regulation. A choice of specific self-regulation form depends on the type of external pressure, the strategic importance of the issue, the firm's capabilities to address it, and expected outcomes (Berrone et al., 2013; Christmann and Taylor, 2002; Delmas and Toffel, 2008; Demirel, Iatridis, and Kesidou, 2018). For instance, Khanna and Anton analysed what characteristics impact the adoption of two types of practices: organizational (type I) and operational and communicational (type II). They found that regulatory threats have a more substantial impact on the adoption of organizational practices. In contrast, market opportunities (improving competitive advantage, gaining market share) and improving stakeholder relations are more likely to impact adopting type II practices. In addition, firms with lower performance per unit sales are more likely to carry on operational improvement and communicational activities (Khanna and Anton, 2002b).

The strategic choice is driven and conditioned by multiple internal and external factors, as demonstrated in the figure below. Internal drivers and determinants are linked to the organization's motivations and conditions of operation, whereas external ones are identified as conditions, specifically external pressure on the company.

Figure 3. Drivers and determinants of self-regulation



The factors indicated in figure 4 further affect self-regulation policy implementation and its outcomes. After a brief presentation of internal drivers, external conditions leading to a firm's self-regulation are discussed, as they are directly linked to the nonmarket environment.

1.2.1.A – Internal drivers – motivations and conditions

The intra-organizational dynamics play a compelling role as drivers of engagement in voluntary business practice. Internal determinants of proactive regulatory strategy are linked either to individuals within the organization or to a firm's general functioning mode.

Managerial attitude and motivations

According to the managerial view of strategy choice, the commitment of a firm's top management is highly beneficial, if not essential, in promoting firms' proactive nonmarket behaviour (Ozer, 2010). This link between executive discretion and corporate commitment has been empirically demonstrated. Scholars find strong and consistent evidence that the environmental values and beliefs of upper management, their conviction of moral responsibility for sustainable development, and their interpretation of issues as opportunities or threats affect a corporate strategy and engagement in environmental protection (Colwell and Joshi, 2013; Egri and Herman, 2000; Wu, 2009). Likewise, the accountability for environmental issues on the individual level and incorporation of environmental performance criteria in employee evaluation systems moderates managerial commitment. In addition, discretionary slack, defined by Sharma as time and resources which are at the disposal of managers, determines how middle management incorporates the environmental paradigm in daily operations (Sharma, 2000). The role of middle management seems to be underestimated in the research but is highly important, as they ought to deal with causal ambiguity and unpredictability of environmental policy consequences.

General functioning mode – culture and structure

The corporate identity, understood as a 'vision' of how the company wants to be perceived by the public, is one of the legitimacy sources. This vision, generally incorporated in organizational culture shared by employees and managers, constitutes a joint base upon which a voluntary effort can be built. Consequently, the more significant mobilisation on every hierarchical level, the more far-reaching the commitment for a firm.

Also, the relationship between organizational structure and strategy is broadly recognized. An appropriate management structure developed following the general structure of the organization allows for integrating nonmarket issues into the strategic process of the firm (Atkinson, Schaefer, and Viney, 2000). Creating a specific cell directly responsible for the topic helps to deliver support to other organizational departments or business units in their operational functions and creates advantageous conditions for implementing successful self-regulation initiatives. Moreover, the organizational structure impacts how issues are perceived and dealt with, thus, eventually, on self-regulation strategy in its conception and implementation. The cultural frames of different corporate departments modify how nonmarket issues are decoded and managed (Hoffman, 2001). Corporate functional departments, mainly marketing and legal affairs, have an active role in the rising awareness of and shaping receptivity to specific external pressures within the organisation (Delmas and Toffel, 2008). Likewise, transversal/support departments, non-directly responsible for nonmarket issues, may influence the strategic choice for different self-regulation forms.

Company's features

A primary structural variable that significantly positively impacts firms' attempts at self-regulation is company size, usually measured as the number of employees or turnover. The more frequent engagement from large companies is mainly explained by the available resources (organizational slack), higher external pressure and the scale of their social and environmental impact (Berrone et al., 2013). Large enterprises with more sophisticated internal control systems have a much greater capacity for self-management and self-monitoring than their smaller counterparts (Gunningham and Sinclair, 2002). It has been proved that other firms' characteristics, like diversification or stage in the industry life cycle, are essential in defining the optimal form of voluntary corporate engagement (McWilliams and Siegel, 2001). The diversification that broadens companies' business interests is reflected in the different and more varied perceptions of societal impacts. In cases of a higher degree of internationalisation in terms of geographical location, exposure to various legislative jurisdictions may push a company to self-regulation. That is to reduce the uncertainty, as they may seek to define the global policy and practice which meet the most stringent requirements in force in relevant countries (González-Benito and González-Benito, 2006). The firm's past experience and performance condition self-regulation practice (Delmas and Montiel, 2008; Delmas and Toffel, 2004). For instance, firms do not act the same way when considered environmental leaders or polluters, as they do not face the same incentives, potential benefits

or pressure. Therefore, self-regulation is path-dependent regarding resource accumulation for moving across different stages of issue strategic management. Also, strategic embeddedness implies the coevolution of various resources and competencies essential for moving from reactive to proactive strategies. Firms' characteristics moderate the effects of external pressure.

Firms and industries vary according to the degree of actual or potential social harm they produce and the propensity for these negative impacts to attract public attention (Hoffman and Ocasio, 2001). Thus, firms may be subjected to different expectations within the same industry due to their visibility and market positioning. A firm's positioning may also modify the importance given to the specific types of stakeholders (internal/external and primary/secondary). Further, the external drivers are reviewed in detail as they arise mainly from a nonmarket environment.

1.2.1.B – External drivers – conditions

The goal of self-regulation is to contain or control firm behaviour when no legally binding obligation exists (regulatory void or failure). Although, it is not excluded that organization acts under pressure. The literature identifies two main types of external forces: regulatory threat and social licence (Berrone, Fosfuri, Gelabert, & Gomez-Mejia, 2013; Lima & Núñez, 2015; Reid & Toffel, 2009; Shaffer, 1995). Gupta and Innes identified different varieties of pressure for corporate environmentalism: regulation, liability, and private politics (Gupta and Innes, 2014). In addition, the competitive pressure put by other companies within or across the sectors ought to be considered as an external driver for self-regulation.

Regulatory pressure

From the institutional perspective, regulatory and normative pressures (according to public authorities or public opinion) (North, 1991) make it more attractive for the focal firm to self-regulate. Regulatory pressure is typically exerted by government or executive agencies. Even though the statutory law is decisive in constraining firms, pressure primarily emanates from its enforcement (Berrone et al., 2013). Relying on self-regulation to mitigate regulatory pressure results in a constant interplay between an economic actor and public authorities. In

fact, some form of governmental oversight and the threat of direct regulation in the future often coexist alongside firms' self-regulation (Winter & May, 2001).

The leading theory in strategic management is that firms self-regulate to pre-empt the threat of government regulation (Delmas, Lyon, and Maxwell, 2019; Maxwell et al., 2000). Organizations often respond to threats of new legislation or other binding rules by adopting self-regulation to credibly signal to the public authorities that no regulatory intervention is necessary to attain desired behaviour. Self-regulation as a solution to avoid new regulations allows companies to limit risk and uncertainty by taking advantage of a predictable framework for their business activity (anticipated adjustments to future regulations, reduced compliance costs). Strategic behaviour theory provides another explanation of self-regulation motivation under regulatory pressure. A self-regulating firm may obtain a competitive advantage in the form of favourable future regulation, e.g. barrier to market entry of new players (Dean and Brown, 1995). Also, self-regulation unfolds due to the development and availability of new technologies, a constantly evolving state of scientific knowledge and continuous innovation (Stefanadis, 2003).

On the other hand, government, state agencies or third parties may encourage private initiatives by recognising and publicising self-regulation. Besides, public authorities often seek to ease firms' self-regulation through various regulatory incentives that take the form of technical and financial assistance (Anton, Deltas, and Khanna, 2004).

Stakeholder pressure

Some research points to stakeholder pressure as a central determinant factor for self-regulation while considering other types of pressure as moderators of intensity and corporate perception (González-Benito and González-Benito, 2006). Stakeholders are individuals and groups who are affected by a company's actions but also those who can affect the company's performance (Freeman, 1984). Stakeholder pressure can be defined as "the extent to which the focal organization is held accountable for its actions and decisions regarding product design, sourcing, production, or distribution to stakeholders" (Wolf, 2014: 321). Firms may face pressure from various groups⁵ to improve their management, like local communities or media,

⁵ An extensive conceptualization includes large scope of stakeholders divided into two groups, that is internal and external. Employees and shareholders represent the former, whether the latter is composed by following categories: rivals/competitors, customers, suppliers, trade associations, local communities, NGOs,

which are components of the nonmarket environment. The general objective of self-regulation in responding to stakeholder pressure is to improve relations with concerned actors. Consequently, an organisation aims to gain legitimacy and acquire a better reputation to foster organisations' sustainable growth.

Social licence is defined as “demands on and expectations for a business enterprise that emerge from neighbourhoods, environmental groups, community members, and other elements of the surrounding civil society” (Gunningham, Kagan, and Thornton, 2004: 308). Rising environmental awareness in society results in a higher degree of pressure put by various ad-hoc built groups. Indeed, the inclusion of additional, nonmarket issues into corporate strategy results in the company's alignment with its stakeholders' growing societal and environmental concerns and expectations (Buisse and Verbeke, 2003). Civil society groups and social activists are considered the most common demanders of private regulation (Büthe, 2010). They may be categorised as confrontational or cooperative (Baron, Neale, and Rao, 2016).

Local communities can impose coercive pressure on companies by activism and filing citizen lawsuits. In addition, more significant social pressure was noted in communities with higher political implications (electoral participation, membership in environmental associations) (Maxwell et al., 2000), as they can exert pressure through their vote in local and national elections. The pressure is exerted on different organizational levels, depending on the type of stakeholders at its origins. For instance, community pressures are often directly targeted at facilities in specific locations, whereas shareholder pressures target the corporate level (Delmas and Toffel, 2004). Indeed, stakeholder pressure is exercised differently depending on the country of operations, legal context, sector of activity, etc. Within some industries, companies share reputation commons and are subjected to a threat of sanction for negative externalities, even though their behaviour remains exemplary (King, Lenox, and Barnett, 2002; Reid and Toffel, 2009).

Scholars who analysed the linkages between corporate environmental strategies and stakeholder management found that proactive companies are more disposed to attach importance to their internal primary stakeholders than external ones. According to the

regulators/legislators - the national (and subnational) governments and public agencies, the media, financial institutions and socially responsible investment (SRI) funds, international treaties and agreements. In addition, the multinational companies have to deal with domestic and international stakeholders. This list corresponds to stakeholders identified by scholars in the corporate environmental strategy literature (Buisse and Verbeke, 2003; Henriques and Sadorsky, 1999).

stakeholder management perspective, more proactive nonmarket strategies are correlated with the number and diversity of stakeholders, as higher stakeholder pressure leads to an increase in corporate nonmarket activities (Kassinis and Vafeas, 2006). With no distinction, all firms find that international agreements are critical as they may provide the appropriate institutional environment for business activity.

To answer stakeholder pressure, firms develop initiatives to improve public information disclosure and public participation in decision-making. Firms seek publicity in the press and media, which are instrumental in shaping public opinion in favour of (or against) a company (Buisse and Verbeke, 2003). Further, engagement with the community is essential for companies with a direct and visible negative impact on the natural environment. In terms of sustainable development, it is necessary to establish a long-term corporate vision shared by all relevant stakeholders (Hart, 1995). Indeed, diverse groups may pull their interest in slightly opposite directions, and the expectations may differ across different stakeholder groups, making it difficult for organizations to react to them all. Otherwise, firms experiencing conflicting demands from multiple stakeholders gain additional room for manoeuvre than when external demands are uniform. Eventually, under comprehensive stakeholder management strategy, the common interest in sustainability issues leads to the broader public consensus.

Competitive pressure

Competitive pressure impacts a firm's adoption of self-regulation and its form. The competitive environment is the dynamic external system in which a business is under constant pressure from its direct and indirect competitors, suppliers and customers. Thus, the competitive pressure varies depending on the industry's structural characteristics (market concentration, maturity, natural entry barriers, geographic scope, field cohesion, etc.),

It is expected that the stage of the industry life cycle influences the adaptation of self-regulation, knowing that in mature markets (such as food, cosmetics, and financial services), implementing environmental differentiation is more common (McWilliams and Siegel, 2001). Other factors may influence the uptake of self-regulation: R&D spending, advertising intensity, proximity to competitors, the percentage of government sales, consumer income, and the tightness of the labour market. Consequently, diverse market forces favour strategic change that diverges from institutional norms.

Through private regulation, companies may answer institutional pressures from the market constituent. Corporate self-regulation should fit the strategic balance theory when introducing a new private rule to the institutional landscape. A moderate level of novelty is recommended as a firm shall position itself ‘as different as legitimately possible’ (Deephouse, 1999: 147). This strategic balance position is situated at an intermediate level of differentiation - the firm benefits from the reduced competition while maintaining its legitimacy. The interplay between market and nonmarket forces enact new opportunities for companies to adopt through self-regulation different, optimally distinct competitive positions (Zhao *et al.*, 2017).

To sum up, the diverse determinants and drivers discussed in this section are reflected in the adoption of self-regulation by a company. Naturally, different external pressure sources (in the market and nonmarket settings) are not mutually exclusive, and various regulatory, social and competitive drivers may coincide. Investigation of the relations between various antecedents of self-regulation – regulatory forces, public concern, competitive advantage, and top management commitment – demonstrated that depending on the overall environmental impact of the industry sector, various antecedents might have direct, mediating or moderating effects. For instance, in the high environmental impact sector, the grates impact is from public concern, followed by regulatory forces. On the contrary, competitive advantage significantly impacts corporate environmentalism, followed by regulatory forces in the moderate environmental impact sector. Top management commitment has strong direct and mediating influences in both industry groups (Banerjee, Iyer, and Kashyap, 2003).

The perception of the predominant type of external pressure impacts the characteristics of self-regulation. Early adopters of new practices are often motivated by technical gains, while contagion-like mechanisms (coercive, imitative and normative pressures) drive other actors (York, Vedula, and Lenox, 2018). A more substantial regulatory pressure and expectations from mandatory regulations would likely lead to internal policies and standards implementation. On the other hand, firms’ efforts to improve competitiveness by establishing a positive reputation and image and *in fine* gain stakeholder goodwill are reflected in implementing a substantial policy of continuous improvements (Khanna and Anton, 2002b).

One finds several nonmarket forces among the external factors influencing a firm's self-regulation. The following sections present the determinants of self-regulation as a nonmarket strategy and specific benefits obtainable in the nonmarket environment.

1.2.2. Leveraging self-regulation in the nonmarket environment

The decision to engage in a nonmarket strategy is likely a complex one driven by a relatively large number of factors. The antecedents of private firms developing different strategies to influence public policy are widely explored in the literature (Lawton et al., 2013; Mellahi et al., 2016; Wrona and Sinzig, 2018). Nevertheless, the general framework on nonmarket strategy drivers seems unsatisfactory to predict the mobilisation of self-regulation in the nonmarket environment, as distinct circumstances guide its implementation. Depending on the theoretical background used to explain the determinants of firm behaviour, the factors rising the probability of leveraging self-regulation as part of the nonmarket strategy can be categorised into an issue related, internal, and external, as presented in the table below. I develop a specific analysis of contextual and internal elements leading to self-regulation mobilization as a nonmarket activity.

Table 3. Factors rising the probability of leveraging self-regulation in the nonmarket environment

Issue related	External	Internal
High issue saliency An early stage of the issue lifecycle	Operating in an environment with incomplete or captured institutions Low governmental pressure An institutional environment with a culture of transparency Strong civil society Social pressure pulling stringer regulation Competitors under direct pressure A low number of political actors with a stake in an issue	High vulnerability to institutional pressure due to significant harm potential Previous experience in successful SR Capability to acquire value from SR Identified the firm's nonmarket capabilities

Issue-specific factors are linked to the public policy issue stage, its saliency and the level of competition that arises regarding the topic (Seeringer, 2016). A firm tends to act upon an issue judged critical from its point of view. The temporary perspective is equally important, as self-regulation is recommended as a viable alternative to legislation in an early stage of the issue lifecycle before the issue settlement is transferred to the legislative body.

External drivers arise from the political system and regulatory regimes that firms operate in, industry concentration and social pressure. Firstly, self-regulation is more likely to occur in environments characterized by incomplete institutions, as the environment is more

suitable for private ordering. Self-regulation is aimed at the institutional proliferation and is considered a bridging strategy helping to close the institutional gap. Secondly, in the context of captured institutions, insider firms may choose to self-regulate and share some of the value gained from institutional asymmetry with critical stakeholders to maintain the legitimacy of their political connections and protect them from disruption (Dorobantu et al., 2017). Thus, self-regulation can be used to preserve the status quo. By the same logic, self-regulation is also attractive to firms that are highly vulnerable to institutional pressures, whereas the intensity of the pressure influences the self-regulation form. In other words, low government pressure allows firms to take on a leadership role as they have more discretion in their actions. In contrast, high government pressure induces firms to interact cooperatively with environmental agencies (Child & Tsai, 2005).

Furthermore, a firm's self-regulation has a greater chance of altering the nonmarket environment in an institutional environment that facilitates transparency and information diffusion. Therefore, leveraging self-regulation works better in countries with strong civil society and media freedom. Indeed, such a strategy is more likely to succeed in contexts where signals about compliance with self-imposed rules are widely available and where structural arrangements exist to distinguish substantive efforts to act responsibly from symbolic actions (Wijen, 2014). In addition, when a firm adopts self-regulation intending to share value with its key stakeholders, the decision is mainly guided by the hope that such behaviour would be rewarded in the future (Hillman and Keim, 2001). The rule of reciprocity is based on a bet that the additional effort linked to self-regulation would be somehow compensated either by direct beneficiaries or by those who value responsible behaviour more generally. In pursuing such a strategy, a firm sends a one-sided signal with the expectation that, in the long term, other actors involved in repeated transactions with the focal firm will reciprocate (Dorobantu et al., 2017). Proactive nonmarket strategies are especially attractive in contexts where pressure from activist stakeholders increases the chance of stricter regulations. Self-regulation is thus preferred where firms face sustained grassroots opposition from influential stakeholders (activists, public interest groups, and local communities, among others) with urgent demands. However, suppose a political arena is fragmented (with many actors engaged in the issue settlement). In that case, a firm is less likely to participate due to potentially high costs (Voinea and Van Kranenburg, 2017).

Last but not least, self-regulation is also a proactive way to avoid the suppositious pressure or sanctions from stakeholders, while firms in the same industry share fate as

intangible common. An adverse campaign can tackle a competitor on a specific issue. Also, a company in the same sector can simply commit an error harmful for all the industry. If interpreted strategically, this situation constitutes an alert and impulse for implementation or communication on existing self-regulation to protect itself from future alleged burdens (Barnett and King, 2008).

The firm filter model, based on the behavioural theory of the firm, indicates that external political and industry environments are strongly mediated by the company's internal resources and structures to influence political activities (Rehbién and Schuler, 1999). Internal factors are closely linked to the firm's characteristics (size, governance mode and structure, origin, etc.), available resources and previous experience with engagement in nonmarket strategy. The likelihood of self-regulation is proportional to a firm's vulnerability to institutional pressure due to significant potential harm. Higher damage risk exposes the organisation to pressure from stakeholders, thus pushing it to engage in self-regulation preventively. Firms with recognised and strong nonmarket capabilities, as well as a past record (self-regulatory experience) in different domains, may prefer to pursue nonmarket activities independently and self-regulate individually despite collectively (Lux et al., 2011). To the extent that they are more credible to undertake socially responsible actions efficiently, they may also be in a better position to pursue self-regulation, thus further strengthening their position in the nonmarket arena. Nonetheless, suppose the company lacks the capabilities to acquire value from self-regulation to share with stakeholders (as the benefits from the provision of positive externalities or the abatement of negative externalities are not exclusive). In that case, it can be less inclined to follow this self-regulatory activity.

In summary, self-regulation may be driven by purely economic reasons or a mix of various market and nonmarket factors. Therefore, a more exhaustive analysis of elements presented above, categorised as issue related, external and internal, may explain the choice to mobilize voluntary corporate commitment as a nonmarket strategy.

1.2.3. Competitive advantage in and outside the market

This sub-section develops on the sources of competitive advantage and benefits in the nonmarket environment arising from organisational self-regulation.

Since many nonmarket issues arise from market activity, scholars recognise that the role of a nonmarket strategy is to enable and complement market strategy (Boddewyn, 2016). Following the value perspective, organizations principally engage in a nonmarket strategy to create or maintain corporate profits (Bonardi, Holburn, and Vanden Bergh, 2006). Consequently, competitive advantage can be built or lost outside the market, and nonmarket strategy may substitute for failing competitive strategies (Schuler, 1996). Political strategies offer broader access to superior sustainable performance than market ones due to direct positive effects with no reliance on competitive advantage (Koenig, 2015). Similar to the company's market strategy, nonmarket strategies serve the following purposes: to strengthen competitive advantage by seeking and creating business opportunities and to improve the firm's overall performance (Shaffer, Quasney, and Grimm, 2000). Thus, seeking a competitive advantage outside the market is essential for businesses. The table below sums up its potential sources.

Table 4. Sources of competitive advantage outside the market

Potential sources of nonmarket competitive advantage
- Adequate provision of information to decision-makers
- Enhancement/creation/protection of the firm's identity and reputation
- Access to new audiences
- Social legitimacy
- Autonomy with regard to other actors
- Limited uncertainty of the environment that the firm operates in

A firm retains a political competitive advantage over its rivals when able to provide decision-makers information more effectively - through easy (quicker and less costly) access. Also, the quality of information (understood as its credibility, rarity/singularity, and bargain power) remains determinant in nonmarket issue settlement. Moreover, self-regulation helps to protect, create, or enhance a firm's identity and reputation (Mena and Palazzo, 2012; Rindova,

Petkova, and Kotha, 2007). For instance, a company may gain a competitive advantage from positioning as a leader and distinguishing by exemplarity. Social positioning and social planning contribute to the firm's ability to create value (Husted and Allen, 2007). Also, it can be a manner to reach new audiences besides the usual stakeholders. When the political landscape changes, engaging in nonmarket activities with social-sector actors allows for building a non-governmental (social) legitimacy and limits the political risk (Sidki Darendeli and Hill, 2016). Consequently, self-regulation may be conducted to obtain autonomy with regard to (compared with) the other actors of the nonmarket environment (Springuel, 2011). In that sense, the influence understood as a capacity to decrease uncertainty or structure the system and interdependencies between actors (Crozier and Friedberg, 1977), is exercised to render the environment stable and predictable.

On top of economic benefits (lower operational, labour and capital costs, price premia, and access to public markets), a voluntary approach to regulation can provide a firm with additional advantages (Eisner, 2004; Whitford and Tucker, 2012). On the one hand, even though implementing self-regulation is seen by the companies as an additional cost to support, it does not necessarily impact the firm financial performance negatively (Watson et al., 2004). However, a meta-analysis linking corporate environmental strategies and financial performances established no significant difference between firms adopting proactive and reactive strategies regarding financial returns (Dixon-Fowler et al., 2013). This conclusion somehow undermines the argument of competitive advantage, expressed in financial terms, resulting from voluntary practice. Consequently, the corporate benefits from self-regulation shall be expressed in different terms.

Self-regulation brings various advantages in the nonmarket environment, specifically in the following domains: regulation and social licence (Darnall & Carmin, 2018; Heyes, 2005; Kawai, Strange, & Zucchella, 2018). The research in the field of the economy broadly supports this argument (Heyes, 2005; Maxwell & Decker, 2006; Gray & Shimshack, 2011). Nevertheless, the benefits yielded by self-regulation must be specific to the organization to achieve sustainable advantage (Tetrault Sirsly and Lamertz, 2008). An organization cannot hope to gain a competitive advantage if the benefits of its actions are dispersed among other firms in the field. Also, the undertaken efforts shall remain difficult to replicate by competitors. Otherwise, the advantage would not last long. Suppose self-regulation is pursued by the industry (in collective self-regulation) rather than by an individual company. In that case, it does not provide a competitive advantage against industry rivals (Baron, 1995a).

Benefits in the nonmarket environment resulting from self-regulation come from direct interactions between the firm and other political and social actors or indirectly. The table below presents the summarily.

Table 5. Benefits in the nonmarket environment resulting from self-regulation

Direct	Indirect
<ul style="list-style-type: none"> - Regulatory benefits: pre-emption of existing regulation, regulatory flexibility, and improved anticipation of future regulation - Easing regulatory and normative compliance - Regulatory endorsement - Social licence: reputation and legitimacy 	<ul style="list-style-type: none"> - Innovation - development of new competencies and capabilities - Risk management – accident prevention, lower uncertainty - Community welfare and local ecosystem development

As mentioned above, self-regulation brings direct specific regulatory benefits. These benefits of self-regulation occur in a trifold manner: pre-emption of existing regulation, regulatory flexibility, and improved anticipation of future law (Delmas and Terlaak, 2001; Heyes, 2005). Much of the literature on self-regulation argues that it can profitably pre-empt mandatory regulatory requirements (Backman, Verbeke, and Schulz, 2017; Delmas and Montes-Sancho, 2010; King and Lenox, 2000; Maxwell et al., 2000; Short and Toffel, 2010). However, those studies primarily focused on the industry level, and empirical evidence is demonstrated almost exclusively with US environmental programs.

Regulatory flexibility refers to simplified permitting processes or increased flexibility on the means to achieve the goals imposed by legislation. The legislator mainly defines the purpose of the regulation, the regulatory framework, and the sanctions for non-compliance. However, it does not contain specific provisions indicating how an economic entity should fulfil the purpose of a given regulation and leaves the broad sphere undefined. When facing expectations to adopt a standard, a prior implementation of self-regulation gives a company an advantage in fulfilling requirements to comply with the imposed standard and reducing the expenses of obtaining permits, licenses, and authorisations. Engaging in self-regulation allows firms to reach goals at their own pace and through tailor-made solutions. In addition, firms may benefit from the laxest control from the state agencies (Berrone et al., 2013; Maxwell and Decker, 2006). Successful self-regulation may be granted the implicit or at least perceived

regulatory endorsement and be advertised by the official public agencies (Delmas and Terlaak, 2001).

For firms, responsible behaviour is an essential source of reputation and legitimacy. Besides the simple satisfaction of external stakeholder expectations, communicating responsible behaviour to stakeholders helps to change the nature of social pressure (Delmas, Hoffmann, and Kuss, 2011; Vogel, 2010) through corporate image building. Corporation's positive image enhancing its reputation is a valuable asset but requires coordination between the company's vision, marketing communications, corporate strategy, organizational design and culture (Dowling, 1993). Social actors may deem firms to have greater legitimacy and provide them with preferential treatment and privileged access to resources. As noted by Buysse and Verbeke, public recognition is a significant advantage that firms can take from self-regulation. All stakeholder engagement activities (consultation, informing, participation) focus on increasing public awareness and acceptance of business operations (Buysse and Verbeke, 2003).

In addition, self-regulation allows the development of relations with new groups of stakeholders and raises a firm attractiveness to potential partners. When a competitor is under social pressure, leveraging self-regulation as a nonmarket strategy allows a firm to differentiate itself (Porter and Kramer, 2011) and thereby secure the future cooperation of key stakeholders (Odziemkowska, 2019). Responding to community concerns increases interpersonal trust, lowers transaction costs, and reduces uncertainty. Social impact theory provides the inverse evidence that failure to meet stakeholders' less explicit needs generates market fears, increases a company's risk and negatively affects the company's reputation (Salzmann, Ionescu-Somers, and Steger, 2005). Consequently, gaining a social licence may boost social trust, and the inverse - loss of a social licence may lead to loss of regulatory approvals and higher business costs (Baumber, Scerri, and Schweinsberg, 2019).

Finally, it is worth noting that indirect nonmarket benefits are brought by enhanced innovation resulting from the development of new competencies and capabilities, insurance against an adverse event (Godfrey, Merrill, and Hansen, 2010), and greater community welfare and local ecosystem development. While the firm's choice of nonmarket strategy is driven by its interests, such strategies may have broader social performance consequences. Even though some researchers contest this position (Karnani, 2011), effective self-regulation is likely to have positive societal outcomes.

Overall, successful treatment by firms of societal and environmental concerns is becoming a significant competitive advantage issue (Prakash & Potoski, 2006). In the nonmarket environment, self-regulation allows firms to anticipate and influence regulations, improve risk management and elevate corporate reputation. Sustainability is also a vector of organizational and institutional change (Reid and Toffel, 2009; Wittneben et al., 2012).

Closure and Transition

The first chapter presents an extensive vision of self-regulation in management scholarship. Self-regulation on the organizational level is defined as a regulation system in which an organization imposes commands and consequences upon itself independently from formal state intervention. The self-regulation phenomena studied by management scholars refer almost exclusively to voluntary environmental initiatives. While it has been recognized as a strategy to gain a competitive advantage, multiple advantages and drawbacks were pointed out in the literature. Also, self-regulation is criticised regarding its effectiveness, doubtful impact on overall firm performance and lack of democratic legitimacy.

Section 1.2. presents self-regulation as a component of the nonmarket strategy. Self-regulation favours a company to respond to threefold pressure: conform to institutional demands (regulatory pressure), ensure societal legitimacy (stakeholder pressure), and secure organizational performance (competitive pressure). This section outlines issue-related, external and internal factors that impact the probability of leveraging self-regulation as a nonmarket strategy. Next, the nonmarket benefits from self-regulation are exposed and several sources of firm competitive advantage outside the market are presented. Finally, establishing a link between self-regulation and possible changes in the nonmarket environment allows for determining self-regulation potential as a nonmarket strategy.

Management literature gives evidence of this strategic potential of self-regulation (Dorobantu et al., 2017). Few academic papers establish a direct link between firm self-regulation and nonmarket strategies, primarily in the context of private activism and a firm's response to social pressure (Baron, 2016; Calveras *et al.*, 2007; Lenox and Eesley, 2009). Baron notes that self-regulation is often labelled CSR (Baron, 2016). Nonetheless, the literature lacks comprehension of how self-regulation allows firms to influence legislatures, regulatory agencies, the media, social activists, *etc.*, thereby altering "the rules of the game" (formal and informal institutions). Thus, the research question is formulated as follows:

How does self-regulation operate as a particular nonmarket strategy?

The next chapter focuses on nonmarket strategy mechanisms to identify how self-regulation impacts the nonmarket environment.

CHAPTER 2. NONMARKET STRATEGY MECHANISMS

This chapter provides a concise analysis of self-regulation regarding its strategic potential in the nonmarket environment beyond the features mentioned in the previous chapter. Our theoretical framework is built upon the concept of mechanisms, as this research aims to understand how self-regulation is enacted in the nonmarket environment. The purpose is to explore what key actors and activities are likely to generate the impact and understand the mechanisms underlying the transformation.

Identifying the mechanism is helpful for both exploring and explaining the nonmarket implications of self-regulation. A major advantage of the mechanism-based approach is that it enunciates deeper, more direct, and fine-grained explanations. This chapter focuses on the nonmarket mechanisms activated by self-regulation by identifying its possible impact on the political and social environment. First, it outlines the interest in studying mechanisms as such. The next section provides examples of how researchers in the nonmarket strategy domain used this notion and pinpoint the lack of consistency in the literature. The last part develops on nonmarket mechanisms triggered by self-regulation that bring changes in the nonmarket environment.

The sub-parts of this chapter are as follows:

- Mechanisms in nonmarket strategy (2.1.),
- Mechanisms in the nonmarket strategy literature (2.2.),
- Strategic use of self-regulation in the nonmarket environment (2.3.).

2.1. Mechanistic perspective in science

The New Mechanism emerged in science's philosophy around the turn of the twenty-first century. It is based on a new approach which replaces thinking about science and scientific explanation in terms of laws and theories by thinking of them in terms of mechanisms and models (Glennan, 2017). Henceforth, a mechanistic explanation is recognized as an important and distinctive variety of scientific knowledge. The mechanisms remain an important objective of many sciences - predominantly life and cognitive science. Social science scholars, especially in economy and psychology, seek the explanatory power of mechanisms while opposing them to the general laws. An approach by mechanism remains more nuanced than covering law. Mechanisms present an advantage of providing probable explanations when generalizations are not possible. The covering law version describes the relationship between variables as "if $A_1, A_2, \dots A_n$ then B". A law asserts that under certain initial conditions, an event of a given type (the cause) will always produce an event of some other type (the effect). On the contrary, the mechanism version suggests interpretations "if $A_1, A_2, \dots A_n$ then sometimes B". Also, the interdisciplinary and cumulative character of knowledge generated by the mechanism-based approach (a mechanism built with specific components and frequently modified by other, subsequent mechanisms added to the earlier one) distinguishes it from the analytical variable-based one. Thus, the "idea of a mechanism is intermediate between laws and descriptions" (Elster, 1998: 45). Mobilizing the mechanism-based approach to study the nonmarket strategies provides new insights into the understanding of how a firm may impact its institutional environment.

2.1.1. Definition of mechanism and main characteristics

It is frequently the case that a mechanism can be identified through a recurring situation without having explicit knowledge about its starting conditions or outcomes in different circumstances. Two different understandings of mechanisms are specified in science that is (1) the concept of mechanism as an abstract form of interaction and (2) the concept of mechanism as a componential causal system. The former is associated with the strategy of abstraction and simple models, and the latter with the heuristic of functional decomposition and spatial localization (Kuorikoski, 2009). Mechanisms considered abstract forms of interactions are hypothetical concepts (which may be unobservable) that can explain a phenomenon given a specific context and characteristic process through which a particular result is achieved. Mechanisms as conceptual constructs are defined in the following way “frequently occurring and easily recognizable causal patterns that are triggered under generally unknown conditions or with indeterminate consequences” (Elster, 1998: 45). Along with the comprehension of mechanisms as conceptual constructs, one can define them in real terms as genuine causal sequences of action(s)-interaction(s) inducing change, specifically as a “constellation of entities and activities, typically actors and their actions, that are linked to one another in such a way that they regularly bring about the type of outcome” (Hedström, 2006: 75). Another comprehensive definition, in line with previous one states that “a mechanism (...) consists of entities and activities organized in such a way that they are responsible for the phenomenon” (Illari and Williamson, 2012: 120). The two abovementioned definitions highlight an essential feature of mechanisms: their composition of entities and activities.

The “entity-activity dualism” is recognized by New Mechanists and based on the assumption that mechanisms’ components belong to two distinct ontological categories: entities (conceived as material objects) and activities (the things that objects do or are engaged in) (Machamer, Darden, and Craver, 2000).

Table 6. Dual composition of mechanism – equivalence of terms used by different authors

Entities	Activities
Parts, component parts, objects	Interactions, component operations, occurrences

Nonetheless, while maintaining this dualistic approach, some scholars instead refer to terms of objects and occurments so “that mechanisms are composed of objects and of the states, events, or processes in which these objects are (engaged)” (Kaiser and Krickel, 2017: 752). Thus, a mechanism is a type of “systemic” concept (a particular system of interacting parts) that have two kinds of constituents bridging cause(s) and effect(s).

Another definition used by strategy and management researchers, yet borrowed from social sciences, describes a mechanism “as a systematic set of statements that provide a plausible account of how input and output are linked to one another” (Bromiley and Johnson, 2005). This definition presents the mechanism in a very descriptive manner, as a sequence of expressed ideas about the development of consecutive actions from a starting point to an end. Still, when considering only input-output-related mechanisms, other features are overlooked. Describing a phenomenon as a single input-output relation reduces the analysis's cognitive character. In reality, there can be multiple inputs and outputs from a mechanism, and the central features of a mechanism might be linked to details about how it unfolds over time (and not to its inputs or outputs) (Machamer et al., 2000).

The term “mechanism” sometimes equates to “trigger” or “force”. Yet, the “trigger” causes something to happen and indicates the element that sets a mechanism in motion rather than encompassing its complexity. On the other hand, “force” remains overly abstract, as scientifically, it refers to an influence that changes movement without focusing on functional details. According to the definition in management theory, a mechanism specifies social and economic forces causing organisations or individuals to adopt something (Kessler, 2013).

By the concern of differentiating between different concepts and approaches, I retained for further research the following systemic definition of the mechanism used in the philosophy of science and borrowed from Stuart Glennan (Glennan, 2005) :

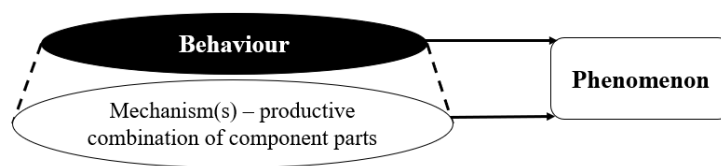
Definition of mechanism

A mechanism is a complex system, resulting in a phenomenon of interest, that produces a behaviour by interactions of a number of parts. Direct, invariant, change-relating generalizations characterise the interactions between parts.

2.1.2. From mechanisms to the phenomenon

For further comprehension of the adopted research approach, the ontological nature of mechanistic phenomena needs to be clarified. As the Stanford Encyclopedia of Philosophy⁶ suggests, identifying a mechanism requires an accurate distinction between behavioural and mechanical description. First, the mechanisms are represented by their decomposition, in the sense that the system's behaviour as a whole can be broken down into organized interactions among the entities and their actions. In short, a mechanism is composed of parts (entities and activities) that engage in action-reaction relations and can be seen as a productive system. Second, mechanisms underlie behaviour that is generated via the interactions. Finally, the phenomenon is the end state of a mechanism, understood as the results brought about by the mechanism that has occurred (Craver and Bechtel, 2007). These elements are schematically represented in the figure below.

Figure 4. Visual representation of relations between mechanism, behaviour, and phenomenon



Source: based on Stanford Encyclopedia of Philosophy, <https://plato.stanford.edu/entries/science-mechanisms/>, retrieved 9.8.2020

The black oval at the top of the figure represents the effect observed. It equals the behaviour of the mechanism as a whole. Beneath, one finds the mechanical description, including entities and their activities and interrelations. The dotted lines linking upper and lower ovals reflect the fact that the parts and activities are contained within (are components of) the mechanism engaged in this behaviour. Exploring which entities, activities, and organizational features contribute to the phenomenon and which do not allow defining the boundaries of a mechanism and linking it to the observed phenomenon.

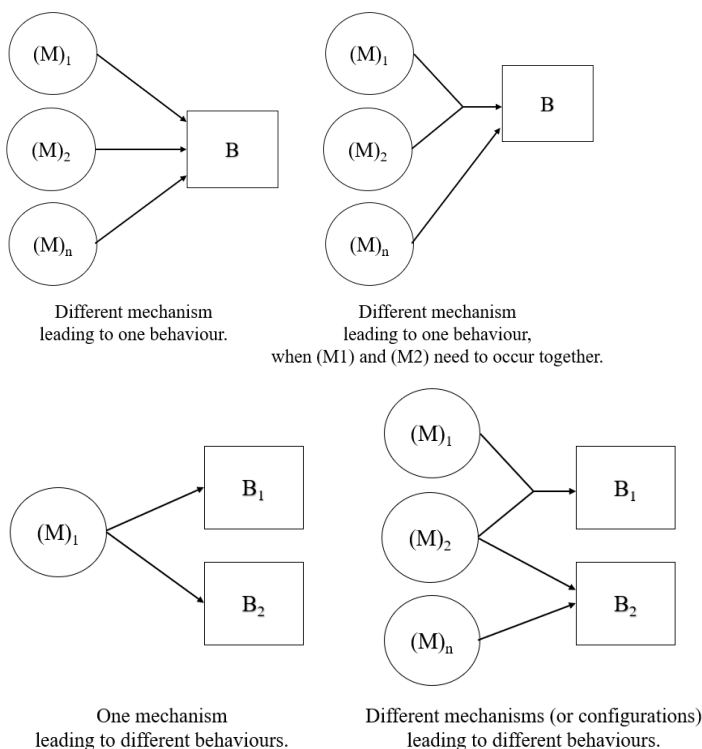
As mentioned above, the specificity of the mechanism is its dual characterization. This division between a mechanism's behavioural and mechanical description is analogous to the

⁶ <https://plato.stanford.edu/entries/science-mechanisms/>, retrieved 9.8.2020

division between *explanandum* and *explanans*⁷. The behavioural description clarifies the overall behaviour of the mechanism and answers “what a mechanism does”. It pertains to the external behaviour of mechanisms. The mechanical description tells one “how the mechanism does it”. It shows the productive combination of component parts (Pajunen, 2008) and their functional arrangement. This second approach describes relevant characteristics of the mechanisms in operation.

Mechanisms are argued to provide the answer to the problems of common causes and spurious correlations (Steel, 2004) and a way to consider the problem of sequence. Also, distinct types of mechanisms exist - those that maintain systems in stable states, others producing a periodic behaviour before a reversion, or accommodative ones that are activated only once or work irregularly (Bogen, 2005). As admitted in the literature, there is one–many relationships between behavioural and mechanical characteristics - behaviour can be produced by different mechanisms (Glennan, 2005). The schemes below present possible relations configurations between mechanism(s) and generated behaviour(s).

Figure 5. Configurations between mechanism(s) and generated behaviour(s)



⁷ Latin terms signifying: an explanandum is a sentence describing a phenomenon that is to be explained, and the explanans are the sentences adduced as explanations of that phenomenon.

Therefore, the mechanism-based approach allows consideration that different antecedents may lead a company to mobilise specific nonmarket activity. The same mechanism may be activated in response to different types of pressure on the firm. However, the same initial context may also lead to the activation of different mechanisms. Similarly, different mechanisms may be mobilised to reach the same outcome (functional equivalence), and contrarily one mechanism may result in one or more phenomena (Bechtel and Abrahamsen, 2005). It is also possible that specific conjunctions of multiple mechanisms are required to produce an adequate effect (Ylikoski, 2019). This can be explained under a multi-causal account. However, one could also think in terms of first and second-order mechanisms that emerge from the multiple interactions. As demonstrated by Pajunen in the study of organizational failure (Pajunen, 2008), the phenomenon under study can be brought by a series of mechanisms where the outcome of one mechanism is a starting point of the consecutive one.

After presenting the definition and characterisation of the mechanism-behaviour relation, the following sub-section briefly overviews the mechanism-phenomenon relation.

2.1.3. Mechanistic explanation

Mechanisms can be responsible for diverse phenomena: they carry out tasks (e.g. regulation and control), exhibit behaviours (e.g. growth) or uphold a system in stable condition (e.g. homeostasis). Thus, a mechanism can produce, underly or maintain the phenomenon. First, a mechanism is considered productive (causal) when a sequence of different entities/activities terminate in some end-product (object, state of affairs, other activity, or event). Second, a mechanism underlying a phenomenon provides action potential and ensures a capacity for generating a particular behaviour as a whole. Third, a maintaining mechanism fixes and keeps stable a state of affairs accounted for the phenomenon.

Two mechanistic explanations may apply to the same context - the constitutive one explaining the process (what happens at every step of the phenomenon) and the etiological one explaining the phenomenon as the end result. Both remain compatible, yet the crucial difference between the two is related to their causality. In the constitutive explanation, the mechanism and the phenomenon are related by a non-causal relation. In contrast, in the case of etiological mechanistic explanations, the mechanism as a whole causes the phenomenon (Kaiser and Krickel, 2017).

In general, three theses, based on the concerns on causation, explanation, and the relations among them, structure the scientific debate (Levy, 2013):

(1) “Causal mechanism view” considers that causal relations exist as the primary characteristic of the underlying mechanism. It focuses on etiological mechanistic explanations of a phenomenon by its preceding causes.

(2) “Explanatory mechanism view” underlines the necessity to specify parts and their organization/interrelations for further understanding of the phenomena (the explanatory relevance of composition parts). It focuses on constitutive mechanistic explanations of a phenomenon by its underlying mechanism.

(3) “Strategic mechanism view” considers the cognitive-epistemic power of mechanistic modelling.

In the nonmarket studies, different views are relevant, even though the causal mechanism view seems to be over-simplistic. The strategic mechanism view articulates a framework for representing and reasoning about a complex system. While outlining a strategy through this

approach, one relies on two methods, that is, (1) decomposition and (2) localization of mechanism (the breakdown of a system into parts and the assignment of distinctive causal roles to parts – according to the explanatory mechanism view) that help to build graphical models. Thus, explanatory mechanisms are linked to the ontic conception of explanation (constitutional and non-causal relation of components), whereas strategic mechanisms are linked to epistemic ones (Illari, 2013). The former focuses on reporting the relevant facts about entities and their activities, whereas the latter inquiries about how science represents and reasons regarding those facts (Levy, 2013). Explanatory and strategic mechanism views are mobilised in our reflection on the subject.

To summarise this section, a mechanism is conceived to be a complex system or process that reflect reality and is locally anchored (Illari and Williamson, 2011). It can be depicted as “a specific configuration of elements that is capable of producing a specific process (or behavior) in a specific context... [and] should be considered as recurrent patterns of the interaction of invariant change-producing elements” (Capano *et al.*, 2019: 4). A mechanism is composed of parts whose activities and interactions are responsible for producing a phenomenon of interest (constructive and causal dimensions of mechanism). However, identifying the component parts and their organization only partially explains the functioning of a mechanism. From the external perspective, the mechanism generating a phenomenon typically does so only in appropriate outward circumstances. Also, for many mechanisms, the relevant external circumstances are complex, and it is crucial to identify them and explore how their variations affect the behaviour of the mechanism. Then, their regularity allows for identifying patterns of behaviour. Often, such explorations reveal that the external circumstances are best understood as involving an organized system under transition through a second-order mechanism.

So far, in this chapter, I have focused on how a mechanism-based approach can be used in research to generate new knowledge. Following section overviews how the concept of mechanism has been applied in nonmarket strategy research.

2.2. Mechanisms in the nonmarket strategy literature

In parallel to market institutions, multiple exchange mechanisms underline actors' interactions in the nonmarket arenas. These exchange mechanisms refer to coercion, cooperation, moral commitment, and political influence behaviours that are intrinsic parts of nonmarket interactions and interventions between actors based on mutual interests, obligations, reputation and trust (Grandori, 1997). Thus, according to their attributes, the mechanisms can be roughly classified into (1) coercive or power-based mechanisms versus (2) cooperative and normative mechanisms characterised by the greater potential to resolve conflicts.

As long as legal and regulatory prescriptions are concerned in the nonmarket strategy literature, one finds many references to “control mechanisms”. A control mechanism is a process or technique for achieving a desired end state or outcome. It covers a wide range of intentionally designed institutional arrangements, for instance, regulatory and governance mechanisms⁸ (Boddewyn, 2003; Cafaggi and Janczuk, 2010). Consequently, public policy control mechanisms attempt to influence social processes, including the behaviour of economic and social actors. Also, social pressure, ostracism, and norms serve as control mechanisms over economic activity (Ahuja et al., 2018). In consonance with the abovementioned examples, self-regulation constitutes a control mechanism enforced on an organization itself.

The remaining part of this section is devoted to the presentation of how nonmarket strategy scholars mobilized the mechanism concept in various contexts. At least five different interpretations of mechanisms are present in the literature, that is : (1) a link between different nonmarket activities, (2) a link between a nonmarket activity and the efficiency of another activity, (3) link between nonmarket activity and firm performance, (4) nonmarket activity as defensive mechanisms against a nonmarket strategy of other actors, (5) nonmarket activity as mechanism shaping the external environment. The table below introduces different interpretations identified in the literature.

⁸ The governance mechanisms are often further specified under labels of cooperation or participatory mechanisms.

Table 7. Use of the term “mechanism” in nonmarket strategy research

Comprehension of the term “mechanism”	Example of mechanism as used in the literature	Object of the inquiry	Reference / Methodology
Link between corporate political activity and acquisition of nonmarket assets	Reputation-building mechanisms based on financial campaign contributions and the development of long-term relationships with legislators	Modern committee system of the US as a reputational-development device	(Kroszner and Stratmann, 2000) / Empirical - statistical analysis
Link between specific nonmarket activity and effectiveness of another nonmarket activity (<i>via</i> the acquisition of nonmarket assets)	Mechanism unfolds through the impact of corporate community programs on the development of the firm’s resources, which in turn improve the effectiveness of a nonmarket strategy	Relationship between corporate community programs and the effectiveness of corporate political activity	(Rehbien and Schuler, 2015) / Conceptual - Models of interrelations between different nonmarket activities
Link between specific nonmarket activity (information disclosure) and financial market outcomes	Mechanisms are channels of influence on firm performance: various external pressures and managerial information	Corporate-level environmental information disclosure impact on firm financial performance	(Lyon and Shimshack, 2015) / Empirical - event study
Nonmarket activities as defensive mechanisms against a nonmarket strategy of other actors	Campaign contributions and political ties as a counterbalancing mechanism to stakeholder opposition	Regulatory agency policy-making processes	(Fremeth, Holburn, and Vanden Bergh, 2016) / Empirical - statistical analysis
Nonmarket activities as mechanisms shaping the institutional environment	Mechanisms that link institutional envelope to firm strategic choices and the resources available for executing strategies	Institutions-firm strategy relationship	(Ahuja et al., 2018) / Conceptual

First of all, nonmarket scholars attempted to develop models of **mechanisms joining various nonmarket activities. The established link is the acquisition of specific nonmarket assets (development of resources and capabilities) that improves the effectiveness of corporate nonmarket strategies.** For instance, Kroszner and Stratmann (2000) identified a reputation-building mechanism by establishing the link between the financial contributions to political action committees and the development and maintenance of long-term relationships with legislators. Also, the inquiry on corporate community programs by Rehbien and Schuler (2015) allowed scholars to identify the three-step mechanism for improving the effectiveness of corporate political activity: (1) engagement in the community

program, (2) community program affecting the creation of a firm's resources (human capital, organizational capital, and physical capital resources), (3) utility of these firm-level resources for improving the effectiveness of a firm's nonmarket activity, in terms of issue awareness (breadth and depth of information) and interpersonal relations. This study suggests that within an organization exist mechanisms linking its strategic choices (regarding deployment of alternative nonmarket activities) moderated by the development of firm capacities.

The concept was also used to describe a link between a specific nonmarket activity and firm performance. For instance, Lyon and Shimshack (2015) distinguish several **mechanisms considered channels of influence (mainly various forms of external pressure)** by examining factors that impact environmental information disclosure and how it is potentially linked to financial performance. According to the authors, the nonmarket mechanisms refer respectively to activist and regulator pressure, thus equating to sources of external burden. **Of particular interest is that they overtly admit being “unable to definitively determine the mechanism(s) linking [our] information event and subsequent (...) outcomes” (Ibid., 643) and only suggest further research pathways to figure out how to precise the concept of nonmarket mechanisms.**

This **mechanism's feature bundled with external pressure** was also inquired in another research. Fremeth and colleagues studied how firms strategically manage opposition from organized stakeholders. They analysed the interplay between firms under social pressure in the regulatory agency process but not overtly contested by NGOs. They demonstrated that firms respond to contested regulatory environments by cultivating support from elected political institutions that oversee the regulators (Fremeth et al., 2016). Considering interactions in the nonmarket arena, if actors with conflicting objectives engage in nonmarket activities, specific behaviour can protect against and buffer from actions undertaken by other actors. This buffering mechanism allows a firm to act upon its boundary spanning, by mediating its positioning toward the external environment (Mellahi *et al.*, 2016).

The institutions-based strategy model refers to **the mechanism as links between the institutional environment and firm strategic choices**, which are bidirectional. All the strategies (market or nonmarket) are tailored to conform to the institutional envelope, defined as “the assemblage of formal and informal bodies that govern, facilitate and constrain organizational action and the practices, and the norms and regulations supported by such bodies, to accomplish the achievement of their goals” (Ahuja et al., 2018: iii), or shape the

institutional envelope in turn. **The institutional envelope influences firm strategy through two mechanisms: (1) determination of strategic space (set of factors or variables that a firm can strategize about), and (2) determination of resources available for executing the potential strategies (Ahuja et al., 2018: iv). A firm can attempt to influence existing institutions or create new ones through both formal (industry-self regulation) and informal (networks) mechanisms.** From this point of view, specific nonmarket activities are considered mechanisms that affect the institutional environment. **Self-regulation, as an element of private policy, is considered a private governance mechanism and consists of executing self-control. It is also considered as a mechanism for solving information problems between firm and its stakeholders (Potoski, 2017).**

Nonetheless, according to the concept of “mechanism” as exposed in the previous section, it is hard to consider any nonmarket activity as a mechanism itself. Even though scholars refer explicitly to the notion of mechanism, its usage remains inconsistent and often inaccurate. Consequently, using the term “mechanism” in different manners creates confusion and impedes dialogue between researchers using a single word to describe different phenomena.

To concretize the idea of nonmarket mechanisms underlying the interactions between economic, social, and political actors, the following section presents the specific mechanisms triggered by self-regulation. At this point, the nonmarket mechanisms related to self-regulation identified in the literature are briefly described due to their limited presentation by the other authors.

2.3. Strategic use of self-regulation in the nonmarket context

This section reviews the literature to capture how self-regulation impacts the nonmarket environment and how authors explain its functioning. Considering that researchers use the term "mechanism" inconsistently, the review is focused on firm self-regulation (entity + action) as it remains the compulsory component of investigated situations. Self-regulation is considered here a corporate activity in response to which other actors adapt their behaviour. Consequently, it provokes changes in the status quo.

Mobilisation of self-regulation in the nonmarket environment can take various forms. Strategic management studies consider a purposeful use of self-regulation to pre-empt regulation. However, only a few papers investigate in detail how it operates and what is its precise impact on the business, social and political context. Two main aspects on which self-regulation can act are informational asymmetry and external pressure.

The informational asymmetry exists as such between actors in the nonmarket environment. Firm self-regulation results in the internal level of information being, by default, superior to the information available to others. Consequently, the action of modifying information asymmetry is initiated by the firm. Communicational self-regulation (information disclosure, corporate transparency) aims explicitly at information sharing and providing other actors with credible data. Along with established, periodic information diffusion procedures, communication campaigns on self-regulation can also be organised *ad hoc*. The type of information moving issue in the nonmarket arenas has to be adapted to the audience and the argument constructed accordingly. Consequently, the type of information and channels of influence differ significantly.

The external pressure can be directed towards the company (regulatory and normative pressure) or exercised indirectly (pressure exerted by activists on political decision-makers). Overall, the demonstration of a company's self-regulation is intended to satisfy the opponents, to weaken their position and the associated burdens. Mobilising it does not necessarily make external (social and political) pressure disappear completely, but dynamic forces alter the relations between the firm, opponents, and public authorities.

The table below summarises how self-regulation can be mobilised in the nonmarket environment.

Table 8. Impact of self-regulation regarding the nonmarket environment

Leveraging self-regulation to...	Unfolding	Output	Reference / Methodology
Modifying a nonmarket issue perception	Credible information diffused among reliable informants triggers informational and reputational cascades	Self-regulation prevents the occurrence of a widely salient issue	Bonardi and Keim, 2005 / conceptual – theoretical model
	Deliberate communicative actions conducted toward various actors modify their interpretation of the issue	Self-regulation allows re-framing a salient issue	Bach and Blake, 2016 / empirical – case studies
Weakening adverse lobbying	Information diffusion limits the flow and quality of information transferred from other interest groups to policy decision-makers	Self-regulation reduces the informativeness of lobbying and raises opponents' costs	Lyon and Maxwell, 2004 / conceptual
Setting the political agenda	The development of specific capabilities allows the implementation of a pragmatic, progressive policy strategy	Self-regulation pulls new legislation	Fremeth and Richter, 2011a / empirical - case studies to analyse four successful and failed nonmarket strategies
Impacting the implementation	Voluntary commitment to new levels of performance that only modestly exceed current practice weakens forthcoming regulation	If failing to pre-empt the regulation, self-regulation softens the impact of new laws	Lyon and Maxwell, 1999 / conceptual
	Consecutive reinterpretations of the legislation occur in the regulatory flexibility context	Self-regulation leads to a functional interpretation of an incomplete law	Funk and Hirschman, 2017 / empirical – case studies

The elements presented in the table allow concluding that the nonmarket mechanisms based on self-regulation are not functionally equivalent and generated multiple outcomes. They are further discussed in the following sections.

2.3.1. Mobilising self-regulation to act upon issue perception

The issue perception conditions nonmarket actors' positioning regarding the issue's importance. Consequently, issue perception impacts the extent to which an actor feels concerned and ready to act upon it in the nonmarket environment. Also, it conditions how an entity interacts with other actors. The concept applies to different nonmarket actors - it can designate attention being paid to the issue by the public, the media, policymakers, etc. In general, the characteristic of a recipient significantly influences their perception. However, it can also be shaped by the actions of other actors according to two features - saliency and framing.

Issue saliency, understood as the extent to which people cognitively and behaviourally engage with a nonmarket issue, is characterised by two dimensions: awareness and importance (Whitehead, 2017). When considering the degree of issue saliency, one distinguishes between widely and narrowly salient issues. The former is to be of interest to a large segment of likely voters and to receive considerable media attention. The latter is of limited public interest, often advocated only by organised groups and resolved without public discourse.

Depending on the level of issue saliency, self-regulation can be mobilised in two manners. It can help a company manage how particular issues enter the public consciousness – getting attention or avoiding attracting it (Heyes, Lyon, and Martin, 2018). Firstly, self-regulation is relevant to keep the issue saliency low early in its settlement by acting upon the information cascades⁹. It prevents the occurrence of a widely salient issue and its uptake by political decision-makers (Bonardi and Keim, 2005). In such a case, a firm becomes active in the nonmarket arena regarding a rising issue that has already been self-regulated without communicating. However, the information diffusion goes through the intermediaries - experts and high-status individuals – who provide other nonmarket actors with trustworthy information of high quality. The orchestrating behaviour is based on constituency building among credible informers, thus influencing the information content and providers. The

⁹⁹ According to Bikhchandani et colleagues “An informational cascade occurs when it is optimal for an individual, having observed the actions of those ahead of him, to follow the behaviour of the preceding individual without regard to his own information” (Bikhchandani, Hirshleifer, and Welch, 1992: 994). In nonmarket strategy, the informational cascades have a direct impact on issue saliency, as it may become widely salient because rationally ignorant voters imitate the behaviour of others who decide that an issue is threatening or important.

concomitant outcomes are apparent in the form of an upgraded reputation of experts and reporters and information cascade on the issue blocked out.

Secondly, self-regulation can be mobilised to frame the issue. Issue framing “consists of deliberate communicative actions intended to foster the development and maintenance of widely held ideas and interpretations of issues” (Bach and Blake, 2016: 71). Consequently, it impacts multiple features regarding issue settlement: the type of actors who care about a nonmarket issue (engaging with new audiences or buffering from specific actors), how those actors perceive their interests (the importance and willingness to act upon), the political setting in which the issue plays out (arena), and the information and assets that can shape how the issue is resolved. Issue framing can move collective opinion or even stop the information cascade, possibly making public policy intervention needless. When an issue already attracts public attention (what potentially obliges policy decision-makers to stop neglecting and picking it up for the settlement in a political arena), a company may release new information in the media. Consequently, as an issue develops, new forums for analysis open. For instance, an energy sobriety policy can be framed as a solution to maintain consumers’ purchasing power or a risk of increasing energy poverty. Presenting the facts surrounding an issue in a specific manner is intended to diminish its importance or create the appearance of a problem at hand while suggesting the most appropriate solution compared to the opposition. Considered a powerful tool to shape the structure of a firm’s nonmarket environment, it is also recognised as a tool to rethink nonmarket constraints in terms of opportunities for strategic organisational action and transformation (Ocasio and Radoynovska, 2016).

2.3.2. Mobilising self-regulation to weaken adverse lobbying

Self-regulation may be useful in the phase of a political bargain on the nonmarket issue to impact the opponents' lobbying. In such a setting, the entities engaged in the political negotiations over an issue are firm, adverse groups and policy decision-makers (legislator or regulator). A direct relation between a firm and an interest group is observed, whereas a policymaker can be passively present in the setting (as an information receiver). Also, self-regulation can be activated toward stakeholders when a firm has no direct access to political decision-makers (impossibility to lobby directly). When self-regulation is activated as a strategic action to counterbalance adverse lobbying, a firm may use it to (1) modify other actors' incentives for lobbying (Lyon and Maxwell, 2004) and (2) impact the informational asymmetry (King, Lenox, and Terlaak, 2005).

First, if self-regulation satisfies adverse demands, it lowers the possibility of opponents' campaigns against the firm. Consequently, an adverse group would be more inclined to target those companies which have not voluntarily committed to the issue. Also, a firm can prevent opponents from lobbying by significantly raising their costs (access to decision-makers, information acquisition and diffusion) through self-regulation. Thus, self-regulation may induce opponents' decision that the further gains from political action against the firm are insufficient to justify the costs and make them renounce further participation in the political process (Lyon and Maxwell, 2004).

The informational asymmetry exists between different actors. As long as the interplay between nonmarket actors is considered, the aim of demonstrating firm self-regulation is to reduce the flow of information from opponents to decision-makers (Lyon and Maxwell, 2004). The capacity of information absorption and analysis by political decision-makers is limited. Thus, by pushing its own arguments, a firm automatically diminishes the possibility of opponents bargaining on the issue. Overall, communicating self-regulation towards policy decision-makers reduces the informativeness of adverse groups lobbying. The reduced flow of information plays the role of the firm's insurance against adverse policy outcomes, as "it reduces the severity of the worst-case scenario" (Ibid., 590) if legislation is passed.

The informational asymmetry between market actors can also be mitigated through self-regulation and consequently impact the nonmarket environment. Under regulatory threat, by lowering the high information costs for consumers and interest groups by imposing stricter

prescriptions on firms, self-regulation sends an informational signal to consumers and stakeholders. Firm benefits from having a first-mover position and uses this position to induce lower qualities by committing to a level inferior to the one that would emerge if the regulator imposed its directive (Lyon and Maxwell, 1999). By reducing asymmetries to the level that satisfies all parties, including the regulator, the firm obtains the outcome of forestalling future legislation by committing to lower-level voluntary prescriptions.

The results of self-regulation strategic mobilisation depend on the level of commitment, as it needs to be characterised by “just enough stringency to placate” stakeholders (Ibid., 192). Another critical factor is the informativeness of the firm’s lobbying campaign, that is, the flow and quality of information that moves an issue over the arena. Further, the impact of self-regulation on opponents’ incentives to lobby depends on adverse interest groups’ political activity cost/benefits analysis.

Regarding regulatory effects, mobilising self-regulation does not allow for predicting an exact result of the political bargain but allows for eliminating an adverse group from the nonmarket arena. However, it seems that mobilising self-regulation to weaken adverse lobbying is more efficient when the number of interest groups in the arena rises. Thus, it can be concluded that the optimal circumstances for activating self-regulation to impact adverse lobbying are not well defined.

2.3.3. Mobilising self-regulation to influence political agenda

Self-regulation can be directly mobilised in the political arena to influence policy agenda-setting. Curiously, doing it can not only forestall but also accelerate and direct the implementation of public policies. Researchers claim that "if firms are serious about solving social issues, they will need to combine their voluntary, discretionary efforts with lobbying for (hard) legislation that can establish minimum standards on pressing social challenges" (Rehbein *et al.*, 2020: 207). Indeed, the trend for seeking hard law by companies instead of simple self-regulation is already observed (Curran and Eckhardt, 2020: 629). In such a case, a firm's impact on future regulation is even more substantial.

It is demonstrated that self-regulation occurs under a strategic rationale for responding to extra-jurisdictional regulation (e.g., from a different state). When subjected to indirect social pressure¹⁰, a company may be willing to implement voluntary practices to conform to higher standards already in force in other countries (Fremeth and Richter, 2011a). It may forestall the local regulation regarding the issue while bringing satisfaction to the social claim. A similar phenomenon called "norm cascade" is found in many contexts, whereby a norm diffuses across international borders, becomes taken for granted, and influences the activities of individuals and organisations worldwide (Marquis *et al.*, 2016).

Self-regulation remains a strategic tool to develop new competencies and capabilities that a firm capitalises on in the nonmarket environment. Such self-regulation ensures that progress in terms of corporate commitment is in line with the internal strategy and planning and is not exposed to external pressures. In addition, it may foster legislative prescription and shape future policy around the company's existing capabilities and strengths, as shown in the case of Hewlett-Packard and its electronic waste recycling initiatives (Fremeth and Richter, 2011a). While demonstrating its ability and desire to meet higher standards that serve the public interest, a firm positions itself as an active player in the political arena and proves its leadership potential on the nonmarket issue. In such a case, low-cost firms (e.g. in terms of environmental footprint abatement) may use self-regulation to signal that the cost of regulation to the whole industry is low and thereby induce high-standards regulation to its competitors (Denicolò, 2008). On the contrary, through strategic positioning and mobilisation

¹⁰ In this specific case an indirect social pressure takes the form of activists pressure policymakers to implement new regulations inspired by the benchmark among different countries or sectors.

of self-regulation referring to high-quality standards, a firm can ensure that the regulator does not exceed a specific average quality limit in setting new standards (Lyon and Maxwell, 1999).

Overall, a company leverages self-regulation with a possible double strategic intent. Purposeful self-regulation (demonstration of operating under high standards) fosters progressive policy change if a firm does not benefit from the status quo. On the contrary, it delays regulatory reform or flips its likely direction if the company is interested in ensuring that the new regulation does not change the current context.

2.3.4. Mobilising self-regulation to influence policy interpretation

Once legislation is voted on, while the government subsequently sets the regulations, the voluntary actions of firms may influence executive acts. Thus, self-regulation is a business practice that possibly alters legislative intentions and influences policy interpretation. When policies leave space for interpretive flexibility, operational self-regulation may lead to implementation-driven change as firms develop functional interpretations of legislation. Granting interpretational freedom to economic actors allows companies to benefit from legislation shortcomings and mediate its impact on society. It occurs when a “state creates broad rules about corporate behaviour and firms experiment to find practical strategies that are normatively acceptable” (Dobbin *et al.*, 1993: 397).

Self-regulation softens new laws' impact by inducing regulators to set relatively weak standards. When the legislation is passed, yet not fully specified, companies may benefit from the difference between prescription on means or results¹¹. Before the setting of new standards by the executive body, a firm commits to new levels of performance that only modestly exceed current practice before the regulator promulgates a standard (Lyon and Maxwell, 1999). Consequently, self-regulation weakens forthcoming regulations.

Indeed, the procedures and structures adopted by the firms become taken-for-granted methods of compliance. Thus, organisational practices, routines, and structures influence legal thinking, categories, and compliance logic (Edelman and Talesh, 2001). Operational self-regulation, considered market action, can be purposefully used to effect policy change. Scholars demonstrate that the practical policy interpretation by a company may subsequently, via feedback loops, shape how other stakeholders (including regulators, judges, and other authorities) understand the law and consequently alter its real effects more broadly (Funk and Hirschman, 2017). Exercising policy influence via self-regulation may be purposeful and intentional. Such corporate norm-entrepreneurship can take the form of norm-setting (diffusion of the new practice) as well as norm development (further specifying a norm's implied requirements) (Flohr *et al.*, 2010). The result of such self-regulation mobilisation is a distortion of legislative effect.

¹¹ It draws upon the distinction between obligation of means (implemented practices) and obligation of results (performance).

To summarise, perceived as an operational practice aimed at optimising a firm's performance, self-regulation may be reinterpreted as a nonmarket strategy. Also, the intentional use of self-regulation in the nonmarket context can generate multiple results regarding the nonmarket issue perception, the political activities of other actors and last but not least regulatory outcomes.

Closure and Transition

Chapter 2 outlines the nonmarket strategy mechanisms. Mechanisms are a distinctive category of scientific knowledge, that allows for understanding the phenomenon which is not underlined by the general law. They provide indications and explanations that are intermediary between laws and simple descriptions, as they are based on frequently occurring and recognizable patterns of behaviour. The explanatory mechanisms focus on reporting the relevant facts about entities and their activities, whereas the strategic mechanisms inquire about how science represents and reasons about those facts. The nonmarket mechanisms underlie the relations between actors in the nonmarket environment. In general, they are divided into coercive or power-based mechanisms, on the one hand, and cooperative and normative mechanisms, on the other. They can be also classified as mediating (regarding nonmarket strategy implementation) or moderating (regarding the impact on nonmarket change).

Our theoretical inquiry concludes that self-regulation remains linked to multiple mechanisms operating in a nonmarket environment. Nonmarket mechanisms based on self-regulation are not functionally equivalent, in terms of generated behaviour, as well as effects. They are characterised by some common features regarding set-up conditions and unfolding. Mechanisms allow companies to enter into relations with various external stakeholders like communities, NGOs and other activists, public authorities, *etc.* It also appears that self-regulation is closely related to some other nonmarket activities.

In order to understand **“How does self-regulation operate as a particular nonmarket strategy?”**, this research answers the following questions: **What are the mechanisms through which self-regulation operates as a nonmarket activity? Do some of these mechanisms intertwine with one another?**

The empirical investigation of specific self-regulatory initiatives, as conducted in this research, sheds light on self-regulation as a nonmarket strategy phenomenon and the theoretical elements previously exposed. The next chapter commences the second, empirical part of the dissertation and exposes methodological elements, including the empirical setting and cases while discussing the implications of the chosen research design.

PART 2 – METHODOLOGICAL ELEMENTS

CHAPTER 3. RESEARCH DESIGN

The first part of the dissertation outlined the conceptual framework of the study constructed to further investigate mechanisms based on self-regulation that alter the nonmarket environment. The objective of this chapter is to outline the adopted research design in line with the research questions: **What are the mechanisms through which self-regulation operates as a nonmarket activity? Do some of these mechanisms intertwine with one another?** It is complemented by contextual elements, including the overview of the regulatory framework. Also, the chapter provides a description of the empirical setting - the sector of interest, companies and sampling for cases.

The key elements of this chapter are as follows:

- Synopsis of research design (3.1.),
- Presentation of the empirical setting (3.2.),
- Overview of selected cases (3.3.).

3.1. Research design

The primary motivation to study nonmarket strategy mechanisms is to go beyond simple descriptive study where the generation of the covering law is inappropriate (due to pervasive contextual elements). This section expounds on the theoretical underpinnings of the methods selected for creating new knowledge in this research. First, the genesis and overview of the research project are provided. Then, the qualitative positivist paradigm and its ontological, epistemological, and methodological assumptions are outlined. The research method understood as a strategy of enquiry, which moves from the underlying assumptions to research design and data collection and analysis, is presented further in this chapter.

3.1.1. Genesis of the research project and overview of its evolution

To enhance the clarity of their work, researchers usually introduce it in a structured way. Indeed, the definite version of the thesis is presented that way, but in fact, the final layout is not necessarily evident from the beginning. Nonetheless, research often results from a long process of going back and forth between the literature, the field, the subsequent analysis and the researcher's reasoning, discussions with peers, *etc.* To ensure transparency, I outline this doctoral thesis's evolution. This sub-section also presents the potential biases I had to manage during the process resulting from my previous affiliation with a consultancy company and linguistic dilemmas.

Progression of doctoral thesis

The thesis topic arose from a collaborative project with a strategic sustainability consultancy company, where I worked on energy efficiency issues. The managerial interest in studying the strategic potential of self-regulation combined with the gaps identified in the literature on nonmarket strategy led to research problematisation. After several readings and discussions with peer academics, it appeared that nonmarket strategy research was missing the reflection on firms voluntarily constraining their behaviours to reinforce their nonmarket position. At that stage, the topic was centred on the self-regulation process and its outcomes in the nonmarket environment. My participation in the European Academy of Management (EURAM) conference in 2019 confirmed the interest in my research from an academic point

of view. It directed my attention to the nonmarket mechanisms triggered by self-regulation. At this stage, I have already gathered data on energy efficiency and waste management practices of different companies in the food retail sector in France and conducted a set of exploratory interviews.

In September 2019, the CIFRE fellowship was interrupted halfway by the company. The unexpected situation has put the continuation of my doctoral studies into question. The difficulties that I had to face and problems to solve were multiple. First, I had no financial resources to continue the research project. The second issue, which had probably the most significant impact on project viability at that time, was the loss of access to internal data provided by the company and access to potential sources of information. Third, and as a consequence, the research project has been wholly revisited in terms of its methodology and schedule to make it feasible and to be able to complete it within a given frame of time. I decided to reduce the number of cases and adjust the scope of the study. Also, an entirely new approach to data treatment was considered to exploit information that remained in my possession.

However, 2020 brought its share of inconveniences as the Covid-19 pandemic has hugely impacted the companies included in my sample. The food retail sector has been particularly overwhelmed with the management of immediate operational issues, for instance, supply or employees' and client's security. Therefore, access to primary data proved particularly difficult and took much longer than expected. Ultimately, the research project, as presented in this thesis, had undergone multiple modifications and adjustments.

Researcher's relationship with the field

To understand the emergence of the problem and the approach behind this PhD research, it is essential to underline the researcher's personal interest in this topic and relationship with the field. My interest in the topic of corporate environmental practices is directly linked to my professional experience in environmental services companies operating in France and other EU countries. From 2013 for over six years, I worked in the energy efficiency sector. I witnessed the evolution of private firms' approach and adaptation to the consecutive regulatory prescription in terms of energy sobriety. I worked with several industrial companies and firms in the retail sector. Also, more recently, the issue of circular economy has gained significant attention, and at some point in my operational work, energy management has become linked to waste management issues. This turned out to be profitable

when I was obliged to abandon the empirical research scope on energy efficiency and decided to use the business environmental practices regarding waste prevention and management as a research setting.

During the empirical part of my research, I realised that the affiliation to a consultancy company and multiple contacts in a professional circle represents a double-edged sword. A well-developed professional network can be perceived as a considerable advantage, making it easier to get in touch with potential interlocutors. However, while it seemed negligible for some contact people, I was often refused the right to obtain a testimonial. Also, some of those who agreed to talk to me did not wish to mention specific issues in our conversation. Thus several of my questions during interviews remained unanswered.

Secondly, being considered by others as a professional who conducts academic research required the highest integrity, a strong work ethic and scientific objectivity. Several times, I was confronted with a situation where the person I spoke to expected me to pass on information or opinions about competing companies. In a sense, the fact that I became a researcher independent from any business allowed me to have a different relationship with the field.

Last but not least, a linguistic challenge arises from the conducted research. My native language is Polish. In addition, I am fluent in French and English. I decided to conduct research and write the dissertation in English for a few reasons. First, the nonmarket strategy research field is largely dominated by English-speaking researchers and is significantly less well-developed in France. As a consequence, working in English facilitates scientific dialogue with pairs. Also, I feel more comfortable writing in English as it is my second language that I have practised for much longer than French. However, studying at a French university and choosing the cases on French companies made me work daily in French. To put it schematically, the theoretical framework is constructed on English language bases, so scientific reflection is done primarily in English. On the other hand, all data processed were in French and exchanges with colleagues within my research unit were primarily done in French. Thus, I was constantly confronted with the necessity of translation and the requirement of its precision and quality. Finally, the Polish language was almost inexistent in my research until I started the redaction of the final version of my dissertation. Not surprisingly, I often drew upon my mother tongue to use the most explicit formulations of my ideas. I believe I have successfully completed the challenge of research work in a multi-lingual context.

This introductory sub-section allowed me to explain the evolution of the doctoral project and how my own experience and position influenced the conducted research. Further, the core elements of the research design are presented, and their relevance is argued.

3.1.2. Overview of the research program

One of the conditions for conducting a rigorous and successful qualitative case study is to clearly state the assumptions, the direction of the research and, most importantly, its purpose. These elements are necessary to build subsequent analysis. Consequently, this section briefly develops each aspect to clarify the research program. The details of chosen research design are provided in the following sections.

My fundamental assumption was that nowadays, firms commonly put in place internal policies. The resulting practices – organizational, operational and communicational – are, at least partially, voluntary. These practices may become a strategic response to institutional pressures (regulatory and/or social) and also shape the firm's external environment to its advantage. That is why the nonmarket strategy approach is relevant to studying the phenomenon of self-regulation by addressing the question: how does self-regulation operate as a particular nonmarket strategy?

In practice, my purpose was to identify a company's self-regulatory initiatives and analyse their potential impact on the nonmarket environment through the activated nonmarket mechanisms. To achieve the objectives of this research, the method of an exploratory cumulative case study based on qualitative methods was employed. The table below gives an overview of the research design key elements.

Table 9. Summary of the research protocol

Research element	Design
Research question	How does self-regulation operate as a nonmarket strategy?
Theoretical framework	Nonmarket mechanisms
Epistemological and ontological paradigm	Positivist
Study design	Exploratory
Research strategy	Cumulative case study
Research method	Qualitative longitudinal
Timeline	2009 - 2019
Sample size	Ten cases
Empirical setting	French food retailers – one integrated and one franchised group
Access to organizations and respondents	Requires permission of individuals Requires approval of organizational officials
Degree of control	No control over the social system being studied
Units of analysis	Self-regulation projects
Type of self-regulation project observed	Corporate voluntary environmental initiatives regarding waste prevention and management practices
Data source	Original data collected Primary and secondary data collected
Subject	Self-regulation in terms of waste management
Research techniques of inquiry	Semi-structured interviews (individuals) Documentation analysis (corporate reports, press articles, grey literature) Press content analysis through Topic Modeling

The research program is based on an instrumental case of French food retailers' voluntary initiatives to understand a phenomenon of self-regulation that goes beyond the operational practice itself. Thus, a dominant exploratory approach, use of qualitative design, together with triangulation of data and perspectives across the industry, seem to be an appropriate research design framework.

Social knowledge generated in the nonmarket domain is inherently context bounded. Thus, the case study is analysed as a bounded system with its external context. A specific set

of criteria was established to sample the cases. A self-regulation project is a unit of analysis. Data are collected on a unit of observation, that is, corporate voluntary environmental initiatives regarding waste management.

Moreover, as long as the temporal dimension is concerned, the study traces companies' initiatives undertaken between 2009 and 2019, with few exceptions, if relevant. These dates are chosen according to the legislative framework in force, as 2009 was marked by new political guidelines and structuring legislation resulting from the national environmental conference held in 2007. 2019 is when the latest legislation on the circular economy has been negotiated with stakeholders, as it was issued in early 2020. The period of over ten years allows following the evolution of regulatory approach and legislation used as a benchmark of actors' self-regulation activities. To delineate the unit of observation, its starting point is set at the moment when the issue covered by self-regulation becomes internally "apparent", which means the company starts considering it as such. This starting point can occur before or after a regulatory attempt on the issue.

I had no control over the context of the study, the policies in place and the production of information shared within the study. The individuals' permission granted in advance conditioned access to organizations and respondents. I collected original primary data and also mobilized numerous secondary data. The process is presented in detail in section 4.1.

3.1.3. Choice of positivist epistemology

“Qualitative positivism” has been chosen as the guiding paradigm. This research adopts qualitative methods and methodologies based on positivistic ontological and epistemological assumptions (Piekkari and Welch, 2018) regarding comprehensible reality driven by immutable natural mechanisms (Guba and Lincoln, 1994). This specific epistemological approach to the political strategies of organisations is also qualified as “adjusted positivism” (in French *positivisme aménagé*) characterised by the highly contextual nature of the modes of action and the unobservability of some elements of the research programme (Rival and Chanut, 2015).

Fundamental philosophical differences in worldviews have a direct impact on the research design. Consistent and integrated ontological, epistemological, theoretical, and methodological positions are required for coherent research designs. Ontology, as a branch of philosophy, refers to the nature of reality. Thus, ontological questions interrogate fundamental ideas about what is real. Epistemology (theory of cognition or gnoseology) deals with the relationship between cognition, knowledge and reality. Epistemological discussions interrogate how we know the world, by whom, and what can be known. Theoretical perspectives provide the logic and the criteria that organize the overall research strategy, that is, methodology and methods.

Epistemology concerns the nature of knowledge, which drives the research's theoretical perspective and later determines the selection of the methodology or approach. Positivism, adopted in this study, is one of the main epistemological approaches used in mainstream management research as an alternative to constructivism. It posits that the “reality is assumed to be concrete, separate from the researcher, and cognisable through the use of so-called objective methods of data collection” (Prasad and Prasad, 2002, 6). The positivist paradigm emphasizes that genuine phenomena based on factual occurrences could be studied and observed scientifically and empirically, and the phenomenon could be elucidated by way of rational investigation and analysis. Further in this subsection, the epistemological reflection on the research design is exposed.

Indeed, the critical question raised by mechanistic scholars is: Are mechanisms “in the world,” or are they a feature of our current state of knowledge? Thus, one fundamental disagreement concerns the ontological status of mechanisms. There are two competing ways

to approach this issue. For instance, Elster places the mechanism within our knowledge system rather than in the world (Elster, 1998). Following this approach, the mechanisms themselves are not real but merely heuristic tools and have no existence until posited in theories. Thus, they are purely hypothetical entities and analytical constructs (Hedström and Swedberg, 1998).

On the contrary, in line with the scientific-realist approach, it is assumed that the causal process within the mechanism is a part of the social world, and our knowledge of the process may be more or less specific (Little, 2013). For realists, a mechanisms-based approach to social science often contrasts with the covering law model of explanation. They argue that an explanation provides an account of how the underlying mechanisms work. However, the existence of the mechanisms is not dependent upon their specification in theory and the mechanisms would continue to work in the real world even if not yet scientifically identified.

However, the dichotomy in the debate on ontic versus epistemic conceptualizations of mechanistic explanation tends to be overcome by the approach proposed by Illari, who claims to integrate both (van Eck, 2015). Ontic explanations are either real-world mechanisms themselves or show how real-world mechanisms produce real-world phenomena. Further, epistemic explanations are texts, descriptions or models, the aim of which is to provide understanding to agents on how mechanisms bring about phenomena. Thus, mechanisms shall describe the organized entities and activities by which phenomena are produced (ontic aim), and these descriptions must procure their clear understanding (epistemic aim) (Illari, 2013). From an ontological perspective, this research project assumes the existence of mechanisms as objective and external realities that can be apprehended and described.

Although the positivist paradigm and qualitative research methods may seem contradictory, positivist qualitative research represents a substantial and established type of academic inquiry (Su, 2018). For instance, scholars admit using semi-structured interviews from a positivist standpoint when the combination of epistemology and methodologies is justified in specific, singular cases (Aliyu et al., 2014). Positivist qualitative research in management emphasises novel, relevant and empirically valid outputs that can form new themes, patterns, concepts, insights, and propositions (Patton, 2002). Qualitative methods used in the investigation enrich the context of positivist research and expand its scope and depth. Qualitative designs are flexible with inductive approaches to knowledge development. In addition, qualitative research is convenient for exploring emergent, ambiguous, and

dynamic phenomena and identifying new theory development opportunities (Su, 2018). In the nonmarket environment, the flexible, contextualized characteristics of qualitative inquiry have an advantage over quantitative methods, thanks to their capacity to depict holistic phenomena of self-regulation as nonmarket strategy and unveil unanticipated elements and their relationships with other actors and their strategies.

Epistemologically, positivist qualitative research focuses on searching for regularities and causal relationships between different elements of reality and summarizing identified patterns into generalized findings. Thus, the research approach to nonmarket strategy based on mechanisms fits particularly the research program based on the qualitative positivist paradigm.

3.1.4. Exploratory cumulative case study

The general design frame of the PhD research is the case study. In this sub-section, the research design is further justified, together with the description of its main features.

The case study is recognised as a research method to contribute to expanding knowledge in social science. It allows one to focus holistically on complex, contemporary phenomena. Moreover, this type of empirical inquiry favours an in-depth analysis where the phenomena and their context are bounded, and their limits are not clear to distinguish.

In the literature, one can find different definitions of a case study, where authors refer to the case study as a research strategy, an approach, or a specific method (Grogan Putney, 2010). I consider a case study as the research approach to investigating real-life conditions, which values multiple perspectives. According to the Encyclopedia of Research Design, “Case studies consist of detailed inquiry into a bounded entity or unit in which the researcher (...) reveals phenomena through the process of examining the entity with its social and cultural context” (Salkind, 2010: 115). The case study focuses on understanding the dynamics present within single settings. Simons gives a definition that emphasizes the singularity of a case study as “an in-depth exploration from multiple perspectives of the complexity and uniqueness of a particular project, policy, institution, program or system in a “real life” context” (Simons, 2009, p. 21). I apply this holistic perspective by proposing a ‘case-oriented’ design where the case is analysed as a specific combination of conditions resulting in a phenomenon of interest.

In management and business area, case studies are a popular research method for dealing with an issue within the boundaries of a specific environment or organization. The case study method's advantages include capturing the complexities of real-life situations so that the research provides an in-depth understanding. Considering scant research on the topic and in order to answer the research question, an exploratory case study is conducted. Indeed, an exploratory case study seems to be an appropriate method for understanding dynamics in the setting where the self-regulation phenomenon under scrutiny is embedded in complex relationships with its market and the nonmarket context. Case studies are often used in exploratory research. In addition to their illustrative function, they help generate new ideas and theories which might be tested by other methods afterwards. It remains a recommended method when the research query takes the form of a ‘how’ or ‘why’ question about

contemporary events and when control over them is impossible (Yin, 2014). The thesis project fulfils these conditions, so the choice of exploratory research design is relevant.

The research design is in line with the statement that exploratory research provides a plausible and fruitful manner to examine and explain reality under the condition of rigorous critical evaluation (Reiter, 2013). This exploratory study is a “broad-ranging, purposive, systematic, prearranged undertaking designed to maximize the discovery” (Stebbins, 2011:3) of the strategic use of self-regulation in its broader social and political context. Exploration is the research of something previously unseen or omitted, characterised by its openness and emphasis on flexibility and pragmatism. One of the senses of ‘exploring’ is to search systematically and methodically for something predetermined but not fully detailed, as is the case of self-regulation strategically leveraged in the nonmarket environment. The outcome of a successful exploratory research project is to propose a new and plausible way to think about and explain reality. This type of research is by nature interdisciplinary and allows bringing valuable insights from other domains like the economy and political science. However, unlike confirmatory research, hypotheses are not tested directly. Still, the inquiry is focused on how much this statement can explain the interplay between the economic actors’ activities and their nonmarket environment and how well it can explain their positioning on nonmarket issues.

One particular use of exploratory case studies in qualitative research is understanding the concepts and theories (Maxwell, 2008). Deciding on a highly flexible, pragmatic, and adaptive exploratory case study approach allows the development of the necessary definitions, frameworks, and hypotheses for the subsequent explanatory research, if desirable. The following conviction also drives this methodological choice: an exploratory case study goes beyond the simple description or measure. Additionally, the mechanism-based approach used in the case study is in line with one of Eisenhardt’s research assumptions (Eisenhardt, 1989; Eisenhardt and Graebner, 2007), as she favours the specification of correlational relationships between constructs, avoiding any reference to causality. It allows the use of multiple insights to propose a new and innovative way to understand and interpret firm self-regulation as a nonmarket strategy.

Having identified the gap, and after the theoretical sampling for cases, the decision to conduct the cumulative case study was taken (Garreau, 2020). This approach aims to study the different cases so that the accumulation of information gathered and analysed in each case

highlights similarities or differences that enrich the holistic understanding of a phenomenon (McDonald and Gao, 2019). Therefore, the cumulation of cases extends the understanding of the phenomenon. While comparison across cases leads to the holism of the case being reduced to the few dimensions along which the case is being compared (Piekkari and Welch, 2018), by cumulating several cases, it is possible to correlate elements inherent to each case (actors, concepts, mechanisms) according to their characteristics in the case, and see if variations are visible. The cumulative approach aims at understanding variations, not at understanding the causes of these variations. Depending on its focus - descriptive or synthetic - the results of a cumulative study may be presented either as mapping/categorising identified concepts and patterns or synthetic models build on cases (Garreau, 2020). The cumulative cases approach is relevant, as models of mechanisms are developed for specific exemplars and are not represented in terms of universally generalizable and quantified statements. The potential of their further generalization involves investigating both the similarity of new exemplars to those already studied and the variations between them, the conditions that are fulfilled under such research design (Bechtel and Abrahamsen, 2005).

3.2. Empirical setting

This section presents the empirical setting of the study. It exposes the arguments that guided the choice of the French food retail sector as fieldwork, together with its description. Further, the environmental regulatory framework is reviewed according to the determined analytical unit - waste prevention policy.

3.2.1. French food retail sector as the empirical setting

The study analyses and compares the self-regulation practices of French food retailers. The industry is considered as not-regulated, even though specific regulations apply to two main topics - the location of new or enlargement of existing stores on the one hand and the relationships between retailers and suppliers on the other¹². In addition, the choice of the retail sector is motivated by its economic weight and the diversity of conducted activities. These activities enable direct action on the environmental aspects of shop management and indirect action on suppliers and consumers. This choice also seems relevant given the number and maturity of voluntary approaches. As previously explained, the phenomenon of interest is self-regulation, which is perceived as an organisational commitment to restrain its behaviour in a specific realm voluntarily. Thus, self-regulation can be observed in many domains and shall not be understood as equal to (reduced to) CSR engagements undertaken by companies, even though the two can be tightly linked in firms' practices.

The food retail sector in France is dominated by a few large retail firms managed through various organizational and ownership arrangements (groups of independent stores,

¹² First, the Royer Act from 1973 introduced the mandatory permit obtained from a specific committee of urban planning to open a new or enlarge a store (over minimum surface). Further, the Raffarin Act was passed in 1996 to protect small shops against large retailers and hard discounters by significantly reducing the threshold for a predominantly food store (300 m²). It brought two significant consequences: (1) stop in super-/hypermarket and hard discount store locations, and reinforcing dominant positions of incumbents in local markets (Cliquet et al., 2008). Second, the Galland Act of 1 July 1996 was voted to re-establish "fair and balanced trade relations". This text illustrates the legislator's concern about the increasing number of conflicts between large-scale distribution and its suppliers. The legislation has focused on regulating the well-known practice of resale at a loss and "abusively low" prices. For several decades the French government has regulated sale refusal, unjustified discriminatory practices, and below-cost selling (Colla, 2006). Yet, another Law for Balanced Commercial Relations in the Agricultural Sector and Healthy and Sustainable Food (called Loi Egalim), following the 5-month lasting national consultation consisting at national, regional and local workshops and public consultations, was voted in 2018.

integrated groups, and hard discounters being a part of integrated groups but characterised by specific market positioning)¹³. Leading food retailers in France are mainly multinational companies operating in different countries within the EU or worldwide, but the industry remains significantly culture-specific. Its development has been highly influenced by contextual elements - local legislation, consumer behaviour or geographic characteristics. Over the past two decades, the sector faced many changes due to the modernization of the EU economy (vertical integration, centralised purchasing, internationalisation of supply, significant economies of scale). The tables below represent the biggest food retail companies operating in France.

Table 10. Top Retailers in France according to turnover (revenue) generated during 2020¹⁴

Rank in 2021	Retailer	Turnover 2020	Number of stores in 2020
1	E. Leclerc	40,900	726
2	Carrefour	34,140	5,289
3	Les Mousquetaires (ITM)	25,000 ^e	2,142
4	Système U	22,210	1,615
5	Casino	17,256	5,605
6	Auchan	16,682	527
7	Lidl	14,5001	1,559

In France, the retail sector remains a major player in the national economy and enjoys significant influence on its business context¹⁵. Generally, the sector is characterised by high

¹³ The organisational differences between those groups are as follows:

Integrated groups – structure with centralized headquarters in charge of brand with international reach and company-owned stores, a network in which units are owned by the parent company and managed by the employees of this company; they have pyramidal system of governance, with decisions emanating from headquarters.

Independent (franchised groups) – cooperative of shopkeepers, a network in which each unit is based on an arrangement where one party (the franchisor) grants another party (the franchisee) the right to use its trademark or trade-name as well as certain business systems and processes, to produce and market a good or service according to certain specifications; independent distributors constitute a group of merchants to pool their resources and develop common policies.

¹⁴ in Million €; e = estimated

Source : Retail-index [<https://www.retail-index.com/countries/toprankingretailersinfrance.aspx>], retrieved on April, 9th 2022.

price competitiveness, multi-channel development and a new tendency to mix market strategies across channels. To maintain a position in a highly competitive market, retailers implement policies of transparent price messaging, format differentiation, operational efficiency, promotional excellence, and private label sophistication.

For years, French food retailers have been engaged in a price war to benefit from an attractive image among consumers. Particularly in food retailing, price is very often the main reason consumers choose one company over another. As the price is visible and can be imitated by competitors, the retail sector remains highly competitive, characterised by intense price pressure and low percentage margins. The capacity to drive downward the general level of prices depends mainly on the ability to limit purchasing costs from suppliers and/or maintenance costs (Badot et al. 2018, book distribution 4.0).

Nevertheless, in a context where the price images of the brands are becoming tighter, these are no longer a sufficient element to differentiate the retailers from one another. Also, sustainable projects implemented by retailers are generally oriented towards generating savings on shop operations without negatively impacting turnover. Companies consider that strategies in sustainable development help to improve their competitiveness not only through cost reduction but also by providing opportunities for differentiation and attracting consumers (Colla, 2018 – book *Lavorata, Sparks*). The typical development trajectory of sustainability in retail seems to be the following: it starts with a focus on the retailer's own operations (reduction of waste, energy, and water consumption, reduction of maintenance costs), further in the second phase, it turns to address the products and supply chain impact, and only afterwards retailer engages with consumers (or other stakeholders) to act upon the full impact of product purchases (Jones, Hillier, and Comfort, 2016). Adopting such a sustainability strategy answers the three challenges, that is (1) site-oriented issues - energy and waste, (2) product-oriented issues - eco-design and transport, and (3) customer-oriented issues - awareness and procurement (Barbat, Bressolles, and André, 2012).

Over the last two decades, retailers have been exposed to rising external pressure from stakeholders such as customers, NGOs, consumer associations, legislators, and local authorities. They expect the economic actors to assume their societal responsibility. This rise

¹⁵ Public opinion study by Ifop for Eight Advisory and Le Journal du Dimanche, <https://www.lejdd.fr/Economie/exclusif-decathlon-peugeot-edf-leclerc-leroy-merlin-le-top-50-des-entreprises-preferees-des-francais-4000923>, retrieved on 10.03.2021

in consumers' environmental awareness is coupled with a demand for concrete evidence of retailers' sustainable commitment and a reduced environmental impact on their purchases. Consumer associations exercise considerable power because they draw attention to various problems associated with mass retailing, amplified by the mass media to a broader public opinion (Lavorata & Sparks book, 2018).

According to a series of public opinion studies, retailers are considered among the most critical actors in taking concrete action for sustainable development¹⁶. They appear to be a credible and legitimate alternative to respond to the demand for a more responsible offer. The retailer's legitimacy in sustainable development is growing and competing with the major food industry brands. Still, most French (almost 89%) believe that the state should force companies to produce more sustainably and responsibly. Opinion conventions would require retailers to concentrate on emerging environmental concerns, as retailers are always reluctant to pursue issues that go “against the grain of customer demand in the absence of policy requirements to act” (Brook Lyndhurst, 2012:28). It is important to note that if customers move on from an issue, then it seems likely retailers would do the same (Swaffield, Evans, and Welch, 2018)¹⁷.

However, an ideological criticism of mass retailing is present in public opinion, and consumers remain sceptical about retailers' commitment to sustainability (MorinDelerm and Charriere, 2010). While many retailers have declared themselves in favour of “food transition” (communicating on their programs for “better eating”, emphasising quality and respect for nature), only 15% of French consumers have confidence in the ability of mass retailing to move in this direction. Seven out of ten respondents believe that large retailers have their share of responsibility in the economic and social crisis that France experiences, and companies remain perceived as “primarily concerned with maximising their profits”¹⁸. In

¹⁶ In 4th place in 2017 and 2019, with a visible underlying trend of growing responsibility (#6 in 2014; #5 in 2016) (Source: annual reports *Responsible Consumption Barometer* by Greenflex/ADEME, 2016, 2017, 2019).

¹⁷ This tendency is well depicted by the example of environmental information on products. The information on a product's impact on climate change is judged as an important element on the product packaging by only one-fourth of French, far behind the information on its composition (61%), origins (55%), impact on biodiversity or price distribution among various parties (Greenflex/ADEME, 2016). This may partially explain why, despite existing regulatory threats, retailers still resist the introduction of a universal information system on product environmental footprint.

¹⁸ Observatoire du rapport des Français aux formats commerciaux alimentaires, study published in January 2019 by ObSoCo, <https://lobsoco.com/observatoire-du-rapport-des-francais-aux-formats-commerciaux-alimentaires/> retrieved on March, 15th 2020.

addition, food retailers operating through hypermarkets suffer from a recurrent image problem and lack of legitimacy regarding their environmental engagements (Dekhili, 2016).

As a result, retailers invest heavily in communicating about their CSR commitments. The companies invest in sustainability actions to be perceived as responsible, aiming to respond to stakeholders' demands (Lavorata and Sparks, 2018). It is demonstrated that the price image of a brand does not degrade its CSR image, and companies may benefit from dual CSR and low-price discourse (Labbé-Pinlon, Lombart, and Louis, 2013). Thus, consumers consider that offering low prices and making environmental/societal commitments are both necessary and complementary. However, these two approaches might be difficult for a retailer to carry out simultaneously in the long term (Wang, Pham, and Dang, 2020).

In addition, the sector may be considered innovative (Berry, 2006; Reinartz et al., 2011) + Gallouj book, 2007, while new consumption trends, technologies and regulations drive its evolution. When applied to environmental issues, innovation in the retail sector mainly concerns processes and products, for instance, controlling energy consumption or eco-designing retailer own brands. However, the diffusion of these innovations to the whole sector is almost immediate, so they provide less of an advantage than a competitive non-disadvantage. Firms that want to gain a differentiation advantage through their CSR activities need to skilfully navigate the cycle of CSR innovation-communication-mimicry (Pollach, 2015) to ensure the optimal distinctiveness from other actors within the sector (Deephouse, 1999; Zhao et al., 2017) op cit. It requires retaining legitimacy by matching the practices of other firms while innovating on CSR and protecting achievements from rapid pick-up by competitors.

Moreover, retailers consider environmental issues a common challenge, and they develop a cooperative sectoral approach to cope with them. This factor plays a crucial role in nonmarket strategy, as leveraging on self-regulation generates a smoothing out, or uniformity effect at the level of the retailers.

Regarding the environmental strategies of French mass retailers, “eco-deform” (hybrid eco-defensive and eco-conforming) positioning is primarily identified (Barbat et al., 2012). This hybrid strategy corresponds to a syncretic relationship of defensive behaviours against further restrictive legislation and confrontations between competitors within a legislative framework accepted by all. Indeed, in the competitive context of cooptation, it is manifested by a joint effort focused on delaying the application of a partially defined legislative arsenal

and limited cooperation to meet the minimum requirements. Further, most retailers comply with the environmental legislation in force, as intentional non-compliance has become a problematic risk to assume concerning stakeholders. Still, companies try to avoid additional regulatory burdens. On top of that, the eco-compliant aspect of this hybrid positioning of retailers is reflected in the launch of one-off actions that reveal a context of the dominant confrontation between competitors, where the sustainability strategy is used as a market differentiation factor.

To sum up, the food retail sector is essential in supporting the economy to become more sustainable. It has real internal levers for action to reduce its environmental footprint (reduce its energy and water consumption, optimise its waste management) and change the purchasing policy while setting an example in its day-to-day management. Moreover, through their practice, retailers can guide consumers in their move towards new consumption patterns. The food distribution shops are anchored in the territory thanks to local employment and partnerships with producers and local actors, which gives them further opportunities to impact the community. Consequently, the food retail sector remains one of the key players in the evolution toward a more sustainable society. In a highly competitive context, companies endeavour to capitalize on their voluntary initiatives in sustainable development to differentiate themselves from competitors. However, self-regulation has further consequences for the market and, above all, impacts the nonmarket environment. Thus, it remains a highly interesting empirical setting for inquiring about self-regulation as a nonmarket strategy.

The retail sector undoubtedly has a key role in sustainable development on sourcing (supply-chain side) and consumption. It has a direct upstream and downstream impact on its ecosystem. Its strategic position in the centre of gravity of the national food supply chains enables companies to influence both production (greening the supply chain) and consumer awareness (promotion of green products) (Cicatiello et al., 2017; Dreyer et al., 2019). Thus, mass retailing is recognised as having a broad and significant impact on the value chain: customer service, supplier relations, design and launch of new products, and influence on consumer behaviour (Lai, Cheng, and Tang, 2010). Consequently, retailers have the power to affect the amounts of waste generated by themselves, in addition to supply and demand sides.

The retailing sector is characterized by the large scale of outlets, employees and customers, as well as the complex and extensive supply chain, with numerous large and small suppliers from around the world. This intermediary role and the financial importance of the

sector make it an appealing field to analyse in terms of sustainable practice. The scale of the operations of food retailers has a direct consequence in significant environmental footprint, visible from a physical perspective (building, large grounds). Moreover, due to the size of its activities, the sector itself generates environmental impacts linked to, e.g. store and warehouse operations, waste generation (redundant packaging, plastic bags, non-recyclable readily perishable products), transport and logistics (the transportation of the merchandise sold, need of customers to drive to stores or the delivery modes).

In addition, the retail sector fulfils all criteria to make self-regulation efficient, that is, (1) a strong natural coincidence between the public and private interest in establishing self-regulation; or (2) the existence of one or more external pressures sufficient to create such a coincidence of interest (Héritier and Eckert, 2009; Rees et al., 1997). Consequently, we observe numerous environmental self-regulatory initiatives.

After exposing the main arguments for using the food retail sector as an empirical setting for this study, the regulatory framework is further presented.

3.2.2. Regulatory framework

In this section, the legal nonmarket context of the studied phenomenon is considered. National-level institutions are considered the main driving forces for corporate sustainability (Ioannou and Serafeim, 2012). Political willingness to act on specific issues can be essential for companies to undertake self-regulation. Also, gathering information on the legal framework is essential to identify voluntary activities. The figure below sums up French national law's main environmental obligations as applied to the retail sector. It takes the form of a chronological presentation of laws and the main compulsory requirements.

The figure demonstrates that the legal environment is constantly evolving. Consequently, companies must continually adapt their practices to new requirements. It implies that the initiatives that might have been considered self-regulation at some period turn out to be no longer voluntary later on. Also, by anticipating the implementation of compulsory prescriptions (for example, due to the legally agreed transition period), companies may put in place the expected practice in advance, which might be acknowledged as “early compliance” behaviour.

Figure 6. Overview of French environmental legal framework applied to the food retail sector



The general framework on waste management in France is based on the law of 13 July 1992, which set a ban on the dumping of raw waste on 1 July 2002, reserving landfill sites solely for final waste from which all possibilities of recovery have been extracted. Economic operators are encouraged to limit their waste through fiscal measures, like the general tax on polluting activities (in French *Taxe générale sur les activités polluantes - TGAP*) in force from 1 January 2000. Further, by the Order of 29 February 2012, all waste producers must keep a waste register up-to-date.

In 2007, the Grenelle de l'environnement (French Grenelle Environment Forum) expressed the desire to set up sustainable waste management in France based on two fundamental pillars: reducing waste streams and using waste as a resource. Various measures have been undertaken in consecutive laws called Grenelle 1 and Grenelle 2. The Grenelle 1 Law (Law no. 2009-967 of 3 August 2009) is a programming law that formalises the 268 commitments of the environmental forum and focuses on their further implementation. The Grenelle 2 Law, in turn, indicates precise objectives by project and sector. Main measures regarding food retailers resulting from the law focused on: (1) the introduction of a harmonised system of sorting instructions for household packaging and appropriate signs on products, (2) the extension of Extended Producer Responsibility channels¹⁹, resulting in the creation of new Producer Responsibility Organisations²⁰, (3) regarding stores over 2500 m² selling food and mass consumption products – a creation of a dedicated zone "at the checkout" for recycling and collecting over-packaging from products purchased in this establishment.

¹⁹ Regarding waste, the Extended Producer Responsibility principle was confirmed, as it has existed in French law since 1975 and is codified in article L. 541-10 of the Environment Code. Under these principles, manufacturers, own-brand distributors, and importers who market products that generate waste must assume the responsibility (financial and/or physical) for managing this waste (the treatment or disposal of post-consumer products). Public authorities use it to provide incentives to prevent wastes at the source, promote product design for the environment and support the achievement of public recycling and materials management goals. Some 20 Extended Producer Responsibility chains were progressively set up in France till 2016, and the creation of ten or so additional schemes between 2021 and 2025 was acted in 2020.

Source : <https://www.ademe.fr/expertises/dechets/elements-contexte/filieres-a-responsabilite-elargie-producteurs-rep>

²⁰ A Producer Responsibility Organisation is a private company entrusted by the public authorities with the general interest mission of taking charge, within the Extended Producer Responsibility framework, of the end-of-life of the equipment they put on the market. It is authorised or financed collectively or individually by producers, which can take responsibility for the collection and channelisation of specific types of waste generated from the 'end-of-life' of their products to ensure environmentally sound management of such waste.

Further, the Grenelle 2 bill transposes the European Directive of 19 November 2008 on waste (Directive 2008/98/EC) into the national legal system²¹. The directive establishes a hierarchy between the different waste and bio-waste treatment methods, introduces prevention as a policy priority and requires the Member States to take measures to develop the sorting and recovery of bio-waste. As long as bio-waste from the retail sector is concerned, additional national regulations on protection against health risks are applied²². In addition, ICPE regulations regarding classified installations for protecting the environment frame the operation and exploitation of waste recovery facilities regarding methanisation and composting.

The Law on the energy transition for green growth from 2015 (in French *Loi n°2015-992 du 17 août 2015 relative à la transition énergétique pour la croissance verte*) (hereafter the Energy Transition bill) further encouraged the fight against waste through its sorting and recovery. In line with this law, Decree 2016-288 of 10 March 2016 requires waste producers and holders (companies, businesses, administrations, etc.) to sort five waste streams at source from 1 July 2016: metal, plastic, glass, and wood.

The Circular Economy Roadmap²³, published in April 2018 by the Ministry of Ecological and Solidarity Transition, sets out the operational details of the transition. It aims to move the national economy from a linear economic model of "manufacture, consume, throw away" to a circular model that integrates the entire life cycle of products, from their eco-design to waste management.

²¹ Decree no. 2011-828 of 11 July 2011, contains various provisions relating to the prevention and management of biowaste and specifies several important points concerning the application of the regulation on biowaste. It takes up the EU definition of bio-waste, which is "any non-hazardous food or kitchen waste from households, restaurants, caterers or retail outlets". Further, the Order of 12 July 2011 sets the thresholds and deadlines from which producers and holders of biowaste must comply with the obligation to sort and recover. Also, two Circulars of 10 January 2012 and of 13 December 2012 precise rules on the application of source separation of biowaste by large producers, and explain the main activities concerned and the operating rules for local composting facilities.

²² These texts aim to prevent the spread of pathogenic agents in humans and animals. For instance, they define all the measures to be applied for the collection, transport and organic recovery of Animal By-Products. According to the Order of 12 July 2011 that sets the thresholds and deadlines from which producers and holders of biowaste must comply with the obligation to sort and recover, a typical hypermarket producing around 200 tonnes of biowaste per year was directly from 2012 under the obligation to recover biowaste. The stores of the surface of 500 m² fall into obligation from 2016 on.

²³ In French *La feuille de route économie circulaire* (FREC)

<https://www.ecologie.gouv.fr/feuille-route-economie-circulaire-frec>

Simultaneously, various other requirements are linked to waste prevention and management, even though they are not classified in the environmental legislative framework.

For instance, detailed regulations exist regarding extra-financial information disclosure by firms. Adopted in 2001, the Law on New Economic Regulations, otherwise known as the NRE Act, required that listed companies disclose information in their annual report about measures taken to account for their activities' environmental and social impacts. No provision concerning sanctions was included in the NRE Act²⁴. However, Article 225 of Grenelle 2 Law made compulsory extra-financial reporting (covering the scope of social and environmental impact) for all publicly listed companies from 2012 on, and progressively (for the next three years) for non-listed companies with at least 500 employees and a minimum of 100 million Euros turnover. Companies must also seek independent third-party verification for their reports and an opinion about the sincerity of the information presented²⁵. Since the Decree of 19th August 2016 (modifying Article R225-105-1 of the French Code of Commerce), significant direct (Scope 1) and indirect (Scope 2 and 3) GHG emissions linked to the supply chain have to be declared, covering both upstream and downstream emissions.

Also, since the end of the 1980s, French companies have been encouraged to donate unsold products through fiscal policy measures. The 1989 finance law (Article 238 bis of the General Tax Code also known as the Coluche law or amendment) created an additional tax deduction for companies donating to certain charitable and humanitarian associations known as "organisations for helping people in difficulty"²⁶.

Over the last ten years, legislative acts issued in France have often been accompanied by the general principle of developing voluntary programs on national and regional/local

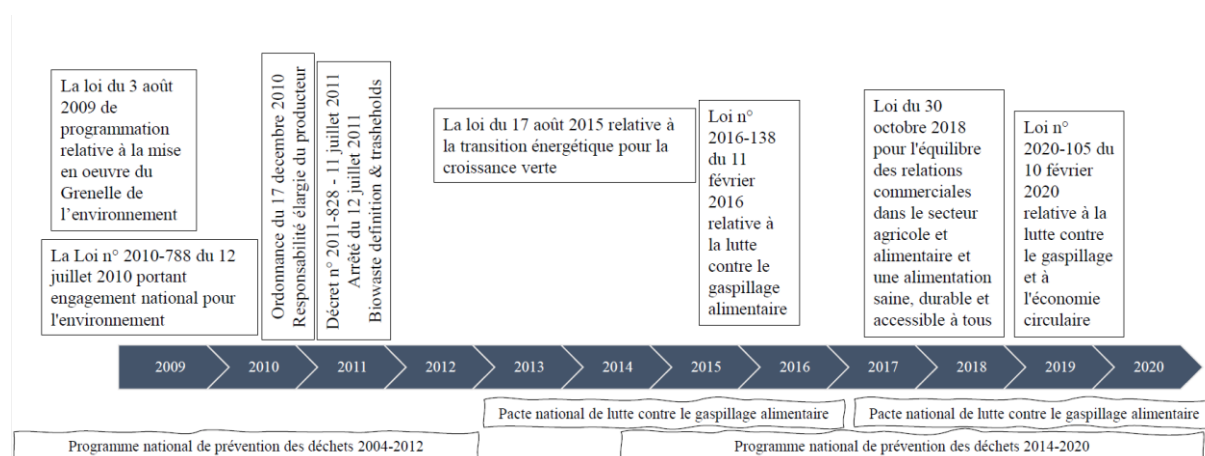
²⁴ In following years, yearly studies have been published by the auditing companies. A study done in February 2010 by independent French rating agency Vigeo showed the interesting disparity in levels of reporting between different sectors. The distribution sector had an average disclosure rate of 71%, in comparison to the best noted telecommunications 76% and the least noted financial sector 53%.

²⁵ For listed companies: from the fiscal year beginning December 31, 2011. For unlisted companies: from the year ending December 31, 2016.

²⁶ The Coluche law allow companies to benefit from a tax reduction of 60% of the amount donated, regardless of the company's tax regime (income tax or corporation tax). The ceiling was limited to 5 per thousand of the annual turnovers, as specified in article 238 bis of the General Tax Code (0.5%). Some modifications of the thresholds have been introduced afterwards, but the principle of functioning remains the same. The company can deduct the excess of the payments linked to the sponsorship from its tax for the next 5 financial years, respecting the ceiling for each financial year.

levels. The national programs are often pluriannual initiatives intended to be renewed (and improved)²⁷. Figure 8, on the next page, presents the main initiatives.

Figure 7. Chronology of legal acts and national programs



Description of the figure: The legal and executive acts are indicated above the timeline, and the national voluntary programs are below. Concerning laws presented in the figure, the rectangle's width indicates the time of a political debate on the text until the vote.

The brief overview of the legal framework evolution demonstrates that from the legislator's point of view, waste management issue remains subordinate to other environmental policies and various regulations are scattered across different laws. Further, the legislative agenda has accelerated, and recently laws introducing significant changes and new provisions are issued every two years. It should be noted that for each legislative text, multiple implementing acts are issued (i.e. decrees and ordinances) in the following years. Also, the earlier requirements are often reprioritized and hardened or extended in subsequent texts.

In order to consider the nonmarket environment comprehensively, one ought to acknowledge its legal features and political and social elements. Indeed, in the nonmarket context, firms interpret multi-layered institutions. Also, companies position themselves regarding divergent signals from other actors (political, social, or economic) about the demand for regulatory action on a given environmental issue.

²⁷ For instance: 1st National Waste Prevention Plan was introduced in France from 2004 on (for next 8 years), while 2nd National Waste Prevention Plan covered the period from 2014 to 2020.

Section 3.2 presented the empirical setting of the research, including sectoral challenges in terms of sustainability and environmental issues. The following section (3.3.) discusses the sampling for cases.

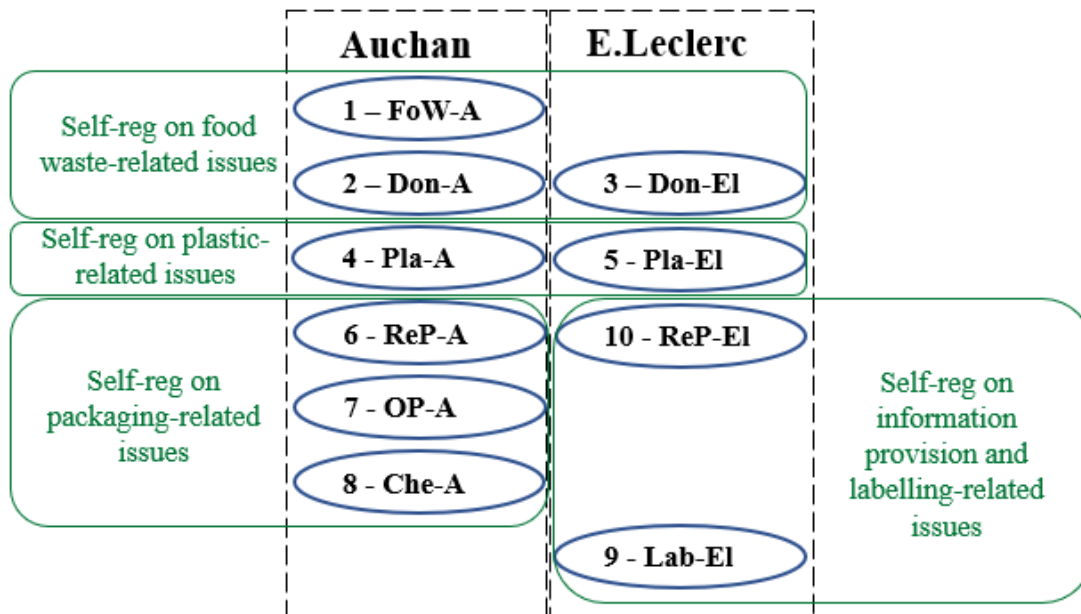
3.3. Sampling for cases

The study analyses self-regulation as a nonmarket strategy by investigating how French grocery retailers address the problem of waste prevention and management in their day-to-day operations and how they leverage existing voluntary practices in the nonmarket context. The empirical setting of the study relies on environmental protection practices that can be accounted as an element of CSR policy. However, it should not remain confusing for further reading that self-regulation is a distinct phenomenon that can cover a broader spectrum of issues (managerial practices, operational transparency, technology, quality policy, fiscal policy, supply chain, *etc.*).

In exploratory research, cases are chosen so that each one can provide significant insights into the underlying conditions and mechanisms at work. Cases are selected to demonstrate a high level of clarity regarding the unveiling of connecting mechanisms and links. They should convey abundant empirical information depicting how and why something comes about. Then exploratory cases should be selected because they offer analytical richness.

In this research, the selected projects of self-regulation under scrutiny are observed for two different companies from the same industry. Consequently, the global context of cases is similar. The self-regulation initiatives are observed in four different domains. Ten cases are used to conduct this cumulative study, and each serves as an extension of previously obtained results to complete, confirm, or contrast them.

Figure 8. Design for cases in the research project



The examples of self-regulation projects come from two distinct companies. However, an enterprise as a whole is not considered in this research as a complete case. For reasons of feasibility and relevance in tracing nonmarket mechanisms, our case is constituted by a company in the specific domain where self-regulation is observed. The main objective of this design is to reveal activated nonmarket mechanisms while, in practice, retracing the mobilization of self-regulation as a nonmarket strategy. It is done by reducing the case's complexity by studying each initiative separately as an independent self-regulation project.

Corporate self-regulation is a phenomenon visible in various domains. Thus, I analysed companies' behaviour separately within each preselected issue to observe how nonmarket mechanisms unfold. Only afterwards the results are cumulated between cases. Studying cumulatively several self-regulation domains commonly present in the retail sector helps to find the coherence in the general corporate approach to self-regulation as a nonmarket strategy.

3.3.1. Selection of companies

The companies being investigated were selected based on specific criteria. The panel includes two competitors in the food retail sector having distinctive characteristics. The fact that within analysed companies, one firm is an integrated group, and the other function under a franchising system, allows for comparing the self-regulation activities in different organizational structures, as each has its specificities (Le Bot *et al.*, 2022). The table below presents their main characteristics, and each company is further described in the sub-sections.

Table 11. Main characteristics of selected companies

Name	Auchan	E.Leclerc
Year of creation	1961	1949
Functional structure	Integrated	Independent - cooperative
Headquarters	Villeneuve d'Ascq	Ivry-sur-Seine
Capital	French	French
Number of sales points in France in 2018	540	691
Type of stores ²⁸	Hypermarket Supermarket Convenience Drive	Hypermarket Supermarket Drive
International operations	Yes, worldwide	Yes, in Europe

²⁸ Hypermarket - Complex, offering a wide range of products, often shopping mall managed by one company;

Supermarket - Suppling a range of food and beverage products, additionally may supply products from the home, fashion and electrical products market, retail goods at low prices;

Convenience – Mini-market located in residential areas, offers a limited range of products at premium prices;

E-tailer / Click-and-collect (Drive)- Shop on-line via the internet and buy products which are then delivered or picked-up by the customer itself.

3.3.1.A – Auchan

Auchan was founded in 1961 by Gérard Mulliez. It is an integrated group and family-owned company. Hence it is not listed and, consequently, does not arouse covetousness of competitors or investors. The retailer's multi-channel strategy in France consists of about 140 hypermarkets, with the remainder split between supermarkets and a relatively new convenience format. Like its competitors, Auchan continues to develop an extensive network of drive locations. Auchan's strategy has historically hinged on developing large retail parks outside urban clusters, where it deploys retail businesses to create and build shopper traffic. The hypermarkets accompanying these retail parks have traditionally been large (more than 9,000 m² of selling area) and accommodated a wide variety of goods in a low-cost setting. Only in recent years, along with the gradual decline of hypermarkets, Auchan has opened up smaller proximity-focused formats.

The disappointing financial results in 2013 motivated radical measures to be implemented at the beginning of 2014. The top and middle management structure has been reshuffled completely, and the retailer engaged in additional price campaigns on thousands of products to compete with the increased market price pressure. The official reorganization within the group took place in 2015 (reorganization of structures on the national and international levels), followed by an effective structural rapprochement between different formats (hyper- and supermarkets) in 2017. The activity-based organisation has replaced a format-based organisation with five entities with three structures, including Auchan Retail which covers 98% of the group activity²⁹.

Since 2010, the company has positioned itself as a “responsible discounter” and introduced a new logo into its communication. It was characterised by green colour, contrary to the traditional red one. It indicated the company's new positioning that varied significantly from the former brand's slogan, "Live better, live cheaper".

²⁹ LSA, La nouvelle organisation d'Auchan à la loupe, published 04/11/2015, <https://www.lsa-conso.fr/la-nouvelle-organisation-du-groupe-auchan-a-la-loupe,224028>

Figure 9. Auchan's logo



In 2011, Groupe Auchan celebrated its 50th anniversary by presenting its first sustainable development report, ‘Act, become, commit, develop, build’³⁰. The company claimed three sustainable ideas: (1) build and operate sustainably, (2) promote an internal approach to sustainable progress, and (3) reduce the ecological impact of freight transport. Also 2011, it joined the Global Compact initiative. Auchan is also a member of Forum Retailers’ Environmental Action Programme on the EU level. The implementation of a new, sustainable strategy, “For an ambition of profitable, sustainable and responsible growth”, began in 2013 with the objective of differentiation through responsible business policies³¹. A year later, Group Auchan sums up its corporate vision with the slogan ‘We are daring merchants’³². Further, 2018 was announced as the year of the circular economy for Auchan Retail France. The company actively participated in the workshops conducted by the Ministry of Ecological and Solidarity Transition, which fed into the national CSR roadmap.

Overall, Auchan has already set numerous sustainable activities addressing all four life cycle phases (production; distribution, logistics and retail place; consumption; end-of-life). The activities tackle various topics, including sustainable and locally sourced products, packaging, resource efficiency, consumer behaviour, food waste and waste recycling. Increasing sustainable and locally sourced products is a main topic and focuses on fish, palm oil, wood, cotton, cosmetics, and local sourcing, amongst others. Several measures are already implemented regarding packaging (e.g. eco-design for bottles, and optimisation of packaging to increase transport efficiency). Auchan’s measures toward consumers include awareness-raising programs, information campaigns and activities with customers' direct involvement. To combat food waste, Auchan stores apply a series of measures to reduce the number of binned items, like optimising the choice of product ranges, the improvement of warehousing in stores, display of items with short best-before dates, and last but not least, food donations. In addition, the company is working continuously to improve waste sorting and cooperate with well-organised local partners regarding treatment. Since 2008, it has worked on a project

³⁰ In French : ‘Agir, devenir, s'engager, developper, construire’.

³¹ Auchan’s sustainability report 2013.

³² In French ‘Nous sommes des commerçants audacieux’.

regarding the methanization of food waste in France, knowing that approximately 5% of the store's energy consumption can be covered by applying this concept. Concerning critical raw materials, Auchan focuses on a responsibility scheme for own-brand non-food products to guarantee their reparability and ensure that customers can return broken products and get back a repaired one instead of being wasted.

In 2001, Auchan France published its first CSR report: "Auchan, a responsible company". Since April 2012, according to French law, Groupe Auchan has been subject to non-financial reporting obligations and certification by an external third party.

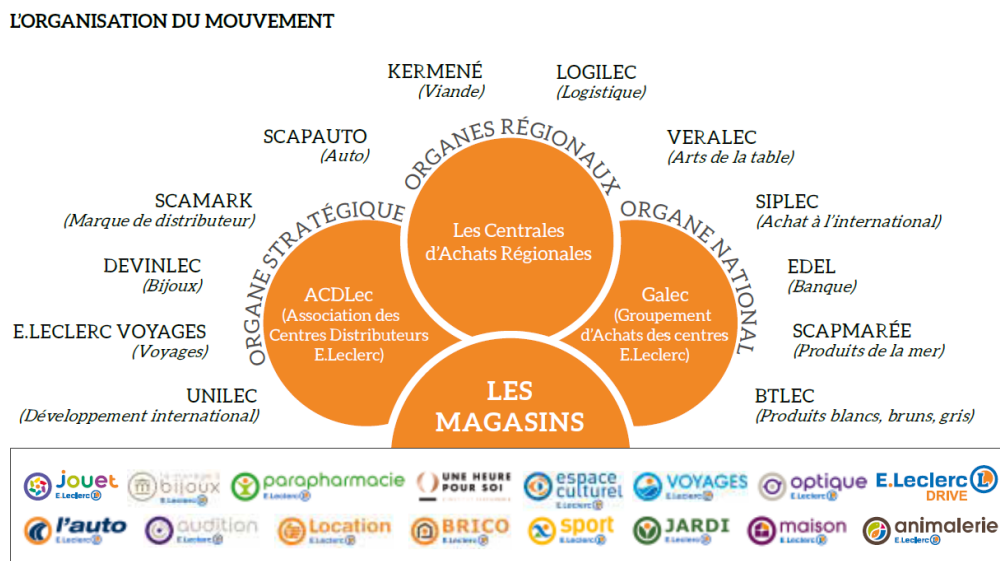
3.3.2.B – E.Leclerc cooperative

Founder of the E. Leclerc group, Edouard Leclerc opened his first store in Landerneau (Brittany) in 1949. The movement is based on the collaboration of independent retailers who own stores with an E. Leclerc fascia. In 1969, the structure of the E. Leclerc group was settled with the creation of the Association des Centres Distributeurs E.Leclerc (ACDLec) in charge of the aspects of retail policy, the GALEC (fr. Groupement d'Achat des Centres Leclerc = purchasing group of the Leclerc centres) and the regional purchasing agency (Scarmor, Scapnor, Socomaine, etc.). In total, it operates approximately 700 affiliated stores, of which 520 are hypermarkets, and 175 are supermarkets. Additionally, the retailer has developed an extensive drive network in recent years. The retailer's national strategies are implemented at the local level by the store owners; this translates into a highly customized offer catering to the needs of local shoppers, ultimately leading to a high level of loyalty.

E.Leclerc cooperative has been among France's Top 3 grocery retailers for the last two decades. Its success has resulted from its low-price proposition (in-store and online) and a high percentage of quality private-label products. By continuing to be aggressive on price and making significant investments to drive expansion, E.Leclerc has gained considerable ground as a historical market leader. The cooperative also emphasised improving the non-food ranges (books, drugs, and opticians) to maximize the appeal of its store locations.

The figure below presents the structural organisation of the E.Lecerc movement.

Figure 10. Structural organization of E.Leclerc cooperative



Source: E.Leclerc CSR report, 2016.

The E.Leclerc cooperative's motto is 'committed retailer'. It is represented by a charismatic leader - Mr Michel Edouard Leclerc - clearly identified by the public and very active in media, which undoubtedly facilitates institutional communication, including sustainable development issues.

Figure 11. E.Leclerc sustainability ambitions expressed by its president M.E. Leclerc

Translation: "You will judge us on our achievements [...] By 2020-2022, Leclerc will be the best performing retailer in terms of CSR..."

« Vous nous jugerez sur nos réalisations [...] D'ici 2020-22, Leclerc sera l'enseigne la mieux disante en matière de RSE... »

Michel Edouard Leclerc



Chaire Grande consommation ESSEC - 23 mai 2018

Source : Veille Economic Circulaire de Mme Benchmark pour l'Institut du commerce, 2018

The strategic goal announced in 2017 was to lead the E. Leclerc centres to the European podium of best companies in terms of sustainable development and quality to reactivate the company's social and environmental promise. The Strategic Committee maintained and reaffirmed the goal for consecutive years. It was largely diffused in advertisement campaigns. Since 2020, three axes of sustainable development have been considered priorities: (1) nutrition and health, (2) sustainable industries and production, and (3) environmental footprint reduction.

E.Leclerc has already set numerous sustainable activities; however, their practice is disparate from one store to another. The cooperative has been engaged for over 20 years in reducing the distribution of single-use plastic bags. This initiative has genuine nationwide outreach and has been perpetuated since 1996. Also, other thematic campaigns, like 'Cleaning nature', have been organised systematically for many years.

In 2008, aware of its significant carbon footprint due to the number of operating sites (stores and warehouses) and specificity of retail activities (volume of goods transported and sold every day), the group launched a pilot project on the overall environmental impact of some products throughout the entire life cycle (manufacturing, transport, consumption, and recycling). It took place in two stores. In addition, a dedicated website was created, but the project didn't last for a long time. Also, it's a year of establishing the Quality and Sustainability Committee in charge of CSR policy within the E.Leclerc structures.

However, the specificity of groups' governance mode and organization has a negative impact on self-regulation uptake. Implementation of environmental projects depends on the store owner's awareness/willingness, and many initiatives remain local or limited in their timespan. Moreover, individual stores are regularly pointed out in the media for their non-sustainable practices. E.Leclerc's communication strategy mainly insists on green consumption, so the retailer is considered as a relay of information on what to do by the final consumer in terms of sustainable development (Lavorata, Est, and Mugel, 2017).

Regarding CSR reporting, E.Leclerc issued a document called 'Magazine' in 2016 to present some of their initiatives. A year after, a manifest was published to share the global vision of the retailer with its stakeholders. Consequently, periodic reports based on a standard methodology were presented for 2018 and 2021. Sustainability reporting is not compulsory for individual shops. Only one regional purchasing unit has undertaken such an initiative.

3.3.2. Selection of dimensions for self-regulation practice - waste prevention and management

The study focuses on self-regulatory initiatives regarding waste prevention and management, as defined in the waste management hierarchy by the EU³³. Waste generated in retail is composed of the following materials: paper, plastic, and wood, whereas metal and glass are counted in much less proportion. In addition to the waste generated by unsold products (for various causes), a large part of the waste result from logistics and storage operations. All groceries are confronted with a specific problem of food waste. It indicates an unsustainable food production, distribution and consumption system closely linked to other global social and environmental challenges. Essentially, food waste mitigation addresses a range of global socio-economic and environmental concerns (for instance, overconsumption, poor diet, and shortage of landfill sites). Indeed, food loss and waste have become an issue of great public concern³⁴. Consequently, food waste should be reduced, but where this is not possible, it should be redistributed, used for animal feed or anaerobic digestion (waste to energy process) and then incinerated or sent as a last resort to land fill.

Depending on the type of product/material that would become waste, various solutions might be implemented to limit the onsite waste production. The possible solutions are presented in Appendix 2. This list was used primarily to identify voluntary corporate engagements in the data. Various solutions require different resources to be implemented and produce results over different periods. Some of these solutions must be accompanied by introducing new managerial practices or specific software while implementing all in-store practices must be coupled with personnel training. Also, the visibility of the voluntary initiatives varies considerably, thus impacting the retailers' nonmarket environment unevenly. Retailers would focus primarily on the activities that possibly impact their image among final customers. For instance, the initiatives that are taken on the store level and can be quickly and directly on-site communicated to clients are privileged.

³³ EU Directive 2008/98/EC on waste (Waste Framework Directive), <https://ec.europa.eu/environment/waste/framework/>

³⁴ The United Nations' 2030 Agenda for Sustainable Development reflects the increased global awareness of the problem. Target 12.3 of the Sustainable Development Goals set in 2015, calls for reducing by half *per capita* global food waste at retail and consumer levels by 2030. This goes in pair with the reduction of food losses along the production and supply chains..

Closure and Transition

This chapter outlines the adopted research design allowing for better comprehending and perceiving differently organisational self-regulation. In line with the positivist paradigm, inquiry aims to explain the self-regulation phenomenon, ultimately enabling predictions on its strategic use in nonmarket environments. The positivist qualitative research paradigm presupposes that only “facts” derived from the scientific method can make legitimate knowledge claims. Ontologically, it assumes the existence of an external and objective reality and the possibility to apprehend it and depict, while epistemologically, it focuses on searching for regularities between different elements of reality. Further, identified patterns are summarised into generalized findings in form of mechanisms.

The research project is conducted as an exploratory, multiple, cumulative case study. Each case study is constituted by the self-regulation project(s) implemented in a specific domain. The research setting is the French food retail sector, and two companies were selected for a detailed analysis of their waste management and prevention policy, that is Auchan and E. Leclerc. The food retail sector has considerable economic importance in France. Its key position between suppliers and consumers allows self-regulating firms to influence the behaviour of many other actors, and as a consequence to have an even greater socio-economic impact.

As demonstrated in this chapter, the legal environment regarding waste management is built upon restrictive waste production and disposal prescriptions. However, it is characterised by a diversity of legal requirements and the complexity of the regulatory system. In addition, economic actors are controlled but also encouraged to improve their policies through the rules and regulations in force. The large panoply of measures makes the institutional environment complex while providing advantages for companies acting pro-ecologically and penalizing unsustainable practices.

A comprehensive research strategy based on chosen design allows for answering the following questions: (1) what data are relevant? (2) what data to collect? (3) how to analyse the results? Thus, the following chapter will present in detail the data collection and analysis strategy.

CHAPTER 4. DATA COLLECTION AND ANALYSIS

This part gives an overview of the conducted research regarding data collection and analysis. It reviews the data mobilised in the research and discusses their utility in a qualitative exploratory study. The chapter further details methods, which are the specific tools or techniques used in collecting and interpreting evidence. The adopted research strategy focused on the identification of mechanisms is presented in six consecutive steps. The last section of chapter 4 discusses the quality of the research, regarding such elements as construct validity, reliability, and external and instrument validity.

The key elements of this chapter are as follows:

- Data collection (4.1.),
- Data analysis (4.2.),
- Quality of the research (4.3.).

For the detailed comprehension of the data analysis that allowed the postulation of mechanisms (including cases' reconstruction and identification of mechanisms), one can read Chapter 4, then Appendixes 12 to 16, then Appendix 11 and the final results presented in Chapter 5.

4.1. Data collection

Case study research relies on multiple evidence sources and typically combines different data collection methods - data triangulation³⁵ (Patton, 2002). The research paradigm applied to the case study is a qualitative one. In positivist qualitative research, the input of the research process consists of various data (interviews, documents, images), often not structured. The research program considers flexible and opportunistic data collection methods, which allows one to take advantage of emergent themes and unique case features (Eisenhardt, 1989). A key benefit of utilizing diverse forms of data is creating a “thick description” that captures detailed content and rich context of the studied phenomena (Geertz, 1973). This procedure aims to develop converging lines of inquiring from other evidence. Any case study finding or conclusion is likely more accurate if it is based on different sources of information, following a similar convergence.

As “qualitative data are (...) complex and contexted” (Richards, 2011:34), the challenge of qualitative research is to make them useful, valuable, and relevant. The data collected was treated in consecutive phases providing information on (1) general context and retail sector functioning, (2) environmental legislative framework and self-regulation initiatives within the industry, and (3) companies and their self-regulation projects chosen as cases. These elements were exposed in the previous chapter regarding the empirical setting.

However, the phases of the work – design, data collection, and analysis – overlapped; in fact, the on-field research has taken the form of an iterative process. Analysis of early data contributed to a new emphasis in the interviewing process; reciprocally, information collected during the interviews enriched and directed the search for documentation.

³⁵ Patton identifies four types of triangulations, that is 1) data triangulation (regarding data sources), 2) investigator triangulation (among different evaluators), 3) theory triangulation (regarding various perspectives applied to the same data set) and 4) methodological triangulation.

4.1.1. Overall data collection process

For this project, the evidence in analysis derives from interviews in terms of primary data collection and various text sources for the secondary data. The table below gives an overview of the complete data set.

Table 12. Overview of the complete data set

Type of data	Sources	Total number
PRIMARY DATA	Semi-structured interviews	33
SECONDARY DATA	Legislative texts	16
	Reports and studies (official and grey literature)	73
	Official documents from industry federations	15
	Corporate documents	45
	Press articles	796
	Websites content	54

All data sources are discussed in detail in the following parts of section 4.1. and the appendixes, when relevant.

4.1.1.A - Primary data collection – interviews

Within the portfolio of qualitative research methods, in-depth semi-structured interviews were chosen to collect primary data on the ground. The interview is considered “one of the most important sources of case study evidence” (Yin, 2014:110), as they opt to provide rich and multi-sided data. Qualitative interviews provide contextualized responses from research participants about their views, opinions, feelings, knowledge, and experiences (Creswell, 2009). Their purpose is often to explore meaning, understanding, and interpretations, as they participate in the complex process of information and meaning construction.

Semi-structured interviews enable participants to reveal their opinions and generate rich datasets, thus facilitating an in-depth analysis of the subject matter. Moreover, they allowed open-ended probes and gave the informants the possibility to use their own terminologies.

Also, this method is appropriate to direct interviews toward issues and concepts that best represent interviewees' experiences, providing thick descriptive data. Given this study's aim, this type of data was deemed suitable for collecting rich data on environmental practices and their leverage as a nonmarket strategy. Indeed, the interviews with individuals are considered highly informative in a mechanisms-based approach (Bromiley and Johnson, 2005) while providing details on managers' knowledge, decision-making process, and issue perception. As required by the research ethics and to enable participants to speak frankly about their experiences within their organisation, participants were guaranteed both confidentiality and anonymity. All participants gave their informed consent for the interviews.

The interviews aimed to explore the specific study field, the retail sector, and the organizational practices – their origins, implementation, outcomes, and potential paths for valorisation regarding nonmarket constituents. A series of preliminary interviews were conducted with representatives of sectoral associations and consultancy companies. Afterwards, the participants from the two companies were asked to share their perspectives on corporate policy regarding waste prevention and management and their operational experiences.

The interview guide was developed based on findings from the literature review, content analysis of corporate materials and expert interviews. Interview themes were designed to cover major subject areas: corporate sustainability strategy emergence and evolution; governance; corporate policies tackling food waste and legislative context; approaches to on-field waste management (past and current); voluntary initiatives regarding existing and future legislation; stakeholder management; and communication. The interview guides can be found in Appendix 5. The interview guides were constructed to cover a scope of themes, and the examples of questions are only a sample. Their list is not exhaustive. During interviews, questions were adapted to each interlocutor's position and experience.

A standard recommendation in methodology literature is to conduct qualitative interviews in an environment that is familiar and non-disturbing for research participants. Privacy and comfort are crucial aspects of a physical interview environment (King and Horrocks, 2010). Thus, I tried to guarantee that the place was quiet, also, for the sake of good quality of the recordings. All interviews took place at the time slot the interviewees chose, mostly at their working place. Therefore, interviews were conducted in various locations. Also, it is suggested that outsiders (other people than an informant and a researcher) should

not intervene during the interviewing process (Hennink, Hutter and Bailey, 2011). It happened twice that the interview was disturbed by the phone call but had no further significant incidence on the conversation. On the other hand, two interviews took place in a coffeehouse; therefore, I had to deal with interruptions by a server. In addition, in those two cases, the environment was quite noisy, which did not negatively affect the comfort but largely influenced the quality of recordings and hindered the transcription process.

The total number of interviews is 33. They took place from mid-2019 to early 2021. Due to the sanitary restriction (from March 2020 on) and geographical distance, 17 took place by phone and two by using a universal conference call tool. The interviews were recorded and lasted from three-quarters of an hour to one hour and a half in length. The total of registered interviews presents over 35,5 hours. All interviews were fully transcribed. It gives 466 single-spaced transcript pages for further treatment. Data analysis was ongoing, and interim findings were regularly fed back to the interview schedule to inform subsequent interviews.

4.1.1.B - Secondary data collection – press articles

The empirical data of the press corpus consisted of articles from French print media. The constitution of the corpus was done in two phases – first from the Factiva database and next from Europress. Regarding the two companies chosen for the study, the final selection of articles for coding from the Factiva database accounted for 615. Further, 181 additional articles were withdrawn and coded. The total number of articles coded individually for Auchan and E.Leclerc is 796, as presented in the table below.

Table 13. Number of press articles citing each company used in the press review

	Auchan	E.Leclerc	Total
Articles withdrawn and coded from Factiva	308	307	615
Articles withdrawn and coded from Europress	85	96	181
Total number of articles	393	403	796

The corpus accounts for 880 single-spaced pages in Word format (Times New Roman 11). The exact methodology for press article selection and further details are presented in Appendix 4.

4.1.2. Industry-level data

The industry-level data were gathered through interviews and complemented by documentation. It was made of public reports, technical notes as well as of annual reports, and registration documents produced by the leading actors identified. The sources providing information on the political environment can be divided into two categories: (1) the legislative text and the information directly linked to their elaboration or implementation, and (2) official reports and studies issued by national agencies.

4.1.2.A – Primary data collection – expert interviews

Expert interviews are a widely used qualitative interview method to gain information about or explore a specific field of action. The semi-structured interview method was chosen for primary data collection at the industry level. The recruitment procedure had two stages: (1) identification of organizations of interest and then (2) identification of individuals within organizations suitably placed to answer our questions. Potential interviewees were contacted individually (via e-mail or professional social media) and invited to participate in the research project directly. The representatives of the following organizations agreed to share their experience: Fédération du commerce et de la distribution (Federation of Commerce and Distribution), Perifem, national environmental agency ADEME (henceforth ADEME) and four sustainability consultancy companies. Also, three competitors were interviewed. All interviews took place in 2019 as a part of the exploratory phase, mainly to gain a better understanding of the context and give the background information for further investigation. According to the type of organization that the interviewee represented, the general objectives were as follows:

- provide insights from industry associations on their policy and sectoral initiatives, as well as understand the contribution of various retailers to the implemented collective projects,
- provide insights from consultancy companies on waste prevention/management services and their collaboration with retailers,

- provide insights from policy actors on the expected impacts and limits of the regulation and other policies on retailers within the waste prevention/management domain,
- provide insights from competitors on their waste prevention/management activities and collaboration with other retailers.

Detailed information on all interviews conducted with industry experts within the research project is provided in Appendix 6. The information gathered thanks to the interviews was complemented by the secondary data. Their collection process is explained hereafter.

4.1.2.B – Secondary data collection – legislative documents, policy papers, official reports

An extensive collection of secondary data regarding the existing and draft legislation and official analysis on specific issues, national initiatives and pilot projects was compiled. Also, some official statistics were used in the study. These secondary sources are issued chiefly by national institutions and agencies. The lists of sources are provided in Appendix 7.

First, the documents allowed the reconstruction of the legislative framework. Second, they help enrich the framework by adding a chronology of legislative attempts, consultations, and deliberations on the legal texts. Further, this data provides a deeper understanding of the legislative context and its evolution.

4.1.2.C – Secondary data collection – grey literature

Other important sources of information were the industry associations – Fédération du commerce et de la distribution (henceforth FCD) and Perifem.

The FCD is a professional organisation representing around fifty retail and wholesale companies with a predominance of food retailers³⁶. The FCD intervenes in the domains like

³⁶ FCD brings together retailers categorised as integrated companies/groups, such as Aldi, Auchan, Carrefour, Casino, Cora, Leader Price, Lidl, Match, Spar, among others. The *Fédération du commerce coopératif et associé* (FCA) is the sectoral representation of independent retailers operating under common brand, such as E.Leclerc, Intermarché, Groupe U.

food safety, sustainable development, economic relations (SMEs, industrialists, agricultural sectors), relations with social partners and subjects related to regional and commercial town planning. The sectoral organization aims to defend its members' general and shared interests. It represents them in dealings with public authorities of various types - economic and social bodies, official or private. One of its activities is lobbying at the National Assembly and the EU institutions. It studies issues common to all or several of its members and provides them with documentation and professional information.

On the other hand, Perifem is a sectoral technical association with a triple role in managing relations between its members and political decision-makers. It (1) provides regulatory monitoring on the EU and national level, (2) transfers information on political initiatives, together with comments regarding possible impact on the sector, and (3) actively participates in consultations on projects of laws and/or decrees. Additionally, it works with the retail sector's ecosystem in order to find and promote technical solutions, organize an exchange with service providers and share best practices. The researcher was granted "member" access to Perifem's internal network, where all documents published since July 2012 are available. The publications take the form of analyses of current legal issues, position statements on waste policy, as well as presentations of service providers.

Both associations provided a series of contextual documents listed in Appendix 8. Their total number is fifteen, including three sectoral voluntary agreements, press releases, briefing notes and studies.

Further, various documents used as a source of contextual information categorized as "grey literature" were collected. Grey literature stands for manifold document types produced by academics, businesses and industry in print and electronic formats protected by intellectual property rights. They include technical reports, research reports, studies, and surveys, among other things. Over forty documents of that type were gathered and used in further analysis. Diverse actors published them: auditing and consulting companies, think tanks, nongovernmental organizations, etc. They cover a large scope of issues, from general studies on sectoral sustainability, through detailed statistical reports on food waste, to analyses conducted on specific issues like providing consumers with information on the environmental impact of products or using paper catalogues for advertisement. A table summarising the documentation is presented in Appendix 8.

Finally, twenty-two pages of website content were retrieved from different web platforms presenting retailers' sustainable initiatives and promoting implemented projects. The following websites were used: BipiZ (<https://www.bipiz.org/>) - an international database referencing good CSR practices; Magasin responsable (<http://www.magasinresponsable.com/>) - the website created by Perifem, crowding the press releases about the retailers' sustainable initiatives (online form June 2019); Refresh/Resource Efficient Food and dRink for the Entire Supply cHain (<https://www.eu-refresh.org>) – the EU research project taking action against food waste gathering twenty-six partners from twelve EU member states. Also, commitments and activities undertaken on the EU level within the Retail Forum for Sustainability were scrutinized (https://ec.europa.eu/environment/industry/retail/index_en.htm).

4.1.3. Corporate level data – Auchan and Movement E.Leclerc

The corporate level data covers two companies - Auchan and E.Leclerc. The data was collected in a purposeful, however, iterative manner. First, a large part of secondary data was collected and analysed to nourish the phase of direct exchange with informants. Subsequently, a series of interviews were conducted, and additional documents were collected for analysis based on the information provided. Also, some people responded positively to my invitation to interview only after several months and repeated reminders. To avoid a delay in the whole data collection process, secondary data were collected simultaneously.

The data on self-regulatory initiatives are either directly extracted from the corporate level data, or results from the preliminary content analysis, thus it comes from the intermediary results.

4.1.3.A – Primary data collection – interviews

Recruitment for interviews was essentially convenience based. Convenience sampling is justified when the study informants are difficult to access, or their population is limited (Veal, 2006). Grocery retail managers fit this description. Following a pre-developed research methodology, a list (contacts database) of potential informants was constructed. Potential interviewees were invited to participate in the research project directly. The prospective interviewees were contacted individually, through social media for professionals or by e-mail. In most cases, it was necessary to revive the demand for the meeting several times. I also participated in two events organised by the sectoral associations to present the research project and gain new contacts. The initial list of potential participants included initially few dozen of names. It was progressively extended over time from grocery retailers in France – taking into consideration the current and past positions of people and companies they work(-ed) for.

Interviews with personnel from different retailers, both at the strategic level (sustainable development managers) and the operational level (store or technical managers), were conducted. The scope of predetermined professions covered those directly concerned with waste prevention and management issues in their operations, representing sustainability

departments, technical directors, public affairs managers, stores managers, and logistics and packaging managers. The interviewees worked for central/corporate structures or on the local level. For both companies, the latter represented France's Nord and Auvergne-Rhone-Alpes regions.

When selecting willing participants, the following criteria were applied: managerial position within a specific company/organization, managerial experience linked to sustainability issues, and familiarity with the waste management issues affecting the store operations. The recruitment also considered the managerial position to account for the diversity of opinions and food waste management approaches. Finally, to correlate various perspectives, a dozen of representatives from each organization were interviewed.

A request for the meeting was sent to each prospect. It explained the purpose of the research and the main ethical rules for conducting this type of inquiry. Recruitment of willing participants was laborious, as work commitments prevented many from participating. Moreover, some managers declined to contribute to the project by referring to corporate information non-disclosure policies. The example of the messages, comprising a short description of my PhD objectives and explanations about the interviewing procedure, is presented in Appendix 9. Hereafter the lists with details on conducted interviews for each company are presented.

Table 14. List providing the details on interviews conducted with representatives of Auchan

	Position	Time	Place	Transcription pages
1	Performance Manager - Energy and environment	1h	Paris	13
2	CSR Reporting Manager	55'	Paris	13
3	Director Sustainability Service Corporate	1h02'	Paris	14
4	National Coordinator Technical Exploitation	1h01'	Call – region	12
5	Regional Coordinator Technical Exploitation	2h51'	Call – region	37
6	National Coordinator Waste Policy	1h16'	Visio – region	17
7	Institutional Relations Director	1h15'	Call – region	11
8	Public Affairs Director	59'	Call – Paris	14
9	Public Affairs and Communication Director	47'	Call – Paris	9
10	CSR Project Manager	1h02'	Call – Paris	14
11	Store CSR Director	51'	Call – region	11

Table 15. List providing the details on interviews conducted with representatives of E.Leclerc

	Position	Time	Place	Transcription pages
1	CSR Project Manager 1	1h04'	Paris	12
2	CSR Director	1h	Paris	15
3	Senior Manager - Waste	1h17'	Paris	21
4	Regional Director / Store director	52'	Call – region	11
5	Director of Sustainability Committee	53'	Call – Paris	11
6	Director of three stores in the North Region	1h09'	Call – region	12
7	CSR Project Manager 2	1h08'	Call – Paris	12
8	CSR Project Manager for a division	46'	Call – Paris	10
9	Packaging Manager	50'	Call – Paris	11

4.1.3.B – Secondary data collection – official documents, reports, press releases, and website content.

Secondary data collection consists of pre-existing written records. The documents regarding the companies directly include official publications and reports, press releases, and newspaper articles. Documents used in the research serve two primary purposes, to corroborate the evidence from other sources and augment the information collected. The possibility of getting some institutional information before conducting the interviews gave an opportunity to better understand the positioning of the companies on specific subjects and therefore adapt questions when conversing with respondents. The secondary data regarding each company include:

- extra-financial/sustainability reports and policy statements issued from 2009 to 2019 (within this timespan, not all retailers have published yearly reports),
- official dossier or press realises available via corporate websites, and
- content of retailers' websites (retrieved during 2018 and 2019) or websites of other organizations/platforms presenting companies' environmental initiatives and implemented projects together with their context.

Extra-financial reporting is issued for internal and external stakeholders, providing an account of the organisation's achievements, and outlining future goals regarding

sustainability. Reports are published (usually) every year. It helps track retailers' approaches to CSR issues, and their communication evolved over time.

These secondary sources allowed identifying actions carried out by retailers that the company was willing to communicate and examine various discourses – turned to institutional actors and the public. In particular, archival documents transcribe the organisation's cultural values and allow for an in-depth understanding of the defence mechanisms or adherence to new values introduced over time. Together with more recent documents, they also make it possible to reconstitute an organisational process's chronology and identify its various participants. They thus enrich and qualify the events described by the actors during the interviews. The detailed description of sources for both companies is presented in Appendixes 9 and 10.

4.1.4. Summary of collected data and triangulation

Within the research project, multiple sources of data were used for analysis. I collected primary and secondary data on both – company and industry levels. The table below gives an overview of all data collected. Overall, the data accounts for nearly 7000 pages of text, sometimes accompanied by images. This section demonstrates that various data sources provide solid evidence based on different perspectives. Further, the detailed data analysis procedure and methods used in this study are presented in section 4.2.

Table 16. General overview of the industry-level data

INDUSTRY-LEVEL DATA			
Data	Details on data	Amount/location	Use in analysis
Primary data			
13 semi-structured sectoral interviews	The duration is between 45 and 87 minutes. All audio recorded and transcribed.	Approximately 186 single-spaced transcript pages	<ul style="list-style-type: none"> - Provide insights from consultancy companies on waste prevention/management services and their collaboration with retailers. - Provide insights from competitors on competition and their non-market strategies. - Provide insights from policy actors on the expected impacts and limits of the regulation and other policies on retailers in the waste prevention/management field.
Secondary data			
16 legislative texts	Regulatory and institutional documentation on the EU and national level	Approximately 802 pages	Determine the legislative framework (legal and regulatory objectives) and trace its evolution.
30 official reports and studies	Documents issued by national agencies from 2008 to 2019	Approximately 1065 pages	<ul style="list-style-type: none"> - Provide a deeper understanding of legislative context and its evolution. - Obtain national figures on waste in the industry.
15 official documents from industry federations	Agreements on commitments, position statements, press releases, briefing notes	Approximately 163 pages	Provide context on business self-regulation within the food retail sector.
43 reports and studies	Grey literature - reports and sectoral analysis issued by consultancy companies, business schools, an NGOs	Approximately 2214 pages	Provide context and follow sectoral evolution.

Table 17. General overview of data collected at the corporate level

CORPORATE LEVEL DATA			
Data	Details on data	Amount/location	Use in analysis
Primary data			
20 semi-structured interviews	The duration is between 46 and 171 minutes. All audio recorded and transcribed.	Approximately 320 single-spaced transcript pages	Provide insights from retailers (different units) on their waste prevention/management practice and its relevance within the corporate nonmarket strategy.
Secondary data			
15 documents - CSR Reports and policy statements	10 for Auchan and 5 for E.Leclerc - various timespan for each company	Approximately 923 pages	Provide insights on retailers' corporate CSR strategy and the place of waste prevention/management within it.
30 documents - Dossiers or individual press releases	Press releases from 2010 to 2019 on waste prevention and management issues	Approximately 136 pages retrieved	Official communication on engagements and sustainable practice
34 documents - Companies' websites content	Content dedicated to sustainability and voluntary initiatives (from 2005 to 2020)	Approximately 194 pages retrieved	Secondary data to inquire about general public communication.
20 documents - Other websites content	Reports, platforms, or local cambers websites presenting retailers' CSR initiatives and implemented projects	Approximately 56 pages retrieved	Directory of waste prevention/management initiatives that companies and institutional actors promoted.
Nearly 800 press articles	Articles published in French print media from 2009 to mid-2019	Corpus accounts for 880 single-spaced pages in Word format (Times New Roman 11)	Enrich the understanding of how voluntary practices were leveraged for broader communication in general and specialised media.

Methodology mobilises various and complementary data sources according to the principle of multi-angulation defined by Hlady Rispal (2002). It refers to data triangulation from oral and written sources and data collection methods. In social research, triangulation is associated with using multiple methods and measures of an empirical phenomenon to corroborate data and reduce bias.

Data triangulation refers to using in study various data sources, including time, space and persons. It is aimed at corroborating findings, as any weaknesses in the data can be compensated for by the strengths of other data. Data drawn from a more diverse set of sources and their diversity ensures a more comprehensive look at the phenomenon. Also, triangulation of observations can ‘clarify meaning by identifying different ways the phenomenon is being seen’ (Stake, 1994, p. 241). Thus, in this study, both secondary and primary data were used. Their triangulation increases the research validity, thereby increasing the results' validity and reliability. The table below provides an overview of data triangulation.

Table 18. Data triangulation

Action	Means
Data collection	Sectoral associations - Interviews & Documentation
External data	Consulting companies - Interviews & Documentation
	Web platforms on environmental practices - Documentation
	Press articles - Documentation
Data collection	Sustainable development directors - Interviews
Internal data	Technical and operational managers - Interviews
	Sustainable development reports, financial reports. Press releases, Websites' content - Documentation

Methods triangulation uses multiple methods to study a phenomenon. The core strength of methods triangulation is its potential to expose meaningful information that may have remained undiscovered with the use of only one approach or data collection technique in the study. The table below presents how the principle of methodological triangulation was applied to this study.

Table 19. Methodological triangulation

Action	Means	Objective
Data collection	Primary & secondary	Validity of evidence through cross-verification from various source
	External & internal	
	Organizational & industry level	
Applying different interview techniques	Preliminary interviews	Collect information on the industry level Understand the specificities of the observation unit Guide data collection for each case
	Interviews after documentation data analysis	Enriching previous data Coherent interpretation, reformulations
	Interview guide	Validity of the information provided Validity of cumulative case analyses
Analysis of press corpus	Coding	Validity of evidence
	Topic Modeling	Enriching previous data
Writing a case study report	All collected data used and coded	Structuring the analysis
		Easing the extension from cumulative cases

Tables 18 and 19 present how triangulation of data and methods were used to guarantee the quality of research.

4.2. Data analysis

The research question relates to the functioning of self-regulation as a particular nonmarket strategy. The results are presented in the form of mechanisms operating in the nonmarket environment. Thus, to conduct data analysis, I adapted the procedure of empirical research according to the mechanism-based approach proposed by Wight (Wight, 2015). The author indicates a research strategy based on several steps. However, he stipulates that these are not necessarily the only stages to implement, and their order can be modified. The main analytical work was focused on moving from identifying the phenomenon to describing mechanisms. The construction of the mechanism-based model remains conditioned by the mechanisms' identification and description appropriateness. It results from an investigation of relations between different nonmarket mechanisms. Therefore, after the reflection on the most appropriate manner to analyse the data, the following steps of the research strategy were retained:

Main steps of mechanism-based research strategy in data analysis:

- (1) Preliminary content analysis to delimitate the nonmarket context.**
- (2) Identification of the corporate self-regulation initiatives.**
- (3) Reconstruction and analysis of cases.**
- (4) Identification of mechanisms that provide insights regarding mobilization of self-regulation in the nonmarket environment.**
- (5) Description of the identified nonmarket mechanisms and their context.**
- (6) Proposition of mechanism-based model.**

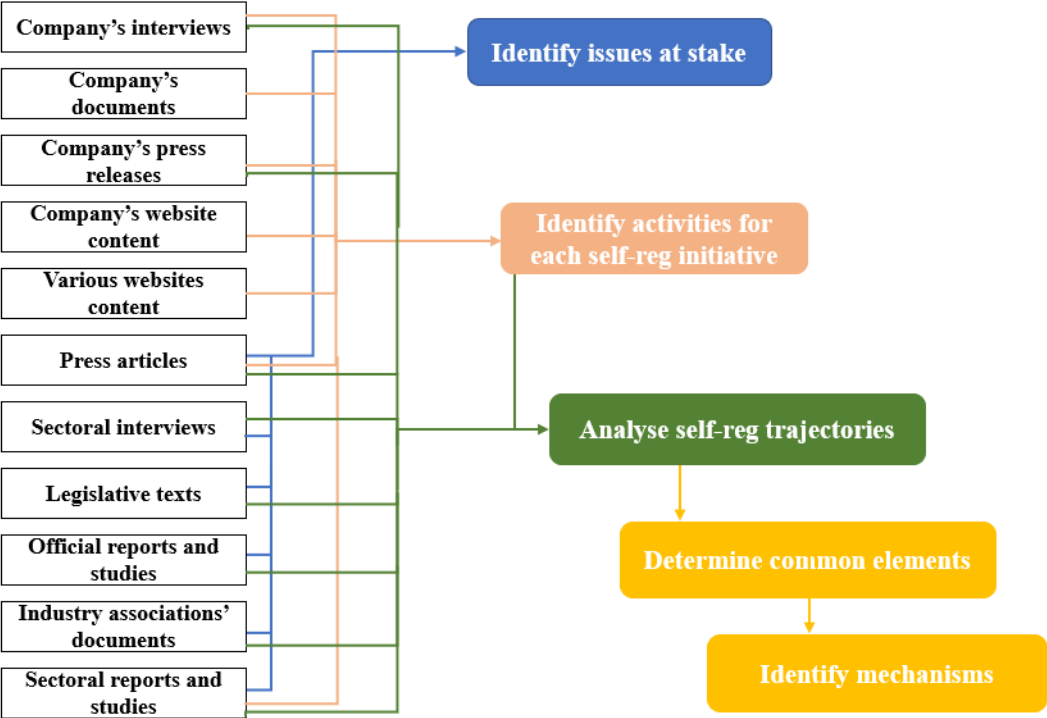
The mechanism-based research strategy was operationalised into successive analytical steps with the main practical objective focused on identifying and describing nonmarket mechanisms based on self-regulation. In the preliminary work, the regulatory and competitive contexts were scrutinized to identify environmental issues in the retail sector (step 1). The phenomenon studied being self-regulation, it was crucial to identify the corporate voluntary

initiatives, programs and activities, as well as the circumstances of their implementation and further outcomes (step 2). Next, according to the mechanistic description, the reconstruction and analyses of ten self-regulation cases (step 3) allowed the determination of the relevant component parts and their organization. Afterwards, analyses were conducted to articulate elements into the operating mechanisms (step 4) and finally, the identified mechanisms were described in detail (step 5). As the general conditions of mechanisms functioning were scrutinised, a question on what the expected outcomes might be was answered.

The identification and description of mechanisms were the main objectives of the research in order to answer the question of “How does self-regulation operate as a particular nonmarket strategy?”. However, an additional research strategy step (6) was implemented to complement and enrich the contributions. A proposition of the mechanism-based model for self-regulation as a nonmarket strategy was formulated.

Various sources of data were exploited in consecutive steps of analysis. In positivist qualitative research, the phenomenon of interest is not isolated from its context. Thus, in the initial data analysis phase, the data treatment provided evidence of voluntary corporate engagements and contextual elements of the nonmarket environment. The overview of data exploitation is given in the figure below.

Figure 12. Sources of data and their usage in analyses



The sectoral data were used to explore the study's empirical setting. All corporate data, press articles, sectoral reports, and studies allowed identifying activities within self-regulation projects (step 2). Once each self-regulation project was determined, sectoral data were used again to confront corporate behaviour, legal prescriptions, and other external pressures exerted on the company. Consequently, the "self-regulation trajectories" were revealed and ten cases were reconstructed (step 3). The following analytical steps were applied to the intermediary results (newly created data) obtained from the previous phases.

Further, each analytical step is elucidated.

4.2.1. Preliminary content analysis

The principle analytical technique applied to the quasi-totality of data was content analysis (Franzosi, 2004) *via* multinominal coding. Coding is the primary categorizing strategy for qualitative analysis aimed at ‘fracturing’ data and rearranging it into categories that facilitate comparison between elements in the same category and between categories. In addition, coding data is considered essential in qualitative research to analyse a large amount of qualitative data in a rigorous manner (Ayache and Dumez, 2011) and mitigate the risk of circularity (Dumez, 2016:19).

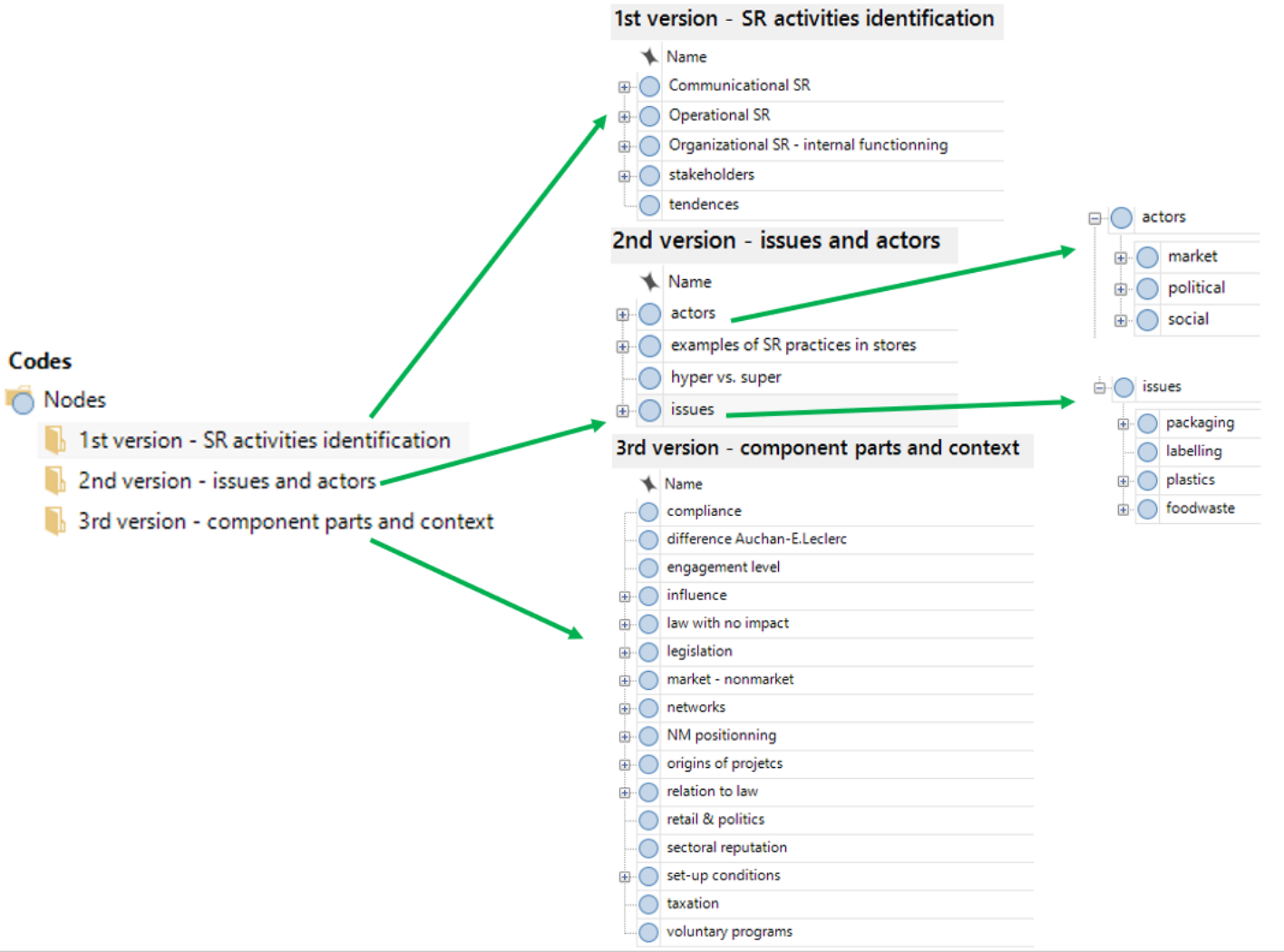
The categories applied in coding were both driven from existing theory (preconceptions) and inductively generated during the research. The multinominal coding method was chosen for several reasons. First, multinominal coding allows conceiving that each unit of meaning can be attached to several "codes", which seems appropriate to the research where the relations between content and context are essential. Second, it also makes it possible to work, in this way, on differences and similarities (Ibid., 76). Finally, while some codes are drawn from the literature, others have emerged from the material.

All collected data were coded with the aid of Nvivo software. It is a useful tool helping to manage, organize, and retrieve large amounts of text, videos, images, and other forms of qualitative evidence. However, it has to be recognized that such a qualitative program is not designed to “analyse” data itself. *De facto*, every aspect of qualitative analysis relies heavily on the researcher's interpretative and analytic procedures carried out by the researcher.

The coding was executed in parallel with data collection. Several versions were established. First, a descriptive coding to identify various voluntary activities and their chronology according to the established list of solutions to reduce the waste generation in the retail sector (version 1 – self-regulation organizational, operational and communicational practices). Then, the consecutive version for identifying the topics and actors (version 2). Finally, analytical coding according to mechanisms’ potential component parts and self-regulation contextual elements (version 3).

The figure below presents the general scheme of different coding versions.

Figure 13. Example of consecutive phases of data corpus coding



I proceeded with a careful review of the corporate materials to deduce the sections and passages that dealt specifically with waste prevention and management issue. The content analysis of corporate data (reports, press releases, websites' content, and media articles) was done, starting with descriptive coding to identify, and put in chronological order various self-regulatory initiatives, and then thematic coding searching for the elements indicating the possible nonmarket issue settlement (issue, actors, arenas). It was conducted to understand better the importance attributed by the companies to specific nonmarket issues and their positioning.

Further thematic analysis was conducted by closely examining all data texts (interviews, transcriptions of videos, and documents). I used theoretical categories to identify elements invoking the concept of mechanisms (for instance, trigger, set up conditions, entity, and outcomes). The analytical work of categorisation required revision of previous codes. Once the coding was done, it was necessary to make sense of each of the nodes and especially the reciprocal links and influences between different actors, activities, and their implementation contexts. At this point, I read and refined descriptions of all verbatims within already created categories for a better understanding, if the category contained too many elements.

The second-order coding applied to the data was the axial one (Point, 2018). I followed the logic of connecting strategies – looking for relationships that link facts and events within a particular context into a coherent whole instead of fracturing the initial text into discrete elements and re-sorting it into separated categories. According to Maxwell's classification of analytical categorizing (Maxwell, 2005), I started by creating descriptive, substantial categories based on the preestablished list and enriching it by adding some inductively developed codes.

Next, I linked the specific activities to larger categories (*e.g.* trajectories) regarding a nonmarket strategy. It was a part of the work to clean and merge repetitive elements, simplify the structure of sub-codes and decide what significant elements shall be used in further analysis. Revisiting coding to check the development of categories and 'coding on' from coded material to create new categories or merge them is a common practice in qualitative research (Richards, 2011).

4.2.2. Identification of corporate self-regulation initiatives

While based on our definition of self-regulation, step 1 was dedicated to identifying it in each case. Detailed preliminary analysis served as a base for the further listing and chronological ordering of various corporate activities linked to the waste policy. Further, I set out the implementation context for various activities to determine an initiative as self-regulation. It was essential to align self-regulation activities according to the chronology of legislative prescription and broader regulatory context. These contextual elements are described in detail in Chapter 3.

Within the general waste policy for each company, four domains were selected for detailed analysis: (1) food waste policy, including (2) food donations, (3) policy on plastic, and (4) packaging and sustainability labelling. First, activities related to food waste were linked to more general policies on bio-waste. However, the differentiation was made following the prevention paradigm (avoiding food waste versus treatment of unavoidable bio-waste). Second, the policy on plastic has gone through significant evolution, from the focus on plastic bags to the broader approach to all plastic (packaging, single-use items). Third, the packaging issue covers a wide range of initiatives, from a simple reduction of over-packaging to a general eco-design policy. Last, the question of labelling concerns not only directly the packaging of products but, more broadly, informational policy on product composition and environmental impact. Some issues are tightly linked, for instance, plastic policy and packaging or packaging and labelling. The distinction is operated to facilitate the analyses and ease of description.

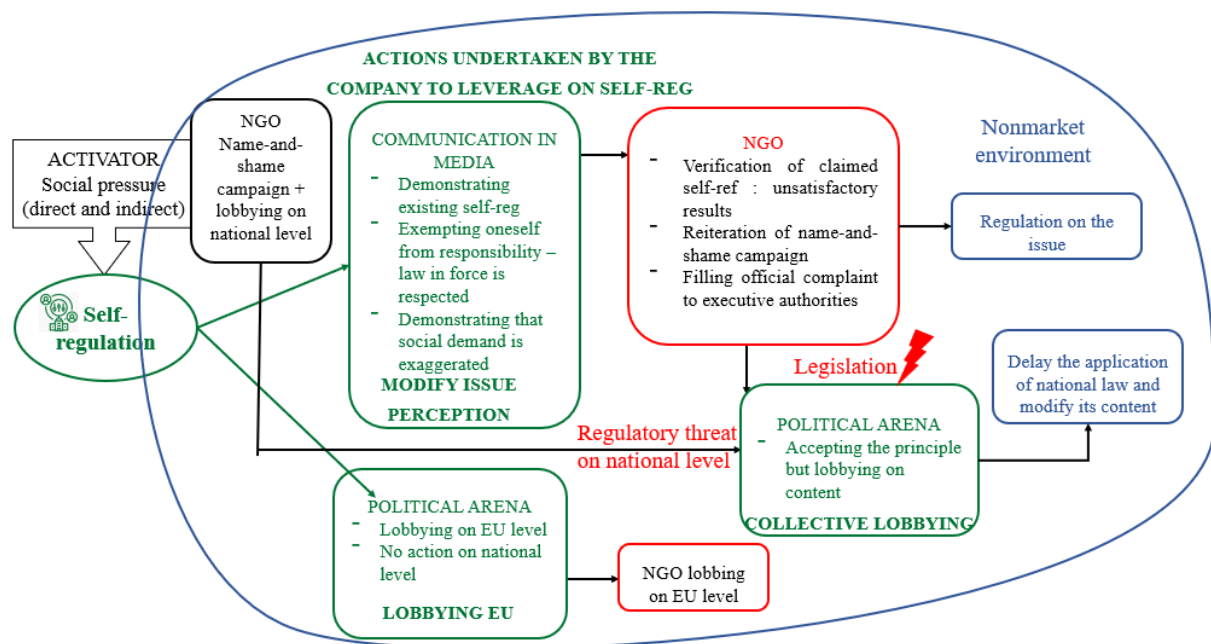
Multiple activities were conducted by companies to tackle each identified issue. For each analysed domain, the main characteristics I looked for in data were as follows: activity undertaken in non-regulated scope, or beyond compliance initiative (if already existing regulation), and date of implementation. Each initiative was identified and accompanied by a brief description of implementation circumstances, objectives, timeline, and results when relevant. For example, at this analysis stage, I could find evidence that some self-regulatory initiatives had been taken on individual-store level and remained as isolated activities. In contrast, others started as purposeful pilot projects and afterwards were enlarged to other stores or somehow naturally spread across the company following the successful functioning in test locations. The table below summarises the multiple voluntary initiatives within each case.

Table 20. Self-regulatory initiatives undertaken by the companies

Case	Self-regulatory initiatives	
1	FoW-A	Participation in pilot projects led by different institutions (ADEME, regional council); Engagement in collective agreements; Local, ad-hoc initiatives; Commercial solutions for customers to adapt their purchases; Partnerships with NGOs, and service providers; Public awareness campaigns
2	Don-A	Partnerships with NGOs, service providers
3	Don-El	Partnerships with NGOs, service providers
4	Pla-A	Withdrawal of products from the sale; Engagement in collective agreements; Supply-chain partnership
5	Pla-El	Withdrawal of products from the sale; Public awareness campaigns
6	ReP-A	Operational adaptation; Supply-chain partnerships
7	OP-A	Operational adaptation (eco-design, selling areas)
8	Che-A	Internal pilot project
9	Lab-El	Participation in a pilot project led by ADEME; Public awareness campaigns; Pilot projects on a local level; Operational adaptation (eco-design)
10	ReP-El	Partnership with an NGO; Operational adaptation

The analysis of self-regulatory initiatives conducted by the companies guided the initial reconstructions of relations between entities and activities - an example is presented in the figure below.

Figure 14. Example of an initial visualisation of self-regulatory trajectories considered individual cases (6 - ReP-A)



4.2.3. Reconstruction of cases

The data at this stage of the research project: (1) present sequences of self-regulation activities, (2) involve multiple levels of analysis (individual store activity, an official pilot project covering a few stores, universal retail group’s engagement) with no clearly identified boundaries, (3) have divergent temporal embeddedness, (4) remains eclectic. To structure and order the data, I treated them according to process data analysis by applying the visual mapping strategy (Langley, 1999; Lerman, Mmbaga, and Smith, 2022). Indeed, the visual mapping strategy is useful to generate patterns (however, not necessarily detecting mechanisms) in theory building. Such a strategy allowed for overcoming the shortcomings of the descriptive approach thanks to the possible simultaneous representation of different dimensions while illustrating relations between identified events, activities, and contextual elements. This is an intermediary step between the narrative description of raw data and more abstract conceptualization in the form of mechanisms. It remains coherent with the idea that it “needs several cases in a moderate level of detail” to generate patterns (Langley, 1999: 696) and requires observations of similar processes. More precisely, each case is drawn from a succession of events composed of entities (nonmarket actors) and their activities (actions and interactions), as the issue moves through the nonmarket life cycle (issue-settlement).

In step 3, I identified ten self-regulatory policies, that were used as cases for further analysis. The table below gives a brief description of the cases.

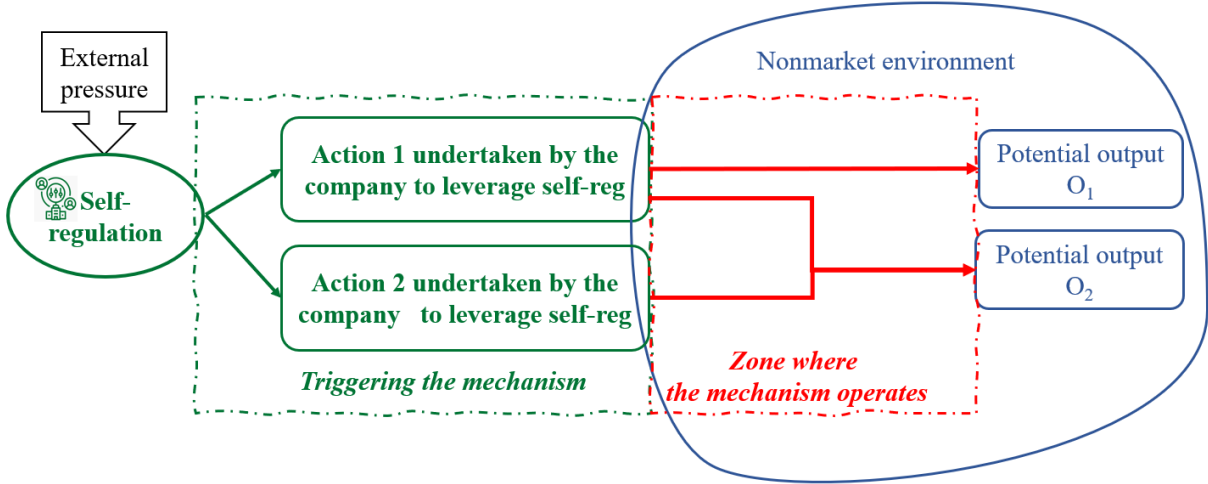
Table 21. List of ten cases used in the research

	Case	Brief description
1	FoW-A	Auchan’s engagement to fight against food waste
2	Don-A	Auchan’s engagement to promote the donation of unsold food items
3	Don-El	E.Leclerc’s engagement to promote the donation of unsold food items
4	Pla-A	Auchan’s engagement to make plastic policy more circular
5	Pla-El	E.Leclerc’s engagement to stop distributing plastic bags and other items
6	ReP-A	Auchan’s engagement to limit the chemical substances in the recycled packaging
7	OP-A	Auchan’s engagement to eco-design of packaging
8	Che-A	Auchan’s engagement to promote the selective waste collection
9	Lab-El	E.Leclerc’s engagement to provide clients with environmental information regarding their purchase
10	ReP-El	E.Leclerc’s engagement to limit the chemical substances in the recycled packaging

I attributed to each case a number and the code, that helps to determinate the domain of self-regulation and the company. The order of cases does not have any specific signification. The identified cases illustrating how a company leverages self-regulation in the nonmarket environment are further exposed in Appendix 11. Graphical representations enrich their description.

The figure below explains the schematical representation used as a visual model for cases. As a reminder, I investigate how self-regulation can be utilized in the nonmarket environment and not how effective it is in shaping an issue’s evolution.

Figure 15. Explanation of the visual representation of cases



Self-regulation constitutes a fundamental element of the trajectory. Therefore, it is indicated on the left side of the scheme. The activator indicated in red colour depicts an external factor (pressure excreted on the company) that triggers the mobilization of self-regulation in the nonmarket environment. Further, in green colour, the action(s) undertaken by the company to leverage self-regulation are presented. In the figure, the actions are numbered to indicate that the same voluntary initiative can be further harnessed in different nonmarket arenas; thus, it is possible to find multiple actions carried out in parallel. This also makes it easier to follow the progress of the trajectory but does not indicate the order or importance of the activities. In such a case, it is indicated by multiple arrows coming out from the figure indicated as self-regulation. The principal element of the scheme subjected to detailed analysis is marked as a “zone where the mechanism operates” in red colour. For the sake of simplicity, a singular form for the mechanism is used in the explanatory scheme. However, a trajectory may denote one or more potential nonmarket mechanisms. Precise

identification of consecutive events hidden in red arrow(s) allows for defining component parts and their relations. Consequently, the final results of the research work are based on analyses of these trajectories' red arrows – the zone where the mechanism operates. The table below is a compilation of basic information on ten trajectories.

Analysing each case separately and then cumulating the findings allows for observing how nonmarket mechanisms are deployed by leveraging self-regulation activity. The analyse of trajectories included potential outcomes within the nonmarket environment. It gives a global vision of mobilization of self-regulation as a nonmarket strategy. Indeed, complementing the mechanism discovery by the contextual elements increases the results' predictive power.

Table 22. Cases of self-regulation mobilization in the nonmarket environment

Case		Goal - mobilising self-regulation to...	Activator(s)	Existing self-reg	Entities	Actions
1	FoW-A	challenge the legislative proposal	Political pressure	Yes	company media, sectoral association policymakers	communicating in media individual lobbying sharing good practices
2	Don-A	move out of the political arena	Political pressure	Yes	company competitors, service providers policymakers public	communicating in media sharing good practices
3	Don-EL	change the political arena landscape	Political pressure	Yes	company NGOs service providers policymakers	communicating in media aligning with stakeholders introducing a new issue in a political bargain
4	Pla-A	engage new actors in the political arena	Social and political pressure	Yes	company activists, NGOs policymakers	launching a partnership lobbying by supplier complying in advance engaging in multistakeholder initiative
5	Pla-EL	change the political arena landscape	Social and political pressure	Yes	company stakeholders policymakers.	launching social campaigns communicating in media trans-sectoral lobbying

Case		Goal - mobilising self-regulation to...	Activator(s)	Existing self-reg	Entities	Actions
6	ReP-A	influence the content of executive acts	Social pressure	Yes	company competitors, suppliers, NGO policymakers	communicating in media launching online petition lobbying on the national and the EU level
7	OP-A	introduce alternative solution	Social pressure	Yes	company NGOs, media, activists, policymakers	launching online petition communicating in media lobbying introducing new issue in the political bargain
8	Che-A	challenge the law	Competitive pressure	No	company sectoral association, policymakers	launching self-regulation project communicating collective lobbying justifying no compliance abandoning lobby strategy
9	Lab-EL	introduce an alternative normative institution	Political pressure	No	company market stakeholders, policymakers	launching self-regulation project establishing an alternative institution complexifying the nonmarket environment
10	ReP-EL	modify stakeholder relations	Social pressure	No	company NGO, activists/consumers	adapting business practice communicating launching a partnership

4.2.4. Postulation of mechanisms

The identification of the nonmarket mechanisms based on self-regulation is at the heart of the exploration. The mechanism-based explanation essentially involves conveying an understanding of how the entities, activities and their organization produce the phenomenon. Knowledge generated through the mechanistic approach is actor- and action-oriented. While existing research on nonmarket strategy provides information about entities (actors) that can be considered constitutively relevant (playing a role in the mechanism's functioning), analytical step 2 provided information on the phenomenon's composing parts (entity + activity). The constitutive relevance of components is conditioned by their spatial (location, size, shape, position, and orientation) and temporal (the order, rate, and duration of the component activities) parthood (Kaiser and Krickel, 2017). The temporal perspective remains important as activities may precede or follow one another or be simultaneous.

In mechanisms identification, I applied a strategy of decomposing the phenomenon and localizing the mechanism within the system. The decomposition can be structural or functional, depending on whether it remained focused on component parts or component operations. Structural decomposition allows the system to be broken down into structural parts that perform the operations figuring in the functional decomposition. Functional decomposition consists of identifying the mechanism behaviour. For inquiring about every single mechanism, I conducted both kinds of decomposition (structural and functional) simultaneously. They passed through a period of coevolution during which the decompositions were repeatedly modified to become increasingly compatible (Bechtel and Abrahamsen, 2005). Yet, decomposition is not equal to a mechanism-based explanation. Once I identified the component parts and operations in mechanisms, a major part of the discovery process involved establishing linkages between these elements. General mechanisms are made visible through abstraction and analytical accentuation. Effective theorising is based on the prompt elimination of irrelevant factors and focuses on the central issue. I looked for regularity and predictability in cases to establish a link between self-regulation initiatives and other relevant elements and their characteristics. The following logic guided this analytical step: from the detection of common elements (patterns) and characteristics, through the identification of discriminatory features, to establishing the underlying mechanism(s). This step was necessary to conceptualize trajectories in terms of more abstract elements and eventually formulate the nonmarket mechanisms.

4.2.5. Description of mechanisms

The description of each mechanism reveals relevant component parts and operations, the organization of the parts and operations into a system, and how operations are orchestrated to produce the phenomenon (Bechtel and Abrahamsen, 2005). The figure below is a schematic visual representation of consecutive phases from mobilizing self-regulation to modification of the nonmarket environment. It serves as a model for further description of mechanisms.

Figure 16. Consecutive phases of nonmarket mechanism based on self-regulation



The abiding element of the model is the firm's self-regulation, which modifies the behaviour(s) of other actors(s). The mechanisms do not occur in a vacuum. Thus, the first element in the figure, as presented above, is related to the initial setting, including the set-up conditions (in which the self-regulation is operated) and the external activator (the situation imposed by other actors that makes a company mobilising self-regulation as a nonmarket strategy).

The compulsory component of the mechanism – a company as an entity plus self-regulation as action - constitutes the substance of alteration in the nonmarket

environment. A trigger is a phase when a company decides to leverage self-regulation.

Basically, a company needs to communicate its activities, unless there is no existing self-regulation regarding the issue. In such a situation, a snug-fitting self-regulation initiative can be put in place as a response to external pressure.

The mechanism in motion consists of a series of activities undertaken by different actors. This unfolding phase is indicated by the red element in the figure above. The nonmarket interactions between a company and its stakeholders, resulting from self-regulation mobilization, are considered in consecutive phase(s) of the mechanism in motion. Here, one would be interested in the interplay between different actors, their activities, and possible intermediary outcomes. The blue bottom circle in the figure represents possible output in the nonmarket environment, not necessarily expressed in terms of regulatory and/or normative outcomes.

4.2.6. Interrelating nonmarket mechanisms

This final research strategy stage aims at interrelating the identified mechanisms and answering the second research question: do some of these mechanisms intertwine with one another? In practice, at this research stage, I identified three nonmarket mechanisms. Further analyses consisted of exploring if they were interconnected and if yes how.

Although entities and activities are always equally important in that they must both be present to produce the phenomenon, their explanatory power is not the same. As it is noted, "in many dynamical systems (...) the entities are relatively similar to each other and the activities are vital to produce the phenomenon" (Illari and Williamson, 2012: 126). Components organisation, understood as whatever relations between the entities and activities, is an important characterisation of mechanism, as the same entities and activities organised differently will produce something different. In the mechanisms-based approach, the organisation gives the ongoing conditions that allow the component parts and operations to produce the phenomenon. Spatial and temporal organisation affects the mechanism (its type and functionality), while the operation of a mechanism might alter the organisational structure.

An additional element to the mechanism-based explanation may consist of identifying initial conditions and forces operating on those conditions to generate predictions of mechanism functioning. Thus, in the description, I tended to clarify the enabling conditions/drivers being a part of the context in which the mechanism functions. Consequently, while describing mechanisms, I included contextual elements considered highly important and informative (Bromiley and Johnson, 2005), such as set-up conditions and additional external pressure emerging afterwards, or characteristics of existing self-regulation practice. Further, following the description of each case, I preceded the analysis of the issue-settlement development over time. This required some degree of simplification, where only the factors like external pressure and corporate answer through the activation of a specific mechanism were considered. These elements are summarised in the figure below.

Figure 17. Mechanisms intertwining

Code	Domain / Company	Existing self-reg	Pressure			Mechanisms intertwining	Law	
			Initial	Additional	Ultimate			
1	FoW-A	Food waste / Auchan	Yes	Political		Regulatory threat	M1 → M3 + M2	
2	Don-A	Food donations / Auchan	Yes	Political	Social	Regulatory threat	M3 + M1 → M3	
3	Don-EL	Food donations / E.Leclerc	Yes	Political	Social	Regulatory threat	M1 + M2 → M3	
4	Pla-A	Plastic / Auchan	Yes	Social	Political	Regulatory threat	M1 → M2	
5	Pla-EL	Plastic / E.Leclerc	Yes	Social	Political	Regulatory threat	M1 → M2	
6	ReP-A	Recycled Packaging / Auchan	Yes	Social		Regulatory threat	M3 → M2	
7	OP-A	Overpackaging / Auchan	Yes	Social		∅	M1	
8	Che-A	Checkout / Auchan	∅	Political		Regulatory threat	→ M3	
9	Lab-EL	Labelling / E.Leclerc	∅	Political		∅	M1	
10	ReP-EL	Recycled Packaging / E.Leclerc	∅	Social		∅	M2	

→ answer to regulatory threat

The table presents the main characteristics of each case. In seven out of ten cases self-regulation existed already when the issue became salient. The initial pressure can be political or social and further escalation of pressure, through the addition of other types is possible. The colon representing mechanisms intertwining shows what mechanisms were activated by the company at some stage of the issue settlements, knowing that an arrow indicates the moment when a regulatory threat appeared. Interestingly, in all cases where the regulatory threat is present, the law was eventually voted and implemented, and thus the issue was regulated *in fine*.

Also, I analysed the trajectories while mobilizing the notion of the nonmarket problem life cycle (Bach, 2010) to understand the impact that a company can have over an issue and in which arena it is settled. Nonmarket issues development can go through several stages. It starts from the issue emergence or identification of the problem. In this first stage, a company looks for weak signals of rising societal and political issues. In the very beginning, issue saliency remains low and rises with time, as more stakeholders become interested in it. Stage two is characterised by media coverage of the issue and raising public awareness. A highly salient issue attracts the attention of different actors and results in forming of interest groups. When multiple actors are interested in the issue settlement an opportunity of forming alliances appears. Once the leading political jurisdictions (cities, countries, *etc.*) are keen on adopting relevant policies, the issue-settlement moves to the political arena, the consecutive stages are as follows: enacting legislation, administering it, and enforcing it. An additional stage may take the form of litigation over the issue. Overall, in the classic approach, the issue moves from the social arena to the political one, where the latter is composed of legislative and executive stages.

Figure 18. Stages of nonmarket issue lifecycle



Identification of different configurations of mechanisms leads to their integration into a synoptic model (presented further in section 5.2). Despite some degree of simplification, the model is intended to be judicious and properly depict real-world phenomena. The elements retained in the global model allow its modularity (for instance by adding new mechanisms or integrating other nonmarket strategies that activate the identified mechanisms), raising the model's predictability and adaptability to a new context (Illari and Williamson, 2012).

4.3. Quality of the research

Qualitative research and especially exploratory study may be criticised for lacking scientific rigour. To remove doubts and remain fully transparent on how the study was conducted the previous section presented in detail subsequent actions and all analytical steps conducted within the research programme.

Numerous ‘goodness criteria’ are mobilized for research quality assessment (Miles, Huberman and Saldaña, 2014) together with a wide variety of (sub-) categories relevant to the qualitative case study (Avenier and Thomas, 2015; McGinn, 2010; Tsang, 2014; Soparnot, 2019). Among various methods for case quality interpretation proposed by researchers, validity and reliability are the main concepts. While validity considers the extent to which the study produces results that correspond to real properties and characteristics of self-regulation phenomenon in the social world, reliability acknowledges the extent to which the results of the research can be reproduced when repeated under the same conditions. Indeed, a broad understanding of validity with multiple dimensions is applied in qualitative research (Maxwell, 1992) and refers to the confidence one can have in making certain conclusions.

However, the specificity of this research project, conducted as an exploratory case study with highly important contextual elements, results in the non-applicability of some types of validity. For instance, internal validity may be considered analogous to credibility, that is how research findings match reality. Nonetheless, evaluating internal validity, as reflecting relational, cause-and-effect conclusions from the results of the study, seems not consistent with the research design and mechanistic approach. The quality of mechanistic explanation depends on the correctness of the preconditions, the generality of the mechanisms, and the accuracy of the predictions (including those related to the mechanism per se) (Bromiley and Johnson, 2005). Thus, good explanations depend on several elements: (1) the preconditions must fit the facts, (2) the mechanism needs some generality, and (3) when combined with the preconditions, the mechanisms should make falsifiable predictions. It is also to note that predictions can include both the final topics of interest and a variety of intermediary observable features that the mechanism says should take certain values. Indeed, some normative constraints on good mechanistic explanations have been imposed. It means that explanatory texts, models, and representations should be judged by the extent to which they accurately and completely describe a relevant portion of the ontic structure of the world (van

Eck, 2015). Eventually, what counts is the explanatory power of models based on real-world mechanisms. Hereafter, the relevant categories evaluating the quality of the study are reviewed.

Construct validity

Evaluating if the phenomenon under study is accurately reflected in the research project remains the primary ‘validity’ question that has to be addressed in a qualitative study. The appropriate identification and categorization of the self-regulation phenomenon was a major challenge faced during data collection and preliminary analysis.

In an exploratory inductive case study, construct quality depends on whether a clear a priori specification of constructs – without specifying the relations between them – guides the study (Eisenhardt, 1989). On the other hand, a researcher ought to avoid any tendencies to essentialize words and categories, as “it is essential to explore what aspect of reality this word opens up and what a specific word allows a researcher to see, or what aspect of reality it refers to” (Reiter, 2013: 7). Consequently, I deliberately and intentionally did not refer to or used directly the concept of self-regulation in my investigation (for instance while conducting interviews). This explicit avoidance of the term “self-regulation” was offset by the use of the terms “voluntary engagement” or “voluntary commitment” referring to the activities undertaken by actors beyond their legal obligations³⁷. Different nomenclature was used by the participants for describing the phenomenon in the real world. Only afterwards, the activities and initiatives identified during the research were linked to the conceptual categories retained for the purpose of this study (for instance, self-regulation or early compliance). This allowed me to track the broader scope of projects without imposing pre-selection at the early stage of data collection and only afterwards juxtapose it with a legal framework when conducting data analysis.

Reliability

Assessing the reliability of research requires making judgements about its stability and consistency (Mills, Durepos, and Wiebe, 2010). The goal of reliability is to minimize bias and error in the collection and analysis of data. Judging a study as highly reliable means that the same results and conclusions would be reached if the research were conducted again. Exploratory research can achieve reliability when conducted in a structured, self-aware, and

³⁷ In French “des initiatives/engagements volontaires”.

transparent way. To guarantee the reliability of the study multiple provisions were undertaken while conducting the research in accordance with chosen exploratory and cumulative case design. Hereafter the main provision to ensure auditability are outlined.

First of all, in line with Yin's suggestions, a case study database was drawn from several sources of data (Yin, *op.cit.*), including archival records (administrative documents, formal studies on the retail sector, mass media articles, videos, etc.), interviews and my notes on the case study. This documentation remains specific and broad, as it covers a long span of time and multiple voluntary initiatives. It is stable in the sense that can be reviewed if required. In order to address the problem of biased selectivity, data triangulation was operated to improve internal consistency via multiple sources of evidence. All precautions in managing the database were undertaken - manual data inspection and counting, data screening and cleaning, if necessary, data duplication in digital formats and storage in a safe location (cloud and a few different devices).

Regarding interviews, for each interviewee, a document presenting a professional profile was established and a contact summary form was written after the conversation. I avoided leading questions even though interviews were targeted. My interlocutors provided explanations as well as personal views (perceptions, attitudes). However, sometimes, it was not possible to avoid bias regarding what the person was allowed to share or wished to share officially (some interviewees shared information but asked for keeping it confidential).

Next, a detailed data analysis process was established and elucidated. The procedures are clearly stated, following analytical steps explicitly and each research strategy stage is well documented (Dubé and Paré, 2003). I took field notes during all analytical processes and when relevant shared the details on data analysis techniques and tools (coding structure, visualisations of results). Moreover, the intermediary results, called "trajectories", are presented in the appendixes in order to facilitate the understanding of the final results.

External validity

External validity refers to generalizability, which is the ability to take the findings from one study and apply the same associations and conclusions to other populations. By its very nature case study is bounded in context, time, or population characteristics that define the range restriction, thus, statistical generalizability is not appropriately applied. Case studies allow generalizing to theory (instead of populations), what constitutes a type of external validity (Yin, *op. cit.*). The knowledge produced by case studies is generalized via abstraction.

Thus, analytical generalization is aimed at identifying the necessary theoretical links between two or more observable characteristics of the phenomena studied and specifying them in terms of a broader theoretical scheme.

This research is not expected to achieve significant possibilities of generalizability. The detailed explanations of interrelations between mechanisms' component parts and their contextualization are not considered a disadvantage, however, they limit the possibility of generalization from results. The particular nonmarket environment as a context of each situation requires nuanced investigation. The importance and specificity of the context in nonmarket strategy research significantly reduce the possibility of generalizability. However, analytical generalization, also known as 'transferability' (Maxwell, 2008), is largely possible from the generated research results that help to identify the role of self-regulation as a nonmarket strategy, its relation to other strategies and its utility in influencing the nonmarket environment.

Also, the nonmarket strategy mechanisms identified in the study can be subjected to inferential generalisation explained as generalising from the context of the research study itself to other settings or contexts (Ritchie and Lewis, 2003). Inferential generalisation is applied when findings from a case study can be applied to settings beyond the sampled one. This seems an appropriate manner of generalizing the results, given that self-regulation is a common phenomenon in contemporary business across different sectors and domains.

Instrument validity

In qualitative studies, the researcher is considered the primary instrument of data collection and analysis, as the person engages in the situation, plays a dynamic role in understanding the environment, and makes sense of the possible interpretations. Thus, in qualitative research, issues of instrument validity and reliability depend largely on the skills of the researcher. Gathering useful and exploitable information for the purpose of the study requires good familiarity with the phenomenon and the empirical setting. As mentioned in 3.1.1. section, my professional experience together with my multidisciplinary academic background were a substantial advantage while conducting the research. In the context of this study, the possible negative bias resulting from the researcher's (myself) positioning was reduced by the fact that I participated in specific training sessions on the following issues: research ethics, qualitative data collection, discussing research's setting and data interpretation.

Quality scientific research may be understood as a process, comprising several steps, that attempts to ensure the credibility, applicability, consistency, and neutrality of the results. Good quality research remains transparent and accountable. Moreover, it provides evidence that is robust, ethical, and can be used to inform practitioners. The quality of a research study is a key issue for scholars who engage in scientific dialogue with pairs. I believe that this chapter provided detailed and satisfactory explanations of the research design, data collection and analysis process.

Closure and Transition

This chapter outlines the process of data collection and analysis. They were conducted simultaneously, which is admitted in qualitative research. Multiple data sources were mobilized: interviews, internal documentation, press releases and press articles, legislative texts, grey literature, and website content, among others. Data was gathered on both the industry and corporate levels. Both data and methodological triangulations were carried out.

Providing mechanistic explanations involves finding and describing the phenomenon, together with the entities and activities, and their organization, by which the phenomenon is produced. It may also be enriched by the description of the context in which the phenomenon develops. In order to generate a successful mechanistic explanation, I developed a 6-stages research strategy. After a preliminary, contextual analysis of all data, I proceeded as follows:

- identified the self-regulation activities of selected companies in various domains,
- constructed visual representations of identified cases,
- analysed common and divergent characteristics to postulate mechanisms and provide their detailed description.

It allowed me to articulate research findings, that is (1) describing the production of self-regulation as a nonmarket strategy phenomenon in a distinctively mechanistic manner and then (2) building a model of interactions between nonmarket mechanisms.

The explanatory framework based on mechanisms is more realistic about the social order than the covering law model but is also more complex. The knowledge generated through the mechanism-based approach takes the form of models understood as representations, including diagrams and linguistic descriptions. As the results of the research, these elements are presented in detail in the following chapter.

PART 3 – RESEARCH FINDINGS

CHAPTER 5. RESEARCH RESULTS

The main objective of this thesis is to reveal how self-regulation impacts a firm's nonmarket environment *via* mechanisms operating in a business' political and social context. This chapter presents the results of the research and answers to the main research question, which is "How does self-regulation operate as a particular nonmarket strategy?" The exploration of nonmarket mechanisms based on self-regulation brings to light answers regarding the following sub-questions: What are the mechanisms through which Self-regulation operates in the nonmarket environment? Do some of these mechanisms intertwine with one another?

In a very general way, mechanistic explanation involves finding and describing the phenomenon of self-regulation as a nonmarket strategy, together with the entities, activities, and their organisation. The analysis of the ten cases allowed raising the level of abstraction and identifying three major nonmarket mechanisms – endorsing the voluntary commitment, transforming the geography of power, and shaping the regulation – further presented in the first section of this chapter. This first part focuses on each mechanism separately, providing detailed behavioural and mechanical descriptions. Further, to improve the information value of generated knowledge, the mechanism-based approach goes beyond situational description and simple characterisation of the relationship between component parts that are of interest. It addresses the problem of how the relationship and changes in the nonmarket environment are brought about. Understanding of interrelation between different mechanisms is crucial to answering the research questions. Thus, the main results take the form of self-regulation as a nonmarket strategy mechanistic model presented in the second section of this chapter.

The key elements of this chapter are exposed in consecutive sections:

- nonmarket mechanisms with their detailed description (5.1.), and
- the mechanism-based model of self-regulation as a nonmarket strategy (5.2.).

5.1. Nonmarket mechanisms based on self-regulation

In the previous section, the intermediary results were briefly discussed. They take the form of nonmarket interaction trajectories. The discovery process was based on reproductive reasoning between earlier research on nonmarket mechanisms and the findings of data analysis. Nevertheless, in this exploratory study, the proposed mechanisms provide the basis for future research.

According to the typical characteristics of identified trajectories when companies leveraged self-regulation to interact with their nonmarket environment, three generic mechanisms were identified:

- **Mechanism 1 – Endorsing the voluntary commitment,**
- **Mechanism 2 – Transforming the geography of power,**
- **Mechanism 3 – Shaping the regulation.**

These three mechanisms form an essential part of the explanation. Each mechanism targets a different element of the nonmarket environment, defined according to the (IA)³-Framework (Bach and Allen, 2010), that is actors, arenas or assets. The overview is presented in the table below.

Table 23. Mobilization of mechanisms regarding specific elements of the nonmarket environment

Mechanism		Actors	Arenas	Specific assets
M1	Endorsing the voluntary commitment	Stakeholders – nonmarket actors	Public sphere / Media	Enhanced public image and reputation
M2	Transforming the geography of power	Stakeholders engaged in a political bargain (market and nonmarket)	Political arena	Coalition
M3	Shaping the regulation	Policy decision-makers: legislators and executive authorities/agencies	Legislative and executive arenas	Access to policy decision-makers

Regarding the type of actors, Mechanism 1 tackles the general public and a broad category of stakeholders in the public sphere, Mechanism 2 - specific stakeholders being the actors engaged in political bargains on the issue, and Mechanism 3 - policy decision-makers, and regulatory institutions. Consequently, each mechanism unfolds in a different arena: social or

political, knowing that Mechanism 2 operated in a political arena perceived globally, whereas Mechanism 3 operates specifically in legislative and executive arenas (both being political *per se*). Also, through activating the nonmarket mechanisms, a company may acquire or reinforce its nonmarket assets, for instance, image and reputation, capacity to build interest groups, and access to policy decision-makers.

This section develops further on each mechanism by providing: a description of its functioning, contextual elements (set-up conditions and functioning conditions), and additional elements, for instance, potential outcome(s).

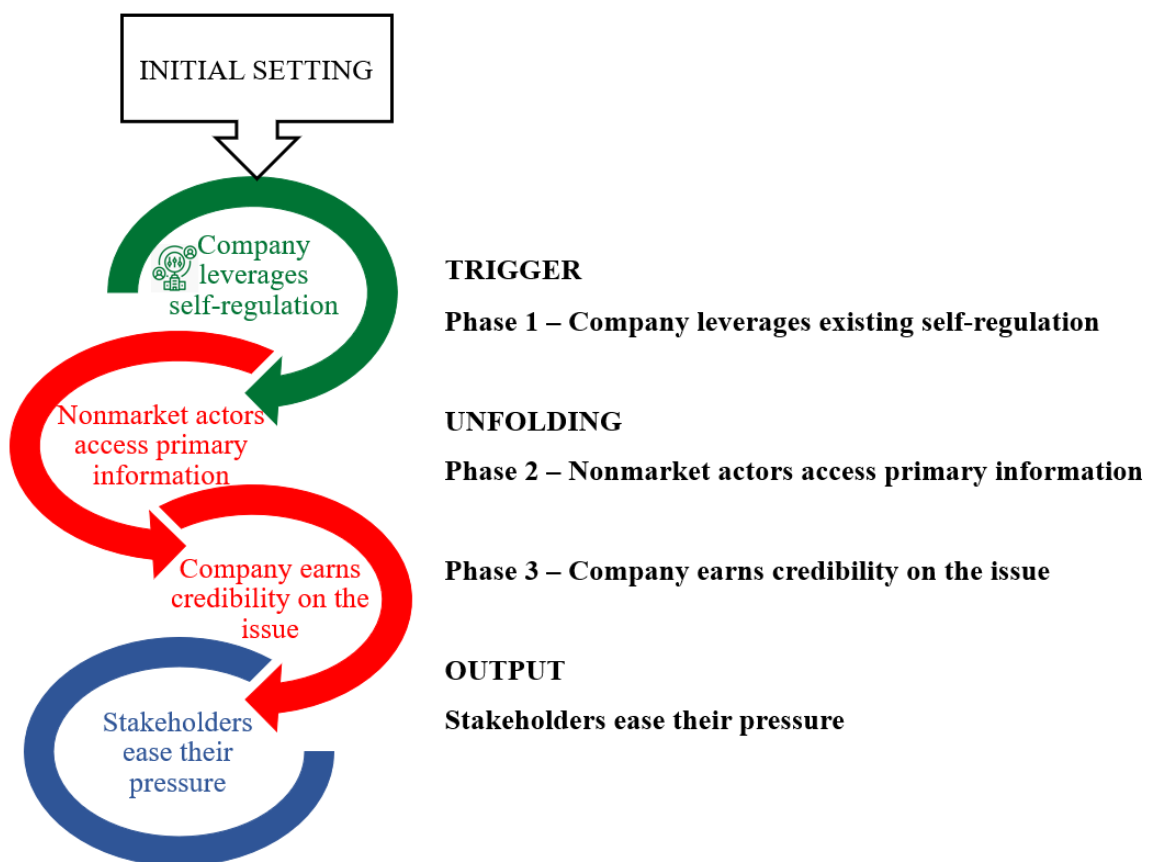
5.1.1. Mechanism 1 – Endorsing the voluntary commitment

Organisational and operational self-regulation are practices that are decided and implemented internally and, by default, remain “invisible” to stakeholders and the large public. Consequently, the stakeholders and the large public may simply overlook the voluntary actions and benefits of firms’ self-regulation.

The mechanism of endorsing the voluntary commitment refers to an evolution in the nonmarket environment resulting in stakeholders openly recognising and approving the voluntary activities undertaken by the company. An endorsement can be defined as the act of giving one’s approval or recommendation to something, usually in a public manner. To this end, the stakeholders must have access to comprehensive information on existing measures and subsequently assimilate the information to encourage their further support on the issue.

Hereafter a visual representation of the first mechanisms is presented, and its consecutive phases are discussed in detail afterwards.

Figure 19. “Endorsing the voluntary commitment” mechanism operating mode



Phase 1 – Company leverages existing self-regulation

This mechanism is triggered by a decision to communicate a voluntary commitment to the stakeholders in response to external pressure. The intended outcome in this phase is to inform them of the existence and results of undertaken self-regulatory initiative(s). Thus, a company needs to determine its communication strategy, including target audience(s), appropriate channels, and message to deliver.

(...) it's a permanent mission of raising awareness, gathering information and dissemination. And it's a virtuous circle that needs to be set up. (...) The question is how to pass on information regarding all the voluntary initiatives so that they can be constantly rebroadcast with a team effect. (...) There are shops which make progress on environmental issues on their own, they have already thought about this subject very carefully and have been implementing it for years. They don't necessarily communicate. They don't think about it [communicating], but they move forward with the issues. [A5]

If the initiative is promoted in the press, this is a way for me to capture the information as well. It's really an important subject for us to manage to capture what the shops do, because they have a certain autonomy, and we have a very large number of stores. [A10]

[shops do engage voluntarily]. It's very difficult to know because they don't spontaneously report information. When they do, it's usually because it's not going well and when there's a problem that they can't solve. When they have managed to find [a good solution or approach], sometimes they don't even communicate. [E2]

We also ask our regional referents to document actions that take place in shops and report them to us. We also monitor the press and the media to identify shops' initiatives. Because not all shops are used to or want to report their actions. (...) We organise [internal] competitions to get information back. From time to time, we send out the questionnaire to find out how shops progress on certain issues. [E1]

As demonstrated by the example of food retailers, typically in the franchised system but also within centralized organizations where stores have a certain level of autonomy, some self-regulatory initiatives are undertaken locally by individual shops. They remain invisible to the external stakeholders. But they may remain invisible even to members of the central office. Indeed, when most projects develop following the bottom-up logic, their initiators do not systematically advertise successful self-regulatory engagements.

In such a case, the first challenge is gathering the information and carrying out an inventory of completed projects, so the company can determine if they are compulsory from the legal point of view or can be qualified as self-regulation. It seems substantial that internal stakeholders, including the organisation's members on different hierarchical levels, and such

departments as Communication, Sustainability, or Public Affairs, stay aware of voluntary activities carried out by their collaborators. It conditions the ability of a company to advertise these activities further afterwards and manage the uptake on a national level.

This first phase is focused on demonstrating a self-regulatory engagement; thus, the channels of communication remain adapted for each targeted audience. Five categories of communication are identified, and various communication tools are assigned to each. The details on each type and some examples are presented in the table below. The examples are further discussed.

Table 24. Typology of communication used for information diffusion regarding the voluntary commitment

Examples of verbatims	Possible communication channels	Targeted audience	Communication type
<p><i>We use google+ to share good practices [in-house] and it works relatively well. We have a CSR group, a technical group, a CSR management google+ group and a technical google+ group. We regularly post initiatives, and concrete solutions, which are more or less duplicated... [A1]</i></p> <p><i>We issued a guidebook for shops, which allows them to secure regulatory aspects and also to propose innovative things. [E1]</i></p>	<p>Network of reference persons in regional structures or directly in stores</p> <p>Internal social network</p> <p>Policy guidelines</p>	<p>Employees</p>	<p>Internal communication</p>
<p><i>Explain to consumers [the principle of reusable bags]. So these are actions that are not considered general public communication, but rather targeted communication tools we provide to the shops, if they have questions from customers, for example. For our cashiers, we propose simplified language elements so that they [rise consumer awareness]. [E7]</i></p> <p><i>In general, each time one can find the point of sale displays (...) to animate the shop. It's true that there are a lot of in-store operations, so there's not much time in general for institutional messages. So many promotional operations are conducted that there is not much time to promote responsible practices. [E2]</i></p>	<p>Direct on-site communication between customers and staff</p> <p>Product packaging</p> <p>Social media</p> <p>Print Ads, point-of-sale displays</p>	<p>Customers</p>	<p>Customer communication</p>
<p><i>Environmental fairs [organized by] stores located in shopping malls. It has been agreed between Auchan and Ceetrus, the owner, that we can exhibit to the customers of the hypermarkets, what we do in terms of waste management. To show them everything they do and everything we do. [A5]</i></p>	<p>Events and thematic days</p> <p>MOOC</p>	<p>The general public (laypersons)</p>	<p>Public awareness campaigns</p>

Examples of verbatims	Possible communication channels	Targeted audience	Communication type
<p><i>Interact with the institutional ecosystem (...) to enhance the institutional image. How can we show our good practices, what the company can do proactively, to be valued in this environment which is not only political [A10]</i></p> <p><i>We are going to have rather institutional communication with press releases intended for specialised newspapers, and we will undoubtedly send elements to the deputies. (...) Our communication, it's not going to be a poster in every shop. It will reach people who are specialised in the subject - politicians or journalists. [A1]</i></p>	<p>Official press releases</p> <p>Extra-financial / annual reports</p> <p>Company website(s) / blog/ emails/ newsletters/</p> <p>Partnerships with higher education institutions</p>	<p>Investors, financial institutions, rating agencies</p> <p>Business partners</p> <p>Experts</p> <p>Activists / NGOs</p> <p>Journalists</p> <p>Policy-makers</p>	<p>Public relations</p>
<p><i>We set up a national program so that each time a shop inaugurates the initiative [on the local level], it has a communication kit with the messages to be passed onto its political contacts and an invitation to the local press so that the local press takes up this initiative and diffuse the information. [A10]</i></p> <p><i>We also communicate on this [Facebook] page about our environmental actions and now more broadly about the shop's CSR approach [A9]</i></p> <p><i>It's true [communication] is rather diverse and it's related to the fact that merchants don't like to do what others have already done. All the big brands are involved in all the important [societal issues]. But still, in terms of visibility, some will target [specific issues]. (...) So yes, there is a kind of differentiation through communication on CSR. [S3]</i></p> <p><i>(...) when we really want to communicate something, we speak out nationally, in the press, on TV, and in the media. [E2]</i></p>	<p>TV/online commercials or news</p> <p>Local media (TV, radio)</p> <p>Specialized magazines</p> <p>Newspapers</p> <p>Social media, blogs, Internet</p>	<p>Society</p> <p>Communities</p> <p>Experts</p>	<p>Media communication</p>

First of all, internal communication allows for keeping employees informed of the general policy of the company and the initiatives undertaken in different locations. It aims to share good practices and develop a more consistent level of engagement among all shops.

Further, customer communication focuses on conveying a specific message related to the customers' attitudes towards the company (its engagements) and their own "responsible" behaviour. It makes clients feel concerned about the issues at stake.

The first concern of the retail sector, highly challenging, is "how can I promote what I do to help my client reduce their own impact?" That's obvious. For a long, long time, retailers have had an attitude of communicating, "I do this, I do that". In fact, I think that today the consumer demand integrated by retailers is more about "demonstrating how buying such a product from them helps their customers to be better in their concerns about environmental impacts". [S3]

A public awareness campaign is a marketing effort to build public recognition of a problem through different communication tactics. These campaigns target a large number of people, they consist of explaining issues and disseminating knowledge to motivate the public to take action. Retailers have a "responsibility in terms of the evolution of the consumption model. (...) beyond the traditional emphasis on price, they can make consumers aware of the socio-economic impact of the products they buy" [A3] and play a role in modifying consumer behaviour.

The concept of public relations refers to communication focused on building and maintaining long-term, trusting relationships with key stakeholders, including nonmarket actors such as experts, journalists, activists, and policy decision-makers. Companies differentiate "lobbying from positive communications" [A10], as the former is focused on political decision-makers and the latter covers a broader scope of stakeholders.

General media communication covers information dissemination through various channels of mass media (TV, radio, newspapers) and social media, in addition to specialized magazines, blogs, etc. It targets the public and communities principally but remains a valuable source of information for other stakeholders (employees, associations, policy decision-makers or experts). Moreover, media communication turns out to be a tool to mobilize the staff or partners on specific issues. Indeed, it is admitted that a company may use "communication (...) to make the actions in the shops almost compulsory" [E2]. Once the voluntary commitment is broadcasted nationally in the media, all shop managers are expected to comply with the announced engagement and follow the head office's policy directions.

Finally, the message content is scrutinised. A company can emphasize several factors in its communication, such as commitment to a cause, its impact on the cause, and the congruity between the cause and the company's business. The communication on food donations is an accurate example, as companies point out the three abovementioned aspects of their policies.

Communication on voluntary engagements typically focuses on a company's involvement in causes easily perceptible to audiences. Organizations tend to promote projects that are visible at a glance and readily understandable by their targets.

(...) installation of photovoltaic shelters is highly visible; it immediately gives the store a good image. [E2]

The subject of food waste is much more tangible and meaningful for society than other environmental subjects, such as greenhouse gas emissions and loss of biodiversity.

To see bins overflowing with products that are still consumable (...) is even more damaging to the reputation of the company than knowing that it has emitted x thousands of tons of CO2 since it is even more concrete as an indicator. [C3]

The main aim of informing on voluntary commitments is to convince the audience of substantial self-regulation and proof the credibility of engagement. Thus, if possible, a message needs to include reliable information and be accurate, based on facts and tangible results. "The primary concern is that the information is reliable and [secondly] representative" [A1]. For instance, companies are ready to exclude from the scope of their extra-financial reporting the indicators hard to verify or those not representatives of most of their facilities. On the other hand, the modification of scopes from one year to another or the transformation of the reporting system makes it impossible to follow the progress on a specific issue, making the reports less reliable.

To sum up, this first phase of the "endorsing the voluntary commitment" mechanism is focused on information dissemination to different actors. The main objective is to make them aware of the existence of voluntary commitment regarding specific issues at stake.

Phase 2 – Nonmarket actors access the primary information

The company is a unique and primary source of information regarding its self-regulation. Once the company diffuses information on an initiative, it changes the information available in the system and opens new opportunities for dialogue with other actors. In addition, the information continues to circulate in the system, often independently from the company. Overall, a reduced informational asymmetry between the organization and its stakeholders allows for changing their perception of issues at stake.

Previously, five main types of communication used by retailers were exposed. However, the boundary between different types of communication and their impact on stakeholders, who can receive information simultaneously from different channels, remains thin and sometimes blurred. Promoting an “institutional message” regarding responsible practices is not always compatible with the expectations of customers, as demonstrated by the example of E.Leclerc in Templeuve. The store developed a complete advertisement system for environmental initiatives (posters, leaflets, stands, website, etc.). The global awareness campaign entitled “I save my planet” (in French *J'économise ma planète*) aimed to show the impact of food products on global warming while providing customers with the keys to act. Even though the campaign was judged satisfactory, the retailer “has stopped communicating in shops (...) [because despite] an interest in ecology among the people, customers [did not] ask for such information when shopping” [E6].

Also, the dissemination of information in the system favours the use of informal communication channels by stakeholders. In addition to company-controlled communication channels, external communicators not entirely supervised by the company exist and play a significant role in information diffusion on firms' voluntary commitment. Actually, in this second phase, the nonmarket actors who access the primary information may further transfer it to other stakeholders and, at the same time, in turn, influence its content. Thus, the role of these intermediaries shall not be neglected by companies.

Stakeholders, who become a secondary source of information, can be classified into two types (1) opinion leaders, such as the specialised press, think tanks, or NGOs, and (2) the general public, such as consumers and local communities. Mobilization of employees and consumers, as companies' advocates or ambassadors, is pulled by the concern of transparency. But overall, opinion leaders are privileged to transmit information to a broader

audience and are often proactive in seeking information on a company. However, they are a more discerning public who remain critical. As far as opinion leader audiences are concerned, transferring reliable information, for instance, to an NGO, allows the company to be challenged on its practice by an external organization.

The various NGOs (...) with whom we exchanged - to tell them what we do and also to ask them to support us in certain sustainable development actions. [The dialogue is established] to challenge our sustainable development policy and enrich it... being fed by NGOs that better detect weak signals. [E1]

If self-regulation is judged satisfactory by the association, the company can earn an additional advantage - the support of an independent actor and its input to improve a voluntary practice.

It is assumed that a nonmarket actor who gains access to primary information previously unavailable would modify its behaviour and possibly take a nonmarket action as a consequence of acquiring new knowledge. It is further explained in the consecutive phase.

Phase 3 – Company earns credibility on the issue

When a nonmarket issue arises, the aim of demonstrating self-regulatory engagement is to convince the audience of virtuous practices implemented by the company as a response to the issue. If a company gains credibility on an issue, defined as the quality of being trusted by other nonmarket actors, it is better positioned to influence an issue settlement. Establishing credibility makes other actors respect the company and vouch for its commitments. Through additional support given by other nonmarket actors (*e.g.*, media, employees, customers, monitoring groups, consumer forums/blogs), the company can position itself as the one who has a solution to an issue.

A company may argue for it in a few manners to gain credibility on the issue. It communicates on already undertaken voluntary engagements to demonstrate that the social or political expectations regarding the company's behaviour on the issue, as presented in the public debate, are irrelevant or do not relate to the organisation in question.

First, the information provided to stakeholders proves that their demand is already (totally or at least largely) satisfied through self-regulation, even though they were unaware of that. The company demonstrates its achievements to date, highlighting that the results are

obtained thanks to the internal willingness and voluntary engagement and not under the pressure of external forces. For instance, when consecutive laws introduced a ban on single-use plastic bags, E.Leclerc largely presented itself as a ‘pioneer’ company for withdrawing single-use plastic bags. In 2016, a media campaign (in journals and on billboards) directly tackled the Ministry of Ecology to remind them that it has been over twenty years that E.Leclerc engaged on the issue.

Yes, Mrs Royal, it was in 1996 and we had already stopped distributing shopping bags. On July 1st, 2016, twenty years later, your law will ban single-use plastic bags (...) A law, 20 years later? Why not, it's never too late to do the right thing! [E.Leclerc - Media campaign, June 2016]

What helps the company to reinforce its trustworthy image is when the ground-breaking attitude is also recognized by its competitors, associations, or journalists.

E.Leclerc has helped the large-scale distribution sector to separate itself from single-use bags, and in a broader sense, has even contributed to the abandonment of single-use bags a few years ago. I admit it is also thanks to E.Leclerc that we abandoned the bags. [A5]

[Auchan] like most others and following the lead of Leclerc - anticipated the legislation. We started in 2002 and we no longer offer free plastic bags. [Lionel Perrone, the manager of the Auchan store in Tours-Nord [Press Review, Feb, 2016 – La Nouvelle République du Centre Ouest]

Indeed, self-regulatory activities are considered more credible when advertised by a neutral source. Thus, seeking external certifications (like Auchan’s hypermarket in Le Mans, having been certified ISO14001 since 1999 for over 20 years) or third-party evaluation of commitments is a common practice.

Companies tend to demonstrate their commitments, which preceded the legislative obligations. Regarding environmental issues, and especially waste prevention and management, it is often the case that projects are driven primarily by economic benefits. Thus, a company does not await to be under the pressure of nonmarket forces to engage in operational self-regulation initiatives.

The company did not wait for the law or for various government initiatives to fight against food waste, which, beyond the ethical and social issue it represents, is economic nonsense for the shops Thus, for many years the E. Leclerc stores, aware of their responsibility, have been taking preventive action by improving stock management, working on product recovery, donation, and the elimination of unavoidable waste by choosing the solution that will have the least impact on the environment. [E.Leclerc – website, 2016]

Secondly, a company needs to follow general societal tendencies to remain credible on the issue. The issue of food donations has been for a long time treated as a societal one and advertised among the charitable actions of retailers. It is mainly due to the use of the tax lever of the Coluche Law to promote food donations as a solution to poverty and malnutrition. When political and social concerns moved from food aid to food waste, companies adapted their arguments to align with social expectations and to appear more reliable. The table below shows two types of arguments mobilized regarding food donations.

Table 25. Variations in the issue framing of donations

Charity framing	<p><i>Auchan's ambition has always been to promote quality, healthy and balanced food, accessible to all, in a spirit of social responsibility. The fight against food waste remains an integral part of this ambition. [Auchan, press release, 2013]</i></p> <p><i>We have the sponsorship branch, which also manages all sponsorship actions such as (...) food banks for waste. [E5]</i></p>
Anti-food waste framing	<p><i>Well, the [unsold products] donations we make to associations is an environmental approach for me, it is really linked because we give to avoid throwing away. [A9]</i></p> <p><i>I went with a shop manager so that he could really talk about the way the donation was organised and in parallel how we fought against food waste in general. Because, of course, there is a donation, but it's still a waste. Donation for retailers is a way of dealing with waste, but it is not a way of eliminating waste. [A8]</i></p> <p><i>Retailers are already quite exemplary in their fight against food waste. [Interview of M-E. Leclerc – Radio Europe 1, Aug 27th, 2015]</i></p>

However, it may be observed that the way of thinking about food donations differs between actors. In the department of Loiret, a journalist contacted different retailers to get information about their food donations. A local E.Leclerc refused to communicate on the issue, arguing that “the stores’ general policy is not to communicate on humanitarian or charitable actions”. The reply can be considered surprising, knowing that all competitors except one were fully transparent regarding their food donation practices. Nevertheless, it shows that in 2017, over a year after the Garot Law entered into force, the food donations were still considered by this manager as confidential charity policy rather than anti-food waste

action worth being publicized. Nevertheless, since 2013 (the signature of the anti-food waste pact), a general switch in retailers' public discourse on food donations has been observed.

Box 1. Adapting self-regulation to societal tendencies

At the beginning of the 2000s, most environmental impact analyses focused on the footprint expressed in the emission of CO₂ equivalent. Consequently, this approach biased directions that were given to various corporate policies in the following years. A tendency for modification of "issue framing" to earn credibility can be observed as the primary concern of policymakers has moved from greenhouse gas emissions to multi-factor environmental assessment. A decade after, new social and political concerns emerged, and companies were expected to completely switch their practices by finding alternative solutions to old problems.

Example: How can the choice of political priorities in terms of environmental policy bias voluntary actions of corporate packaging policy?

Ten years ago, at the beginning of the 2010s, glass was actually considered to be very heavy. So, ten years ago, the debate was more about reducing greenhouse gases and (...) we changed glass packaging for plastic packaging. In fact, it allowed having one tonne less cargo in the lorry and that made sense. We said, "this switch saves a certain amount of carbon emissions per year". And so we worked on reducing greenhouse gases. Well, today, in fact, we're adopting the opposite system. Because in fact, we are facing the opposite expectations and public authorities give the opposite direction. At the time, we were focused on limiting greenhouse gases and today we live in a non-plastic world. Indeed, plastic is less recyclable than glass, and so the question arises of returning to glass packaging. It's an issue that we have been working on for a very long time but with a different perspective. [E7]

Thirdly, while remaining focused on earning credibility through advertising self-regulation, a company has to watch out for potential backfires. As demonstrated above, for a long time, donations were seen more in terms of charity than anti-waste policy. E.Leclerc, took precautions to ensure that the communication strategy would not backfire. They dread the issue, knowing that advertising donations as a solution to food waste would attract stakeholders' attention, which was considered harmful for the stores. Food waste was "a bad topic" [E6], and companies worked to lower the risk of "talking about de-consumption" [E6]. Also, for the representatives of the Auchan group framing donations as a food waste issue was considered a trap in corporate communication. "Food waste is a subject on which it is dangerous to communicate because if we say that we are going to set objectives on food

waste, we acknowledge our share of responsibility.” [A3]. On different occasions, Auchan underlined that wasting food or throwing away products was nonsense for retailers. From an economic point of view, donations as a solution for food waste recovery only allowed for limiting the losses.

Further analysis shows how the behaviour of stakeholders changes once the company earns credibility among nonmarket actors. It provides examples of how other actors may express recognition of retailers’ efforts resulting from self-regulatory initiatives. First, the employees are believed to be more performant while working on meaningful projects. Thus, involving them in sustainability initiatives reinforces their engagement. Also, voluntary commitments may result in a reorganization of the internal structures of companies. It is then essential to align the interests of all internal stakeholders. For instance, retailers develop support teams specialized by domain and product category to put in place, carry out and evaluate sustainability projects. Their role is to innovate for operational efficiency while moving beyond legal obligations.

Previously, retailers only bought and sold (...) Now there exist quality, R&D, and environmental divisions - teams with great technical knowledge. Others are envious of them, in the industry or the ministry. They often consult us because they know that we have very meticulous teams, including experts on packaging, environmental issues, sustainable development, and quality, (...) often specialized by product category. [S2]

Results show that the effectiveness of self-regulation and retailers’ internal expertise is recognised by the policymakers who explicitly solicit economic actors for their feedback regarding issues at stake and possibly on draft legislation. Further, NGOs or consumer groups who carry out regular analyses and benchmark products can alert to product quality or ingredient irregularities. On the other hand, their rankings are also a form of acknowledgement given to producers who put effort into providing the best quality products and services through their self-regulatory practices. Thus, it is a form of advertisement by a third party, reinforcing the company's credibility. Finally, consumers convinced of virtuous corporate behaviour can compensate the company *via* the market (by the purchase of products/services, their loyalty to the brand), but also through their advocacy which is considered one of the essential assets in the nonmarket environment.

Potential outcome(s)

The mechanism of “endorsing the voluntary commitment” can be behaviourally described as changing the company's perception by other actors and stakeholders. It develops in the following manner: a company demonstrates its initiative among stakeholders and provides them with primary information regarding its voluntary engagement, while in turn, the transparency and effectiveness of self-regulation allow stakeholders to endorse the company.

The activator of the mobilization of self-regulation as a nonmarket strategy always remains an external force. Thus, the primary outcome of activating this first mechanism is eroded external pressure due to response (and satisfaction) given to social or political demands - the mobilisation of self-regulation results in easing external pressure and supports the constituency-building strategy.

The main political resources acquired through this first mechanism are expertise recognized by other actors, enhanced public image and reputation with political actors. After all, the objective of communication regarding voluntary engagement is to enhance the brand's image and reputation. Companies constantly seek the licence to operate, and voluntary commitment “has become a privileged communication axis because it is good for the group's image and promotes its environmental or social actions.” [Press review – “RSE. Où en est la distribution ?”, *Points de Vente*, February 2013]. Indeed, the only constraint the companies have in not fulfilling their voluntary commitments “is in terms of social perception and brand image.” [C4]. Thus, only substantial Self-regulation that is effective in the eyes of stakeholders can ensure the proper functioning of this mechanism. Symbolic and ineffective self-regulation risks provoking a wave of accusations of greenwashing and damaging the company's image.

The expected dominant effect of demonstrating voluntary commitment is to gain credibility among other market and nonmarket actors. It remains a valuable nonmarket asset, and a company that is credible in the eyes of stakeholders can more easily influence its business environment. Self-regulation allows entering into relations with the various market and nonmarket actors; thus, the value of self-regulation as a nonmarket strategy lies in its optimal communication aimed at mobilising other actors alongside the company. The ability of stakeholders to engage in collective action and work together on solutions remains

insufficient to transform the economic model into a sustainable one. Voluntary engagement “is exactly what will enable confidence and effective implementation [of policies]” [C4].

Leveraging self-regulation can be helpful to act upon the issue saliency and to modify other actors’ issue perception, which in turn impacts their willingness to engage in the issue settlement. The table below summarises the potential outcomes of mobilising self-regulation regarding the issue at stake.

Table 26. Potential outcomes of mobilising self-regulation regarding the issue at stake

Potential outcomes	Description
Preventing the occurrence of a widely salient issue	Weak signals are not transformed in nonmarket issue
Neutralising the issue	Existing nonmarket issue is no longer considered relevant
Reducing issue saliency	Existing nonmarket issue becomes secondary
Modifying issue perception by other actors	Nonmarket issue is framed in an alternative manner
Introducing alternative issue	New nonmarket issue is raised in political debate

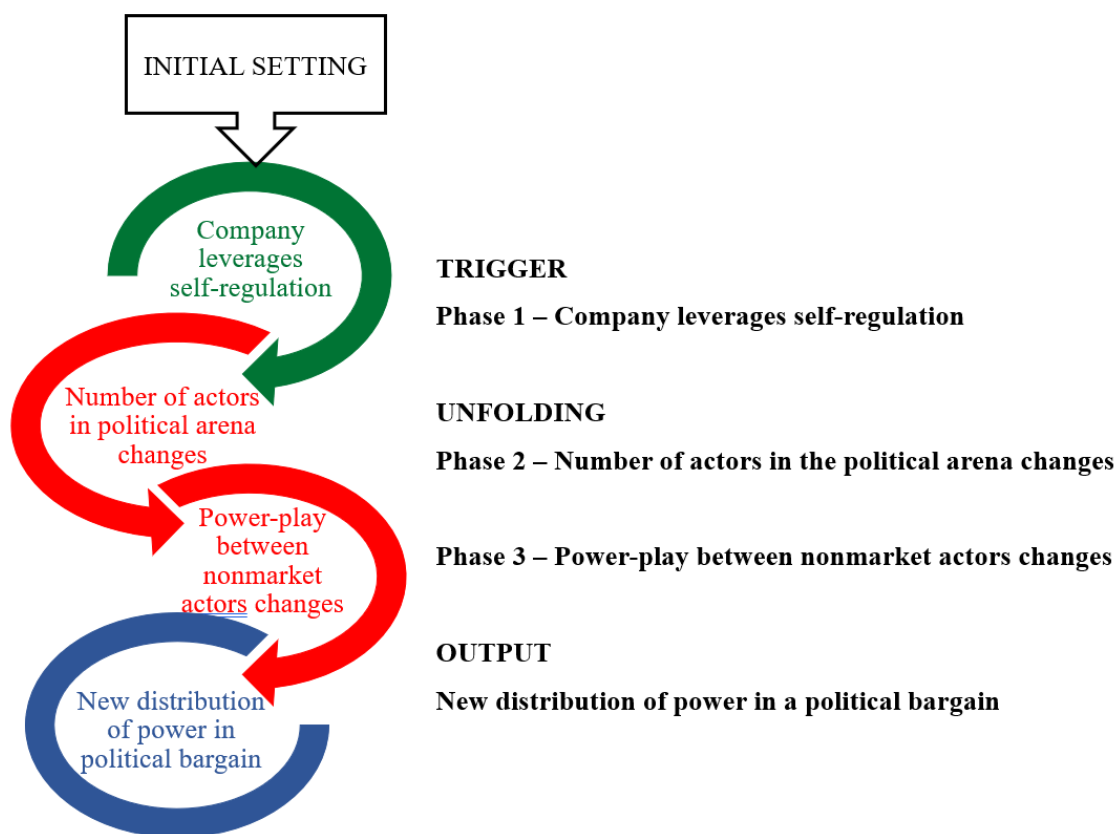
To sum up, the first mechanism named “endorsing the voluntary commitment”, is tightly linked to information diffusion on the voluntary initiative and its promotion by a company. It unfolds *via* communication in three consecutive phases: (1) company leverages existing self-regulation, (2) nonmarket actors access the primary information, (3) company earns credibility on the issue. Activating this mechanism allows a company to act upon issue perception and its relevance in public debate. Various nonmarket actors play an active role in unfolding the mechanism, including the media, the public, activists and NGOs, experts, journalists, and policymakers, among others. The company’s objective is to demonstrate its commitment and earn credibility among those actors regarding its self-regulatory practice, so the external pressure diminishes. However, activating this mechanism has no direct impact on the regulatory outcome.

5.1.2. Mechanism 2 – Transforming the geography of power

The second mechanism operates directly in the political arena, as the nonmarket issue is advanced in its lifecycle and reached the phase of the political bargain between interest groups. Leveraging self-regulation allows a company to operate a political repositioning and transform the distribution of power between nonmarket actors in the political arena. It impacts the three elements regarding the nonmarket environment: the number of actors engaged in the issue, their typology and their position.

Hereafter a visual representation of the second mechanism is presented, and consecutive phases are discussed in detail.

Figure 20. “Transforming the geography of power” mechanisms operating mode



Phase 1 – Company mobilises self-regulation

This mechanism is triggered by a decision to mobilise self-regulation engagement in the political arena. The analysis shows that the company may demonstrate the existing self-

regulation (example of case 4 - Pla-A) or launch a new “tailor-made” self-regulation initiative in response to external pressure (example of case 9 - Lab-EL). Meaningful navigation in the political arena requires an understanding of the issue, its impact on own business and possible externalities, and most importantly – the positioning of other actors and concerns about the issue. Before choosing the lobbying strategy to apply in the political bargain, the company evaluates what advantage can be drawn from its self-regulation.

As demonstrated by the Foodwatch public campaign's example denouncing potentially dangerous substances in food (see Box 2), the commitment to use recycled materials in packaging may provoke sanitary risks. This negative externality of switching to secondary materials was previously omitted and compromised companies in the retail sector. Therefore, it is essential to consider all aspects of implemented projects and consequently engage in issue-setting actors that may have been previously disregarded.

Box 2. Recycled packaging versus Food safety

In 2015, an NGO Foodwatch alerted authorities and public opinion to the presence of aromatic hydrocarbon mineral oils (also known as MOH) in food products of various retailers. It was due to direct contact of food with recycled cardboard packaging. Consecutive analyses confirmed the risk for a large number of products of different brands and from several European countries.

In response to the external pressure (name-and-shame campaign) and in absence of existing legislation, the French retailers who were pointed out, including E.Leclerc and Auchan, but also Lidl and Carrefour, decided to satisfy the NGO's demand and set up action plans to replace the potentially dangerous packaging of their products. In addition to a simple modification of packaging specifications, other voluntary actions were undertaken to deal with the issue, including:

- Conducting alternative analysis in independent laboratories and modification of control protocol in their quality process,
- Participating in collective action on a sectoral level (The Federation of Commerce and Distribution, The National Association of Food Industries),
- Negotiating with suppliers and partners in other sectors regarding the quality of recycled packaging, use of printing inks, specification for glues, etc.,
- Requesting the European authorities to legislate on the subject (judging that legal and scientific paradigms were poorly defined).

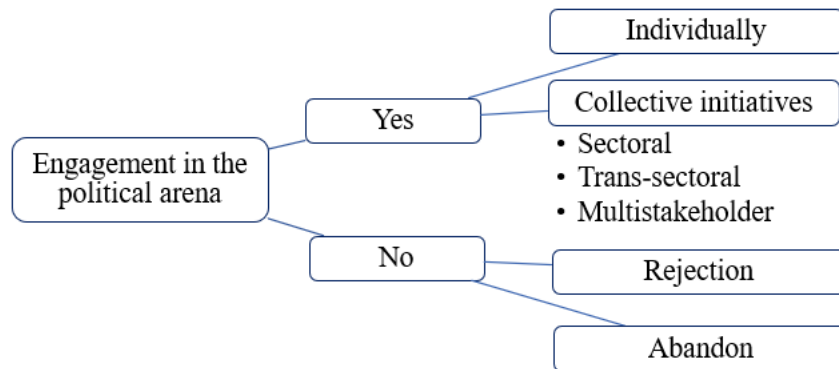
Most of these actions were launched in 2016 and 2017. It is only in 2022 that the EU established the thresholds of MOH presence detectable in food, but they remain not compulsory, each member country has to pass its own legislation. In France, the Circular Economy Law introduced a gradual ban on the use of mineral oils on packaging and printings. At the beginning of 2022, the public consultation regarding executive acts had a place and the executive decree was issued in April 2022. The law enters into force at the beginning of 2023. The NGO continues to claim zero tolerance.

Phase 2 – Number of actors in the political arena changes

The second phase is focused on changing (increasing or reducing) the number of politically engaged actors on the issue. Different paths may lead to its modification. New actors can enter the arena, which raises the number of entities participating in a political bargain. A company may work to “bring” new players with two objectives, either to launch a collective action or to reject their responsibility on them. However, the most dynamic changes are observed when alliances are founded - alignment between a company and other existing actors or alliance with actors considered “opponents”. Last, existing actors can simply leave the arena and withdraw from a political bargain.

The number of actors active in the political arena depends on the political strategy of each nonmarket actor engaged in a bargain on the issue. The figure below resumes the possibilities open to a company (or other political actors) regarding the strategy of engagement in the direct political bargain.

Figure 21. Decision-making tree regarding the organization’s engagement in the political arena



First of all, an entity decides whether engage directly in a political bargain or not. Thus, it can conduct an individual or collective initiative. Both types are not mutually exclusive, however, companies may decide to follow one of them to limit the costs of political action. A classic type of collective action is sectoral lobbying when a company aligns with its competitors to defend a common interest. The company may engage in a collective action indirectly through, for instance, trade associations. Trans-sectoral political action can be carried out by bringing together various partners in the value chain. A multistakeholder initiative is defined as one exercised by an interest group composed of actors from different categories, for instance, companies and civil society organisations. The analysis shows that

companies in the food retail sector are likely to engage in collective action (both trans-sectoral and multistakeholder forms of lobbying) regarding universal societal issues, like the fight against plastic pollution.

Based on its self-regulatory experience, a company may decide not to lobby. The company may have already satisfied a “future” prescription depending on the draft legislation content. Thus, the legislation would not impact the daily operations, and the company has no interest in lobbying. A specific form of “no lobbying” is rejection, a situation when a company denies responsibility and points to other entities that the new legal obligation should cover.

The table below resumes how each type of political engagement strategy may impact the number of actors present in the political arena.

Table 27. Modification of the number of actors in the political arena depending on the company's political engagement strategy

Decision	Examples of verbatims	Number of actors in the political arena
Individual action	<p><i>There is total autonomy for companies, members of the FCD, in any case, if they wish to act independently and differentiate themselves [S1]</i></p>	+ 1 (the organisation in question)
Collective action	<p><i>We [FCD members] were not dealing with ultra-competitive issues. Rather, we had in mind to work together [A8]</i></p> <p><i>We have been very much in the wake of the FCD. We have not tried to differentiate ourselves. We felt that the FCD represented our interests well regarding these subjects. [A10]</i></p> <p><i>Auchan, like a certain number of our competitors in the retail sector, is a member of the Perifem association (...) via Perifem, we are informed on new regulatory subjects that may come up, we are in touch with the directorates and with the ministries on the forthcoming texts, either before they are consulted or in the consultation sessions.[A6]</i></p> <p><i>The founder of the company [TooGoodToGo – a service provider] has succeeded in mobilising a community, mobilising resources, and assets (...) Finally, she federates other actors [including retailers]. (...) and she has found, it seems to me, a good model. [E6]</i></p>	Reduced, depending on the coalition
Rejection	<p><i>We have carried out many communication actions saying "yes, we waste, but we waste less than the industry, we waste less than the consumer". [A3]</i></p>	Increased (new actors engage)
Abandon	<p><i>But that was also the sense of history. I remember very well when the subject came up. In the beginning, together with my boss, we participated in a few meetings at the National Assembly. We were told, "In fact, this ban on plastic bags is the way the story goes. So, either you completely embark on this issue for all your stores, or you oppose yourself. But at the end of the day, we will end up banning single-use bags. So, it's up to you to get on board or to resist". So, we had chosen for the supermarkets to commit ourselves and go along with the law and not fight against it. [A10]</i></p>	- 1 (the organisation in question)

Once the nonmarket issue reaches high saliency and advances in its lifecycle, it moves to the political arena. It can be brought about by stakeholders participating in the political bargain. Also, those who find their interest in lobbying on the issue can enter the political arena ultimately. A myriad of actors is engaged in an issue-setting, including the market (competitors, service providers, direct suppliers, companies in the value chain or branch) and nonmarket ones (activists, NGOs, think tanks, experts, sectoral federations, local authorities).

Collective lobbying is usually carried out at the sectoral level. Working out a unified position starts with sharing self-regulatory experience and good practices with competitors through representative sectoral associations. Companies “interact within the [sectoral association] to bring inputs in the elaboration of the [joint] position. Then, the federation brings them to the interlocutors.” [A10]. Typically, the sectoral associations (as is the case of Perifem and FCD for retailers in France) are “always informed well in advance, monitor the legal texts” [A4]. Thus, they can ask members for information on specific subjects and gather the return of experience based on self-regulatory practice from multiple actors to build a common approach. A lobbying coalition may be built with stakeholders other than competitors, including companies from the value chain, whole branch (trans-sectoral), or civil society representatives (multistakeholder). If multiple actors share a common vision, as is the case of signatories of the Plastic Pact, an issue settlement can occur within a specific “model bringing together three types of actors: policy decision-makers, NGOs and companies” [C4].

It is to note that a collective approach may also be encouraged by two aspects. Firstly, the public authorities prefer to deal with the sectoral representatives, not each company separately. Secondly, companies in the retail sector have to manage a reputational commons problem, especially when societal issues are at stake.

I think you have to be part of the common movement, which is very often sponsored by politicians. I think we have to get involved (...) That is to say that when the public authorities wish to reach the sector as a whole, they will go through the FCD. [A10]

It's clear that, in general, all large-scale distribution is lumped together. So, in fact, people don't necessarily distinguish between E.Leclerc, Auchan, Carrefour, Intermarché, etc. When there is something wrong, a brand that does something wrong, people will confuse everything and lump everyone together. That's for sure. [A9]

However, the decision to participate in collective lobbying does not mean that company deprives itself of influence over the issue.

We were auditioned for the Garot Law. We were indeed heard at the National Assembly. In parallel, we also had meetings with the FCD to coordinate all our efforts. [A8]

Indeed, retailers mind their capacity “to stand out, to be positively positioned in relation to our competitors... [as] voluntary engagement is a tool for differentiation and for promoting the brand.” [A10].

The geography of the political arena may be modified by the arrival of new players. A company may deliberately work on bringing in new political actors, either by encouraging the engagement of its partners or by distancing itself from the problem and putting the blame on other organizations. For instance, as long as the plastic policy is concerned, Auchan took an approach of creating dedicated circular ecosystems together with its suppliers (TT Plast or Roxane) and leaving them an active role in the political bargains. Consequently, it adopted a specific lobbying strategy: fundamentally opposed to the total prohibition of plastic, the retailer emphasised that recycled plastic benefits from a more favourable environmental footprint than some other virgin materials. However, the company renounced lobbying against the ban on the use of plastic bags or other items. Finally, the restrictions on plastic bags were introduced gradually, partially as a result of a major lobbying campaign carried out by representatives of the plastic industry. For instance, Martin Tarrach, Managing Director of TT Plast was very active in the political arena in 2015 regarding the ban on plastic bags (see box below).

Box 3. Extract from an article illustrating the political activity of Auchan’s supplier TT Plast

When Pierre Moscovici came to visit TT Plast in February 2014, the Minister of the Economy that he was, praised for the approach taken (...) in partnership with the Auchan group. More recently, Martin Tarrach was invited to give his testimony at Bercy during the presentation of an experimental agreement to accelerate the recycling of plastics [and also] at the Circular Economy Conference in Paris. Even more surprisingly, Ségolène Royal had announced a visit on 22 May (...)

“We are asked, at the global level, to do the circular economy. I recover waste at the source, I recycle, and I make reusable products. I’m even ready to give a hand to the new Minister of Labour to reduce unemployment with the extension project.” [Mr Tarrach says] (...)

Since he became aware of the preliminary decree [resulting from the law banning plastic bags], the director of TT Plast has written an argument on the public consultation site, written to Manuel Valls, been received by a representative of Emmanuel Macron at Bercy, and spoken to the Ministry of Ecology, without really being sure of the fate of his products in France. The leader is not laying down his arms. Believing that the draft text is contrary in several respects to the 2015 European directive on reducing the consumption of lightweight plastic bags, he warns: “I am ready to go very far legally. I cannot accept such inconsistency”. Martin Tarrach refers in particular to a discriminatory measure, pointing out that primary plastic packaging, for example for fruit and vegetables, would remain permitted for a time since it is excluded from the definition of a carrier bag.

[Source: Un exemple à ne plus suivre?, *Nord Éclair*, September 2015]

So far, examples leading to an increase in the number of participants have been presented. However, the political landscape also changes when the number of political actors drops. Choosing to abandon lobbying is fraught with consequences, as the company takes the position in retreat, without having certainty of the outcome of the issue settlement. The research findings show that at least two different reasons can push companies to abandon lobbying. The radically divergent arguments have been used by Auchan to justify their withdrawal from lobbying on two different issues. The first situation (see the verbatim illustrating “Abandon” category in Table 27) is characterised by the initial setting where strong political will is coupled with sincere conviction by the retailer that it should change its practice. In addition, a major part of stores had already put in place a self-regulation policy regarding the issue (ban on free plastic bags), so the stakes were relatively low regarding the legislative impact. The abandonment of lobbying was internally motivated by the significant positive results of existing Self-regulation and the willingness to make corporate policy coherent in all types of stores. An opposite explanation is given regarding the legislation on compulsory unpacking platforms (see Box 4 below). Based on a voluntary pilot project that turned out to be a complete flop, Auchan has abandoned lobbying against a compulsory collection of over-packaging at the checkout, while assuming that it would not obey the law. Later on, when another legislative text repeated the obligation, the issue was considered less important than the other issues under negotiations and abandoned again.

Box 4. Abandon lobbying against unpacking platforms

The compulsory collection of over-packaging at the checkout, for stores with a sales area over 2500m², was introduced by Grenelle 2 Law on 1 July 2011. At the beginning of the 2010s, following the international benchmark, Auchan has been testing unpacking platforms in 11 of its shops for over a year. The results were disappointing, and the company abandoned the creation of dedicated zones, despite the legal obligation.

We were alerted by German customers, who are used to having collection points in their supermarkets. In these [eleven] shops, the new collection has hardly taken off. (...) Customers are satisfied with this new service, but in the end, they use it very little. Only the plastics wrapped around the six-pack of water or the cardboard boxes of toothpaste are left more frequently. We wait for the decree to be published and we will generalise the take-back point in our 118 shops when the time comes [Yves Massart, Auchan's environmental manager – Press review – March 2011, Recyclage Récupération].

The regulation was not implemented by most retailers for practical reasons, and more precisely “incompatibility between local practice [sorting system] coupled with operational constraint and the law, which is voted at the national level” [A5]. However, no sanctions have been taken by the public authorities. A decade later, when the Circular Economy Law (in French Loi AGEC) has been proceeded the issue came up again and Auchan’s position, together with its competitors, was to resign themselves to the repetition of a provision in another legislative act. The company did not wish to lobby against this regulation, knowing that anyway it would continue to not be respected once the law enters into force.

While proceeding the law [on the circular economy] that issue has not been seriously re-examined. The issue was to collect [waste from customers] at the checkout. The subject has been already ten years old. It has been put in place on a trial basis by some shops - Super U, if I remember well. It was a bit of a fad because everyone was looking for sustainable solutions. And finally, the government said, "if two or three shops can do it, it should be done by everyone". There was a bill at the beginning, that all food stores of more than 2500m² had to implement this system. I was completely opposed to this and I still am. [Unpacking platforms] are places that do not fulfil their role, the customer doesn't understand its function. The idea was to make them aware of the need to buy less over-packaging, etc. (...) In the end, the shop had to sort it out afterwards. It's also a question of safety (...) Finally, what we recovered as cardboard or plastic was not the cardboard and plastic that we sorted in the shop. It was not the same treatment channel. We couldn't put the customer's cardboard in the shop's bin because it wasn't the same cardboard, it wasn't the same quality, and it wasn't the same destination.

This was really a subject that came up again with the circular economy law. They want to impose it for sales areas of over 400 m². And in terms of lobbying, there were so many aspects of this law that the lobbyists put pressure on certain subjects that were really very important, and we let others pass. We can't put energy into everything - we know it doesn't work; it won't be implemented. Retailers let it go because there's too much at stake on other subjects. It won't work anyway. [A6]

The second phase of transforming the geography of power mechanism relates to the number of actors engaged in the political arena. However, the distribution of power and capability to impact the legislation is not directly correlated to a simple arithmetic calculation of a number of players. The use of Self-regulation as a nonmarket strategy is aimed at changing the balance of power between players.

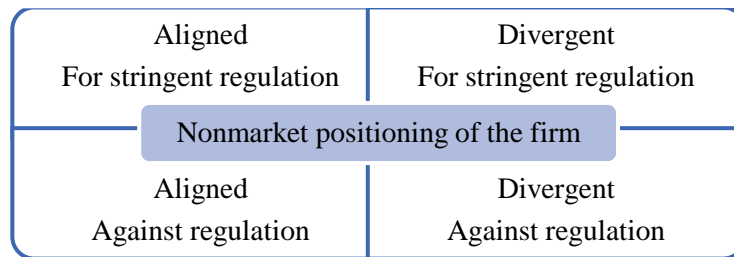
Phase 3 – Power-play between political actors evolves

The degree of influence that a company may exercise on policy decision-makers depends on a number of actors and their positioning in the political arena. Theoretically, the more actors engaged, the less power they have individually. However, they can build coalitions and ad-hoc alliances to gain more power over their opponents. Thus, it is necessary to understand how Self-regulation may impact the potential presence and positioning of various stakeholders actively engaged in a political bargain.

The basic vision of business-government relations is dualistic, where the economic actors would lobby against binding legislation, as policy decision-makers are supposed to act in the public interest. However, companies may lobby for the regulation for various reasons or decide not to lobby. Also, policy decision-makers do not necessarily have the same, homogenous vision of the issue and may remain in opposition from one to another. Further, new entities entering the political arena can align their interest with a company or become its opponents. If they share the same position, a company may either gain additional players supporting individually the same position or develop an alliance and launch a collective lobbying strategy.

The power play between nonmarket actors will vary according to their identity and positioning on the issue. Regarding one's position, four stances taken by other stakeholders can be identified, as indicated in the figure below. The four stances result from the combination of the position adopted according to two axes: aligned-divergent and stringent-against regulation.

Figure 22. Four possibilities of nonmarket positioning of other political actors according to the firm's bargain objective



Consequently, regarding a bargain position presented by a company, other political players can position themselves as:

- ally for more stringent regulation,
- ally against regulation,
- opponent for more stringent regulation,
- opponent against regulation.

The interest of mobilizing self-regulation as a nonmarket strategy is to make other actors adjust their position to be “as favourable as possible” from the company’s point of view. It means to seek alliances, for or against the regulation, according to the firm’s political objective. Further, the actors' identity and positioning are reviewed according to the research results.

The political bargain in the food industry has been for a long time dominated by manufacturers detaining the most popular brands. Nevertheless, it changes due to the macro-economic factors: “The lobbying power of the brands is globally superior to that of the retailers; however, the latter have the massive argument of their status as employers of a large number of low-skilled employees. (...) The outcome of the parties' struggle for influence over the state authorities is therefore uncertain (...)” [Press review – “L'anticipation, après l'orage; Négociations 2016”, *Points de Vente*, May 2016]. The variations in power-play during the yearly commercial negotiations spill over the bargain on nonmarket issues. Undoubtedly, economic actors, other than direct competitors, play an important role in the nonmarket issue-settlement.

Retailers enjoy influence over their value chain and when changing their own practice through self-regulation, they induce directly or indirectly the necessary adjustment on their suppliers. For instance, voluntary initiatives in terms of eco-design and commitments

regarding the limitation of overpackaging are much easier to implement on own-brand products. However, in a case when the production of private labels is outsourced, the self-regulatory decision made up by a retailer has consequences for the manufacturer.

We have our own brands (...) we can also have a knock-on effect on the whole market. Because in the specifications that we make for our plastic bottles, we can ask [manufacturers to modify the packaging] (...) we have the capacity to induce change via our private labels. [A10]

We have a role to play [regarding] our suppliers. Ask that packaging become more and more virtuous, more and more recyclable, notably by demanding that sorting disruptors, such as black packaging, are eliminated. This should no longer exist because we know that it is a sorting disrupter. So, we just want to encourage suppliers to do it themselves. [E5]

You have to influence your suppliers so that they accept to take into account not only the constraints of their production process and expectations of their value chain but of another actor in the value chain, the retailer [... but] It is not their problem. It is necessary to manage to influence the suppliers. [S3]

Indeed, an additional regulatory burden put on a purchaser (a retailer) further reverberates on its business partners. For instance, Auchan is subjected to Law 2017-399 on the duty of care of parent companies and contractors adopted in France in 2017. The commitments and the principles resulting from "soft law" became a law on the national level and ricochet, in all the countries where the subsidiaries and subcontractors of the company are located. As a consequence, while anticipating changes resulting indirectly from the new regulation, a company in the value chain may decide to become proactive on a nonmarket issue. The nonmarket position of firms being a part of the company's ecosystem is likely to be aligned with the retailer, regardless of the regulatory content.

The following example demonstrates how trans-sectoral alliances can be created based on the example of Self-regulation on the product packaging. Pushed by the social pressure to limit the presence of dangerous substances in recycled cardboard packaging, retailers found themselves in the middle of a scandal. They committed to rapidly replacing the defective packaging and have implemented a range of solutions, including negotiations with suppliers but it turned out that their voluntary engagement required a change in the entire production process. As the National Food, Environment and Labour Safety Agency pointed out, the issue's resolution laid in the hands of magazine and newspaper publishers and other advertising media printers, together with companies specialising in paper recycling. Finding a systemic solution required the involvement of companies that supply recyclers with used paper for further processing, as well as producers of printing inks, coating and glues. The

political bargain on the issue was focused on executive acts and unexpectedly, besides the FCD in the name of the retail sector, press publishers, printers, printing ink manufacturers, and the paper and cardboard packaging sector, the representants of the following sectors participated in public consultations: manufacturers of hygiene and cleaning products, electronic and communication equipment industries, plastic, energy and petroleum. All these actors were aligned to claim less stringent regulation. Foodwatch, the association at the origins of the issue, that committed itself to giving it high saliency and conducting political actions on the EU level, did not contribute to the public consultations regarding French executive acts.

In some cases, it is found that service providers lobby for stringent regulation. A regulatory threat is beneficial to develop activity, as they can offer higher added value for the companies they collaborate with. Foo-tech start-ups, like Phenix or TooGoodToGo, are very active in the social and political sphere on issues linked to food waste. Actually, their business models are built on the principle of the marketplace and benefit from various regulatory and fiscal leverages.

In 2014, we decided to reorient ourselves toward BtoB. Retailers and industry can no longer get rid of their unsold goods for free. We offer them an alternative service, which allows them to give it to associations. And we take a commission based on the volumes that pass through our platform. (...) We aim to become the marketplace for waste. And there is waste in all sectors... All of them are destined to be integrated into a circular economy. [Jean Moreau, founder of Phenix – Press review, Madame Figaro, Sept, 27th, 2019]

A company called Phenix has positioned itself precisely in the accompaniment of large-scale distribution, precisely in managing food waste principally aimed at donation, because it is paid on the basis of [retailer's] tax exemption. In fact, these companies, in their support of the large-scale distribution, try to ensure greater tax exemption, precisely in order to gain the highest percentage of success fees. And so, it is very dynamic, with a very strong sales force. It supports many shops that I have been able to observe. These shops had been involved in partnerships with small associations for years and years. In fact, the partnerships were called into question as soon as [Phenix] intervened, because Phenix had its catalogue of associations with which it had been able to establish partnerships. (...) I give you an example of a store that was working with a small association, but as a result, was not necessarily well organised, so [the store] had transferred all this food waste to this small association. It called on Phoenix, which has a much more technical approach and has made it possible to have a higher quantity of products to donate. And so instead of referring [the donations] to this small association which was not registered in [Phenix's] catalogue, it referred it to another organization. [N2]

This interesting example illustrates a situation when, due to the highly efficient self-regulation, social actors switch alliances from the position of “divergent/for stringent

regulation” to “aligned/against regulation”, as happened during the political bargain on the legislation regarding compulsory food donations (ultimately called the Garot Law). In the beginning, food aid associations supported the idea of the introduction of compulsory food donations, expecting that it would increase their volume. However, the efficiency of voluntary actions undertaken against food waste by food retailers (alternative to donations, for instance, dynamic shelf life or product transformation), resulted in a deterioration in the quality of donations. Thus, NGOs risked finding themselves with more volumes of foodstuff but of inferior quality. In the end, the associations supported the companies demanding regulation only in terms of signing donation agreements, and against an obligation of donating.

Overall, NGOs became key players in the issue-setting, often pushing policy decision-makers for taking up self-regulatory initiatives and transforming them into legal obligations. As far as environmental policy is concerned, “NGOs claim ambitious goals (...) while the balance of power is less between distributors and manufacturers and more between companies and NGOs. In order to reach a balance and common understanding. (...) everyone is able, at least behind closed doors, to understand what the state of the collective ambition is” [C4]. A will to establish partnerships with NGOs, often considered opponents per se, is commonly expressed by retailers. The company’s efforts and undertaken voluntary activities are aimed at transforming the usually conflictual relationship with the associations into a potential long-term cooperation.

[a will to] expand the company's projections on all the stakeholders. So, if we dig into the subject of sustainable development, in particular, the relationships with industrial federations, think tanks and foresight specialists, research organisations, start-ups, etc., this led me to meet players who could possibly support Auchan in sustainable development, CSR, waste, etc. Rather than competing on the issues, we possibly envisage potential collaborations and partnerships. [A10]

We set up a panel of stakeholders with the various NGOs (...) with whom we exchanged to tell them what we do and also to ask them to support us in certain sustainable development actions. This panel was created to challenge our sustainable development policy and enrich it... being fed by NGOs that better detect weak signals. [E1]

Thus, by engaging social partners in self-regulation, a company makes them jointly responsible for the achieved results and guarantees their favour in the issue-settlement. Self-regulation is an ideal tool to reverse the logic of opposition into cooperation. Consequently, when the issue at stake is discussed in the political arena, a company can count on support from the collaborating activists.

Usually, multiple actors from different backgrounds (both market and nonmarket environments) take part in a political bargain. They can decide to pursue political activity individually and/or collectively. A company leverages Self-regulation to reinforce its own position throughout the modification of the issue-settlement landscape.

Potential outcome(s)

The mechanism of “transforming the geography of power” can be behaviourally described as the one changing the political power balance between actors engaged in the issue-settlement. It develops in the following manner: a company mobilized an existing self-regulatory initiative or launches a new one as a response to a social and political demand. The voluntary commitment helps a company to modify the number of entities present in the political arena. As a consequence, it changes the power balance, according to their typology and positioning on the issue.

Mobilizing self-regulation in a political bargain is aimed at the creation of new distribution of power, more advantageous for the company. A political bargain result depends on all of the different groups and individuals that move advocacy forward. Self-regulation, when substantial and implemented in partnership with stakeholders, has an important impact on coalition building and political alliances. Thus, a main potential outcome of the second mechanism is the modification of a map of power, where increased own influence is accompanied by the transition of other actors to the category of most influential and strongly supportive in terms of the company’s objective.

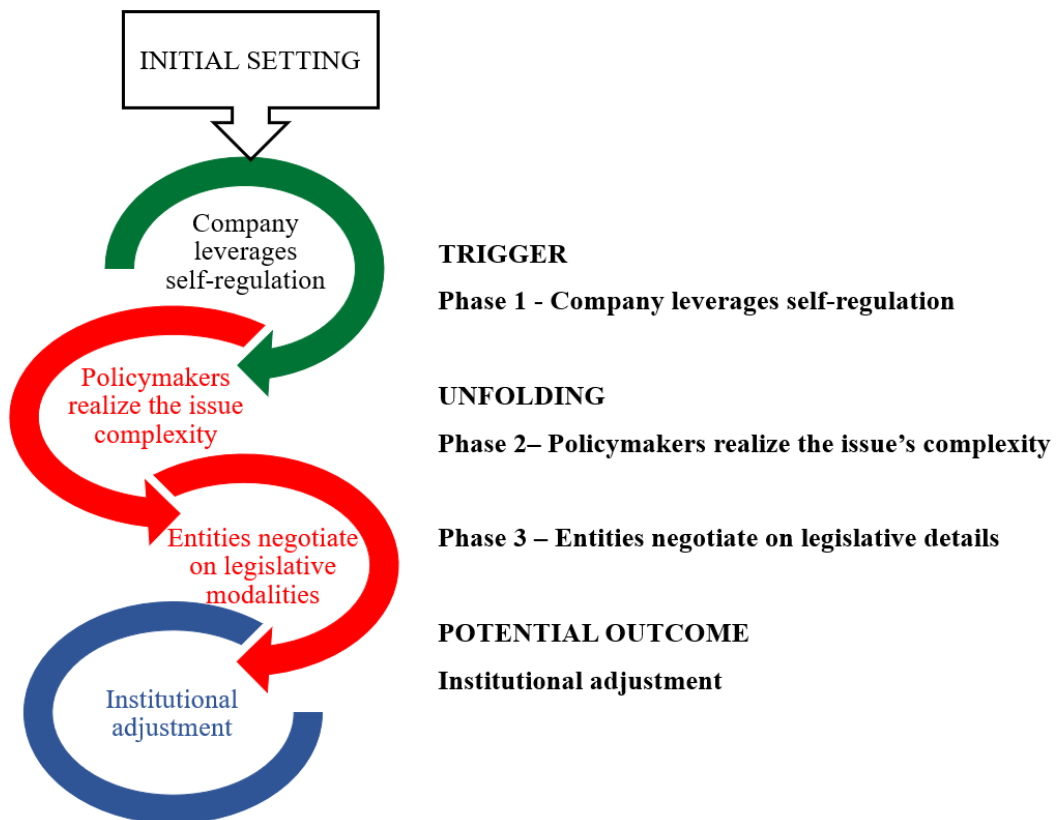
To sum up, the second mechanism relies on self-regulation as a tool to change nonmarket actors’ engagement in the political bargain and positioning. It unfolds *via* inter-organisational relationships in three consecutive phases: (1) company leverages self-regulation, (2) number of actors in the political arena changes, which results in the (3) evolution of power-play between political actors. If self-regulation results in common benefits, other actors considering the issue at stake may align with the company and support its position. In such a case, the objective of mobilising self-regulation as a nonmarket strategy is to build a strong coalition while limiting the number of opponents. On the other hand, self-regulation can be used as an argument for abandoning direct engagement in the political bargain, if the consequences of potential regulation are judged not worth the effort to engage in political action.

5.1.3. Mechanism 3 – Shaping the regulation

The mobilization of self-regulation may bring multiple outcomes in the nonmarket environment. The third mechanism focuses explicitly on the legislative outcome, that is the content of new legislation on the issue. The two entities participating in the unfolding of the mechanisms are the company and policy decision-makers. The company aims at challenging the regulation and influencing its content through direct engagement in the political arena.

Hereafter a visual representation of the second mechanism is presented, and consecutive phases are discussed in detail.

Figure 23. “Shaping the regulation” mechanism operating mode



Phase 1 – Company leverages self-regulation

A voluntary commitment is an excellent means to gain a return on experience in various business-related topics having an impact on business operations but not considered essential to its development. While improving its own performance by engaging in self-regulation, the company has the opportunity to test different approaches and solutions, adapted to its

individual business environment. At the same time, when the company finds itself under regulatory threat, the voluntarily implemented projects become a valuable experience that can pay off in a bargain with the policy decision-makers. Thus, the company positions itself as an expert and brings noteworthy arguments into a political debate. Also, it may decide to directly question the proposal to promote an alternative to the regulatory solution. The situation is mentioned in Section 5.1.2. when a company broadly agrees with the draft law and decides to remain passive is not further discussed here, as it results in the firm's withdrawal from the political arena.

An essential element of the nonmarket strategy operating through the third mechanism is the ability to accurately assess the advantages and disadvantages of the proposed legal solutions, knowing how the new legislation would specifically affect the company's operations. Self-regulation on the issue at stake is key to positioning the company in the issue-setting. For example, in 2015, E.Leclerc announced its engagement to stop the distribution of advertising magazines and leaflets proved to be a bad idea for the retailer. The financial losses of the shops that carried out the pilot project turned out too great concerning the benefits of reducing the use of paper.

Michel-Edouard Leclerc had announced in 2015, a little bit early, that we would go towards zero leaflets in 2020. This would have meant a big saving in paper. We quickly realised that it was too early. The shops that had done tests were losing a lot of turnovers. The customer was still too used to having a leaflet. Having said that, with the development and growth of digital, applications, etc., I think that we could make the same announcement again, but perhaps in 2025, 2026, 2027. [EL5]

Consequently, the company realised that this was not the right time to introduce a zero-paper marketing policy, bearing in mind that one day it might nevertheless prove effective. This is how Self-regulation can contribute to a better understanding of the potential regulatory outcomes.

If a company decides to question the proposal, it can act on two elements, that is its content and implementation schedule. Regarding the core of regulation, a company would try to influence the details of prescriptions and modify them either in a sense of the obligation of means, or an obligation of results. In such a case, Self-regulation provides reliable issue-specific information in political debate and reinforces the impact of arguments transmitted to policy decision-makers. Moreover, it gives feedback on “real” business operations and difficulties encountered “regarding the costs, operational and safety constraints” [A4].

Without overtly opposing itself to the legislation, a company can negotiate the following details: a reference point, the scope of applicability, technical details, specifications, thresholds, transition periods in its implementation, etc.

The self-regulatory experience allows companies to take political action aimed at promoting an alternative solution to the one integrated into the draft legislation. Self-regulation is believed to pre-empt regulation. However, the results show that voluntary commitment is often mobilised as a response to political pressure or regulatory threat. One of the features to consider is the (non-)existence of self-regulation before launching a political action. If such engagement is not implemented in advance, Self-regulation can be explicitly designed to counterbalance the regulatory efforts of public authorities. Under specific conditions, engaging in the voluntary initiative can result in the purposeful creation of an alternative solution to the one proposed by policymakers. The example of E.Leclerc attempts for introducing responsible labelling shows that it is possible to establish an alternative normative institution that would function in parallel to other schemes. Moreover, their approach to officially instituting a new logo through market relations (recognition by the suppliers and clients) reinforces the impact also in the nonmarket environment.

A complexification of existing institutional solutions is partially aimed at rendering the potential regulation useless. Demonstrating the results achieved by Self-regulation can serve to expose the misunderstanding of the problem and the inadequacy of the proposed regulatory solution. Indeed, regarding the implementation of unpacking platforms at the checkout, it was observed that despite the will to act upon the issue, the company's engagement does not bring the expected results. Thus, a company claims that regulation would not bring the results either because it's necessary to act through other means, for instance, developing projects to raise consumer awareness. A company may also introduce a substitute issue to distract attention from the current discussion and shift the focus to other entities, as was the case with the regulatory demand on consumption dates launched in parallel to a signature of the voluntary agreement on donations.

Phase 2 – Policymakers realise the issue's complexity

The results demonstrate that policy decision-makers seek voluntarily the expertise that economic actors can offer regarding environmental issues. Also, the executive agency ADEME plays an important role in conducting pilot projects and recruiting voluntary

companies to test and measure the impact of various solutions. While the regulatory framework regarding environmental issues has significantly evolved over the last decade, professionals admit that the retail sector had previously played a pioneering role as it was granted the possibility to assess diverse solutions while “everything was possible with the less demanding regulations” [C1]. Following the Grenelle 2 Law, multiple voluntary projects have been launched, and retailers were open to experimental logic encouraged by the authorities.

The operational translation of the legislative provision relating to the experimentation of the Grenelle 2 Law (...) consists of leaving the initiative to the economic players in order to identify the opportunities and constraints that environmental information can generate and to define the optimal conditions for its implementation. That is experimental logic [of policymakers]. [FCD]

The need for reliable information can be used by companies to their own advantage. As demonstrated through the example of legislation regarding food donations, the policymakers have shown different attitudes towards companies, as demonstrated in the table below.

Table 28. Policymakers’ attitudes towards private companies in the legislative process

The retail sector treated as	Verbatims
Easy victim of the anti-food waste policy	<i>The law and policymakers, broadly speaking... They tackled the simplest thing. Basically, [Garrot MP] said that “food waste” is generated by the supermarkets that put bleach on unsold food so that people can't get it back. There is a part of truth in this image, I have to admit. But [blaming food retail] was the easiest way. And then, when you tackle the end of the food chain, it's easier to act, than when you go upstream. [A10]</i>
Expert on the issue able to compare multiple solutions	<i>We were auditioned for the Garot Law. (...) We were indeed heard at the National Assembly. I went with a shop manager so that he could really talk about the way the donation was organized and in parallel how we fought against food waste in general. Because, of course, there is a donation, but it's still a waste. Donation for retailers is a way of dealing with waste, but it is not a way of eliminating waste. So, he explained how they manage product shelf life, and how they adapt their reordering. Even if, thanks to the automatization of replenishment policy, they were extremely vigilant in making sure that sales coincided with the following orders. So, all this was explained during this hearing. [A8]</i>
Whistle-blower on ineffective incentive-based approach	<i>The independent stores had an interest in this [food donation] tax credit. The policy decision-makers said "yes, indeed, we need to find another system of compensation to encourage those who have already optimised corporate tax to have an interest in donating", hence the obligations on information diffusion as companies are required to publish results on their level of waste. [E7]</i>

Firstly, the retailers were tackled for their unsustainable practices, whereas in fact, the sector is not the one directly responsible for most of the food waste. Further, during preliminary work to draft legislation, multiple companies could share their return on experience, however, some prominent people known for their commitments to sustainable retail were completely ignored during the hearings for the Garot report. The objective was to overcome the reductionist approach that limited the anti-food waste policy to the issue of donations. Last but not least, the policymakers were willing to collect testimonies regarding the efficacy of existing regulations.

Also, regarding the zero-plastic policy, it is recognized that the objectives fixed by the policymakers are disconnected from the technical capacities of companies to satisfy the demand for waste treatment.

(...) There are those who have rushed into the bamboo market - spoons, forks, bamboo plates - saying "it's compostable, it's recyclable, it's great". But no, there is no waste treatment chain for bamboo. [Company X and Y] have bought thousands of tons of bamboo. And then they were surprised, they got angry at Véolia claiming "recycle my bamboo". But it doesn't work like that. Because Veolia says it's hard, you have to grind it up, there is no bamboo treatment industry. In order to limit one waste, the government has opened the door to other waste. It's a simple transfer. [A4]

Waste prevention and management are highly complex issues and neglecting the search for systemic solutions results in compulsory rules that are not viable. That is the case of unpacking platforms to fight overpackaging or general principles for eradicating plastic.

Moreover, the retailers point out the inconsistencies of policies at the national and local levels, which effectively limits the introduction of uniform and durable solutions. Thus, Self-regulation allows calling attention to the fact that the proposed solutions should consider the diverse organization of retail chains, the character of the stores, their location, and the level of maturity to deal with the issue.

There are big companies that make these very ambitious commitments. But that doesn't mean that everyone can do it, not everyone has the means to do so. (...) One shall not believe that the objective is to generalise a practice to everyone, that it can be immediately put into a universal law. (...) There are other [economic actors] who need much more time for implementation because they are less mature on the issue. On the one hand, the law can help to force them, but on the other hand, it can also be too early. It shall be done gradually because even if there is an environmental emergency, there is also time for the decision to be made in the company, and time for the implementation and adaptation of the different production chains. [S1]

The second phase of the “shaping the regulation” mechanism results in changing the way politicians perceive the nonmarket issue and thus the potential methods envisaged for dealing with it.

Phase 3 – Entities negotiate on legislative details

The third phase of the “shaping the regulation” mechanism covers the exchanges between an organization engaged in lobbying and the policymakers who are targeted. The negotiation can take place in multiple contexts and through various channels, i.e. parliamentary hearings, public contributions, unofficial meetings, *etc.* It allows obstructing more stringent public policies from emerging but not necessarily pre-empting the regulation. Indeed, once the nonmarket issue is advanced in its lifecycle, there is little chance for the policy decision-maker to completely abandon the regulation.

In the case of a company positioning itself as overtly reluctant to the legislation, it may pursue a strategy to value a voluntary commitment as a solution completely satisfactory for stakeholders. However, when the issue reaches the state of a political bargain, it is hard to enunciate such an opinion. Simultaneously with an acceptance of regulatory principles on the issue, a company can lobby on the details of secondary legislation. Self-regulation is leveraged to negotiate the details contained in implementing provisions and to lobby policymakers with arguments based on operational constraints. This is observable when considering the negotiations of the implementation schedule. Companies ask for additional time in form of transition periods, so they can adapt and slightly manage the organizational change while conforming to the new legislation. Retailers are ready to “be good implementers if things seem logical and if [they] are given consistent deadlines” [E5].

In addition, the legal transition periods offer companies the possibility to advertise their practices as voluntary, while in fact, they constitute an early compliance behaviour. From January 1st, 2020, single-use plastic tableware was banned from sale and Auchan announced six months in advance, “we're going to do it, before everyone else. It's also a communication effect...” [A4]. Also, through voluntary commitments and early compliance behaviour companies may better anticipate the business impact of future regulations on the entire value chain.

Box 5. Voluntary engagement in the implementation of plastic bottle collectors as a means to anticipate a regulation on the packaging and ensure sourcing of recycled material

We are securing a future market since RPET [recycled plastic] will be imposed in part of the manufacture of plastic bottles or other types of plastic. Therefore, the collection of PET will be important. There are a few initiatives in shops to set up machines to collect plastic bottles. We know that this is a material which, for the moment, is highly recovered. So we also have other sources to recover waste. This has a double advantage :

- of helping us tomorrow to inject it into our manufacturing plant. We have a water plant, Aquamarque for the water in the reception area. As well as Karmené, our slaughterhouse in Brittany which, with our Tradislège brand, whose [meats] packaging, future plastic packaging, will integrate more and more recycled plastic. We have to supply our factories prioritarily; and*
- at the same time, at the environmental level. One out of every two bottles ends up in the environment. If tomorrow, we manage to encourage our customers, through an economic advantage that will remain on the margin, but which will still have a cost for the shop, to bring back the plastic bottles. We know that the countries that have implemented this [solution] have higher collection rates, around 90%.*

So, we are both doing something for the planet and at the same time, we would make it possible to secure and have a material that is recoverable and recovered. [E5]

It is significant that, over the years, the time during which negotiations take place has been significantly reduced. As shown in Figure 7 – Overview of French environmental legal framework applied to food retail sector (see page 107) – the consecutive laws are voted on at ever shorter intervals. In addition, they are punctuated by other policy statements, frameworks, and guidelines. Consequently, Self-regulation is all the more important. Companies need self-regulation in advance because political decisions are taken much faster than it used to be. So, if they neglect to conduct pilot projects, they condemn themselves to depend on others' decisions without a possibility to constructively participate in the issue-settlement.

(...) the way the production of rules works in France. Now there are rules everywhere, all the time and they are renewed very quickly. [Previously] companies worked on regulations that I saw emerging five or ten years later. It is less and less true because the time of passage from the civil society which strongly carries a subject to the regulation has become terribly shortened. When I see that there is a problem with mineral oil in cardboard, in a paper, between the moment when the associations start to speak about it and the moment when the minister takes a

decision, it's significantly shortened. Moreover, we don't even have the time to validate the solution definitively when she has already taken her measure. [S3]

It is demonstrated that self-regulation is leveraged principally to influence the shape of future legislation and less against it. By not engaging voluntarily on nonmarket issues, companies risk being caught unprepared to make decisions on matters where they do not comprehend the consequences and possible regulatory outcomes. Mobilising self-regulation as a nonmarket strategy provides firms with more credible arguments in a political bargain thus reinforcing their impact on the issue-settlement.

Potential outcome(s)

The mechanism of “shaping the regulation” can be behaviourally described as the one modifying the content of the regulations. This third mechanism results in the alteration of legislation in terms of compulsory rules and their implementation schedule. It develops in the following manner: a company leverages Self-regulation to change policymakers’ perception of the issue. Consequently, this opens up the possibility for further negotiations to settle the issue.

Imposing compulsory rules have sense if they remain applicable to real problems. Overall, solutions to social problems necessarily take the form of institutional adjustments: of actors to the norms and regulations, and of the regulations to the business conditions in which actors operate. Finally, a bi-directional institutional adjustment is observed, where an organization set up Self-regulation that fits the requirements disclosed in a regulatory threat and, on the other hand, the experience is leveraged to influence the details of the legislation.

However, it is clearly demonstrated that despite the mobilisation by retailers of Self-regulation as a tool to avoid legislation, environmental regulations are a specific domain where the general tendency is to increasingly enact laws at ever-shorter intervals.

The idea was that, through the voluntary agreement, we could value what we've already done, but also, we could say “We don't want the implementation of the new law on the issue (...) so we make a voluntary commitment”. [A10]

As expressed by a representative of the sectoral association companies have “the feeling that there was no point in making voluntary agreements (...) because in the end [retailers] are

always caught up by the law (...) sanctioned by the law” [S1]. Ultimately, the retailers ask themselves “how long voluntary commitment can last?” [S1] before the law obliges companies to do what they already do.

In conclusion, the third mechanism relies on self-regulation as means to provide reliable information to policy decision-makers and reinforce a company’s credibility in a political bargain on a nonmarket issue. It unfolds *via* direct negotiations with policy decision-makers, in three consecutive phases: (1) company leverages self-regulation, (2) policymakers realise the issue’s complexity. (3) entities negotiate on legislative details. Normally, the political bargain considers the draft regulation during the legislative process. However, the negotiations can take place while the executive acts are eventually proceeded. It is therefore focused on influencing the details, for instance, the transition periods, and not necessarily to forestall the regulation.

Summary of section 5.1.

As stated in this section, three generic mechanisms were identified in the study. Thus, it answers the first research question, “What are the mechanisms through which self-regulation operates in the nonmarket environment?”.

Mechanism 1 – endorsing the voluntary commitment – is focused on information provision and diffusion among a wide variety of entities. It is to note that the publicly diffused information remains available for the decision-makers, even if they were not considered a target population. The objective of communicating on self-regulation is to present the company’s expertise and acquire a better reputation. In turn, the arguments based on voluntary engagement used by the company in the public or political debate can be considered more credible or stronger. The voluntary initiative becomes recognised by stakeholders for its qualities (for instance, innovation, and efficiency) and is publicly endorsed. It can also become a reference in further issue settlement.

Mechanism 2 – transforming the geography of power – unfolds in the interactions between the company and various other actors, including market and nonmarket stakeholders in its ecosystem. It operates in a network of entities engaged in the issue (or potentially interested in it) and is aimed at gaining support and recognition from others in the quest for partnerships and pro-business coalition building. Mechanism 2 acts upon the typology and positioning of actors in the political bargain to reinforce the company’s own position.

Mechanism 3 – shaping the regulation – unfolds in the political arena, mainly through lobbying activity, when a company seek to directly influence the draft legislation or regulatory content. It is activated in an advanced phase of issue settlement. Mechanism 3 covers interactions between the firm and political decision-makers. It is aimed at demonstrating the complexity of an issue and proposing alternative solutions aligned with the self-regulatory experience. The mobilisation of political assets is focused on information and access to policy decision-makers.

Hereafter, a summary table presents the main characteristics of each mechanism, including entities engaged, and mechanical and behavioural descriptions, among others.

The following section presents the interactions between the mechanisms and proposes a model that comprehensively integrates them.

Table 29. Nonmarket mechanisms based on self-regulation

Mechanism		Actors		Unfolding		Output		
		Entities engaged	Interactions	Principal actions	Mechanical description	Goal	Behavioural description	Political resources
M1	Endorsing the voluntary commitment	The company and a large variety of actors: employees, customers, investors, business partners, activists, NGOs, media, communities, the public	Organization ↔ Public	Disseminating information	Changing information available in the system → Changing the perception of the issue/the organization	- to change public issue perception - to raise public awareness - to ease social pressure	Change the perception of the politically active organisation by other actors	- expertise - public image - reputation with political actors
M2	Transforming the geography of power	The company and target entities in the market and nonmarket environments which become political actors	Organization ↔ other organizations	Engaging in partnerships	Changing the number of actors → Changing their bargain power	- to move out of the political arena - to engage new actors in the political arena - to ally with stakeholders	Change the power interplay between different actors in a political bargain	- stakeholders' support - constituency building
M3	Shaping the regulation	The company and policy decision-makers	Organization ↔ institutions	Lobbying	Introducing alternative options to the existing nonmarket/institutional landscape → Influencing the regulation	- to change policymakers' issue perception - to introduce/promote an alternative nonmarket issue or solution - to influence legislative content or executive acts	Complexify the nonmarket environment	- information - access to policy decision-makers

5.2. Mechanism-based model of self-regulation as a nonmarket strategy

This section provides a mechanism-based model of self-regulation as a nonmarket strategy. It combines the three mechanisms previously identified, that is, (1) endorsing the voluntary commitment, (2) transforming the geography of power, and (3) shaping the regulation. It further explains their mutual relations by answering the second research question: “do some of these mechanisms intertwine with one another?”.

By activating the first mechanism, the company interacts with the public and a large variety of stakeholders. Through information dissemination in various arenas, it has an impact on the issue perception by different actors. It allows a company to create a positive public image and acquire a reputation, which remains essential for the credibility of other activities undertaken in the nonmarket environment. The second mechanism directly modifies the relations with stakeholders, as self-regulation acts upon their interests. It unfolds in the political arena and enables coalition building - an important political asset. Also, this mechanism allows modification of the nonmarket environment *via* market relations. The last one is activated in the phase of the political bargain between the company and policy decision-makers. It directly impacts regulatory institutions through lobbying and alters information and assets that move the issue through the legislative and executive arenas.

The analysis of patterns in activating different mechanisms through self-regulation suggests that the configurations of various mechanisms depend on setup conditions, level of self-regulation engagement and effectiveness, the presence of other actors in an arena and their behaviour in response to firm self-regulation. In the first sub-section (5.2.1.), these features are discussed. The model depicting mechanisms intertwining is further exposed in the second section (5.2.2.).

5.2.1. Features impacting mobilisation of self-regulation as a nonmarket strategy

5.2.1.A – Characteristics of self-regulatory initiative

Pre-existing self-regulation is not a required precondition for activating all of the mechanisms. It seems that when firm wishes to act quickly - for instance, engage in a public debate at an early stage of the issue life cycle and act upon its saliency or perception - existing voluntary commitment is an advantage. It allows a company to leverage directly on current practice. Also, pre-existing self-regulation enables rapid and less-costly engagement in the bargaining process in the legislative arena. However, pre-existing self-regulation is not required in the initial setup. A voluntary commitment can be deliberately put in place to answer a specific external pressure and tailored to respond to it directly.

As long as the seriousness of voluntary commitment is concerned, the differentiation between substantial and symbolic self-regulation plays a crucial role in the effective functioning of all mechanisms. The intensity counts because operational self-regulation needs to be substantial enough to be considered convincing and have any persuasive effect on other actors' behaviour. Still, the formulation "substantial enough" refers to each actor's own sensibility on the issue and is not satisfactory from the researcher's point of view. Mechanisms can continue to deliver results under both substantial and symbolic self-regulation. However, if self-regulation is judged not "satisfying" and a firm risks being accused of greenwashing, the risk of strategic backfire rises significantly.

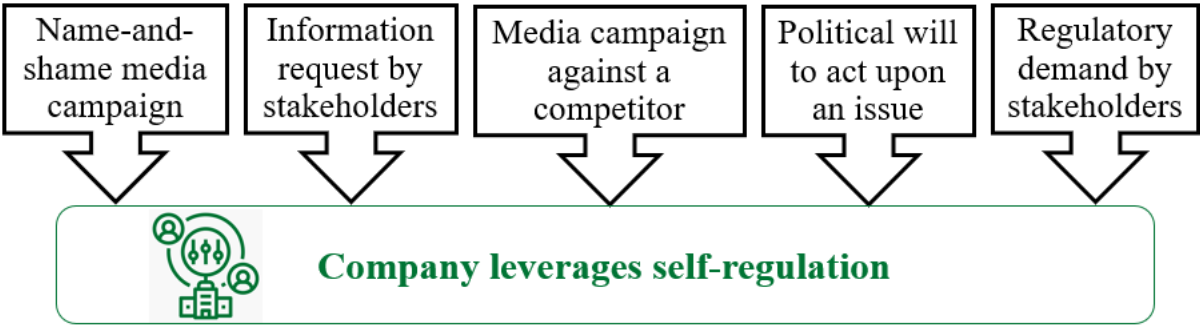
The mode of communication regarding voluntary commitments and initiatives toward different actors remains crucial to achieving the desired outcome for all three mechanisms. The information communicated and the channel used must be adapted to the target interlocutor.

5.2.1.B – Type of external pressure - actors and activators

In the nonmarket environment, the interrelations between social background, public policies and self-regulation are tangled, making it somehow challenging to identify forces at

the origins of its evolution. External pressure is the primary activator of self-regulation as a nonmarket strategy. Even if voluntary commitment is implemented to improve operational efficiency, its mobilisation in the nonmarket environment results from external pressure. The results show that self-regulation is leveraged to answer various types of pressure, as presented in the figure below.

Figure 24. Social and political activators of self-regulation as a nonmarket strategy



These examples and data relating to competitive pressure allow categorising the types of external pressure into social, political and market-based. The table below presents quotations for different activators.

Table 30. External pressure driving the self-regulation

Verbatims	Activators	Pressure
<p><i>Foodwatch tracks down misleading labels in supermarkets. For its launch in France, the NGO (...) inaugurates its action with a first petition, targeting the Leclerc company [Liberation, May, 6th 2014]</i></p>	<p>Name-and-shame media campaign</p>	<p>Social</p>
<p><i>In the actions we undergo, there are a certain number of issues that NGOs fight for, and they ask us to position ourselves or provide clarifications on our practices. [A3]</i></p> <p><i>Has the Grenelle [Law] really changed anything? No, I think it's more the public... Citizens, NGOs who question us, [they] can really change how shops proceed daily. (...) We are also questioned a lot. I think that the fact that customers and employees ask us more questions about what is being done. (...) That's what drives us. [E2]</i></p>	<p>Information requests by stakeholders</p>	
<p><i>The constraint beyond the regulations and the financial aspect, I think it's the image (...) it's true that today we think a lot more about the image (...) This is a lever that I use with managers saying "beware of the bad buzz that can be created". (...) Today, I would say that beyond the regulatory and financial constraints, the image and positioning of the company are important. [A6]</i></p>	<p>Image / reputation</p>	
<p><i>It is also because the government - Brune Poirson - wants to discuss directly with the companies. [S1-2]</i></p> <p><i>There is also the will of the government to go fast, make a buzz, and show the results. For example, when the mandate ends in 2 years, depending on the date of the presidential elections, they want to accelerate the political agenda and show what they have done while in office. [A4]</i></p>	<p>The political will to act upon an issue</p>	<p>Political</p>
<p><i>The company's founder [TooGoodToGo – service provider] has succeeded in mobilising a community (...) She asks State to move on the legislation on consumption dates, environmental information... [E6]</i></p> <p><i>All the associations, the NGOs that start lobbying, and the people who start being interested in waste (...) it has an impact [A6]</i></p> <p><i>We want to put pressure on manufacturers and public authorities to force them to provide transparent information [Ingrid Kragl - FoodWatch France, press article Liberation, May, 6th 2014]</i></p>	<p>Regulatory demand by stakeholders</p>	<p>Political / Indirect social</p>

Verbatims	Activators	Pressure
<p><i>It's clear that, in general, all large-scale distribution is lumped together. So, people don't necessarily distinguish between E.Leclerc, Auchan, Carrefour, Intermarché, etc. When there is something wrong, a brand that does something wrong, people will confuse everything and lump everyone together. That's for sure. [A9]</i></p> <p><i>The objective [of the NGO] was to attack them [competitor] so that the other retailers would also move on the issue and also the European Commission would take up the subject and ban this practice. So, there is always pressure... [E1]</i></p>	<p>Campaign against a competitor - Reputational commons</p>	<p>Competitive / Social pressure</p>
<p><i>E.Leclerc has helped the large-scale distribution sector to separate itself from single-use bags, and in a broader sense, has even contributed to the abandonment of single-use bags a few years ago. I admit it is also thanks to E.Leclerc that we abandoned the bags a few years ago. [A5]</i></p> <p><i>We also do a lot of communication (...) to force everyone. If we start talking about plastics, it also forces [all actors] in the field to make an effort. [E2]</i></p>	<p>Competitor's commitment</p>	

Indeed, the external pressure is exerted by various stakeholders, including all categories of nonmarket actors: media, citizens/the public, community, activists, NGOs, sectoral and trade associations, government/policy decision-makers, regulators, and executive authorities.

Demonstrating self-regulation is a means to put (competitive) pressure on other companies within the sector and oblige them to realign in their voluntary practice. On the contrary, self-regulation leveraged as a nonmarket strategy can be mobilised to avoid negative reputational commons or suffering from activists' campaigns targeted against other companies.

Social pressure may be executed directly on the firm *via* product boycotts, online petitions, media (including internet) campaigns, and statements to the press, among others. Also, stakeholders enact indirect pressure on a company. In such a case, they overtly and explicitly request policymakers to regulate an issue without previously targeting an economic actor. Activists and adverse interest groups' recourse to direct lobbying political decision-makers can lead to political pressure or genuine regulatory threat. A company can try to satisfy the social demand to relieve this "indirect" pressure and avoid the "escalation" of external pressure.

It is shown that external pressure progress over time following the logic of gradual increase from social pressure through a political uptake by the political decision-makers to the direct regulatory threat. Also, it is interesting to note that once the regulatory threat arises, ultimately, a law is always passed. "Generally, what happens - there are expectations from civil society, and then the legislators give a direction" [E7]. An issue usually moves through its lifecycle, pulled first by media coverage of the problem and then by a political will to act upon it. Also, once it is settled, it can enter a phase of standardisation and institutionalisation, so the performance of different actors can be compared over time.

When I first did it [donated the unsold food in 2008], my partners nearly kicked me out, saying "It's not possible. Is there any law? It's too risky if you continue doing that and we're controlled". But we didn't give up. And then progressively, the media became interested in the issue, then other retailers. And the State started to legislate on it, saying, "that's what you have to do". Today, it's in all activity reports. The auditors or the accounting experts of the auditing firms expect us to provide information in a section on food sponsorship. You must donate (...). I think it's all about communication; companies and the media have made the issue emerge. [E6]

Thus, an issue rises under specific initial conditions but can afterwards continue to evolve under different types of external pressure exerted simultaneously. Nonetheless, the ultimate

regulatory threat - understood as the potential that regulations or legislation by the government could significantly alter business prospects - does not always have to be the result of social pressure. It can occur independently from the social demand or threaten the firm with somehow different regulations than those claimed by the activists. Thus, there may be no correlation between different types of pressure in terms of regulatory content.

To summarise, different types of external pressure – competitive, social, and political – are identified as triggers for a company to mobilise self-regulation in the nonmarket environment. They are not mutually exclusive and are often observed simultaneously. Also, as the nonmarket issue moves over the lifecycle, the predominant type of pressure evolves. Thus, leveraging self-regulation as an answer to a specific activator impacts other actors' behaviour, including those not necessarily present in the initial setting.

Moreover, the type of external pressure exerted on the company partially determines the stages of issue settlement, as presented in the nonmarket problem life cycle. Not all nonmarket problems move over all stages, from the emergence and rise of issue saliency in the social arena to the settlement in the political one. An issue can emerge on social background, or directly under political pressure.

If an issue rises under social pressure, a company has the possibility to decide whether it prefers to bring it directly into the political arena (case 6) or to deal with it by responding in the social arena, thus possibly avoiding escalation and the political bargain stage (case 7). On the other hand, if the issue emerges directly in the political arena, a company may decide to keep its saliency low and pursue its activity only in the political arena (case 8) or attempt the settlement by simultaneously mobilising self-regulation in relation to the social actors (case 9).

Identifying the above characteristics helps predict the activation of the nonmarket mechanism based on self-regulation in specific circumstances. However, it also demonstrates that nonmarket outcomes might be generated directly by activating one of the three mechanisms or activating a sequence of mechanisms. This point is addressed in the following section.

5.2.2. Model of mechanisms interactions

The three nonmarket mechanisms relying on self-regulation – (1) endorsing the voluntary commitment, (2) transforming the geography of power, and (3) shaping the regulation – are aimed at reinforcing the company’s position in the nonmarket environment. Each mechanism unfolds through interactions with specific actors by disclosing information on voluntary commitments. The same self-regulatory initiative undertaken on a specific issue can be at the origin of each mechanism. The way of activating them stands on how the issue moves over its life cycle from the phase when a company can still act on issue saliency and perception, through the phase of interest groups formation, up to the legislative phase.

The schematic figure of the mechanism-based model presents the three nonmarket mechanisms that can be activated by self-regulation and how they intertwine altogether.

Figure 25. The model of interactions between nonmarket mechanisms based on self-regulation.

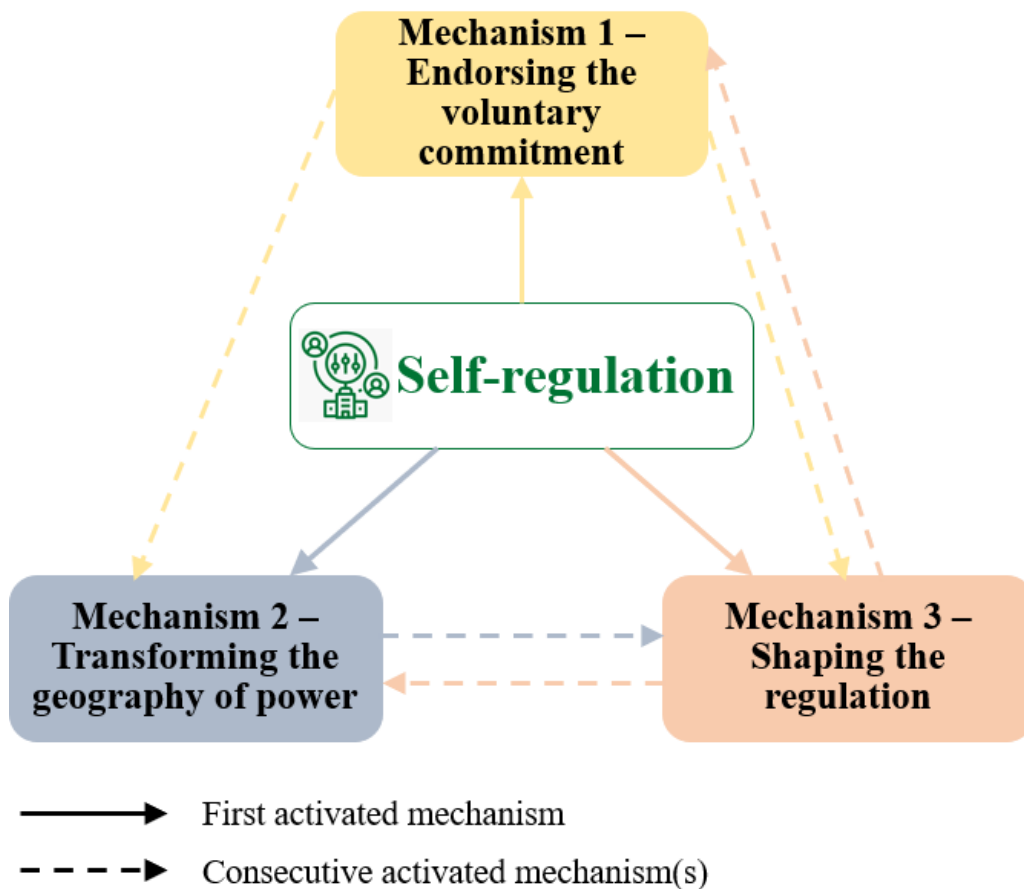


Figure 26 presents in the centre the self-regulation mobilised in the nonmarket environment, which is at the heart of the exploration. The three arrows connecting directly self-regulation with mechanisms indicate that each of them can be activated independently, as the first one. Only afterwards, the other arrows show the possible combinations of consecutively activated other mechanisms. Further in this section, a detailed description of the process is provided.

5.2.2.A – Activating the mechanisms exclusively.

Mechanisms 1 – Endorsing the voluntary commitment

The mechanism of “endorsing the voluntary commitment” significantly impacts the relation of a company with other entities. The main goal of activating mechanism 1 is to diminish external pressure. A characteristic feature of mechanism 1 is linked to its deployment through communication. Different channels (institutional communication, public relations, and consumer campaigns) are deployed to tackle specific target audiences. Although a company activates it through communication, it has another, specific to the nonmarket activity, objectives, *e.g.*, sharing knowledge, growing issue awareness, and motivating actors to engage on the issue.

Seeking the endorsement of voluntary commitment is possible at any stage of the issue life cycle. Mechanism 1 allows to diffuse the information on self-regulation in the system but is not explicitly focused on action in the political arena. Indeed, the pioneering companies with a firmly established self-regulatory initiative are keen to mobilise it from the stage of issue emergence. Mechanism 1 is universal in the sense that it can be activated for issue settlement in different arenas and allows targeting any market and nonmarket actors (that company enters into relations with). Thus, it is particularly suitable to respond to social and political pressures. “Endorsing the voluntary commitment” activated at a very early stage of issue emergence (cases 7 and 9) can be sufficient to block further issue development (at least in the short or medium-term). Also, a company having trouble convincing decision-makers of a specific policy's merits may try to have an indirect impact on decision-making by shaping public opinion. So, a company can mobilise self-regulation to seek public support.

However, once the regulatory threat appears, companies no longer activate Mechanism 1 in an exclusive manner. Half of the analysed trajectories confirm the pattern when the

communication launched before the regulatory threat phase persists over time. Also, the example of unpacking platforms at the checkout and Auchan's answer to a rapid escalation of external pressure show that activating mechanism 1 is not well suited to counterbalance the strong political will to regulate.

It is observed that in some circumstances, a firm may deliberately decide not to activate the mechanism of endorsing the voluntary commitment. It is foremost the case when self-regulatory practice is not well developed or when the results of implemented voluntary commitment remain unsatisfactory. In such a situation, the activation of mechanism 1 is risky as the company may be accused of greenwashing. It allows the conclusion that the probability of leveraging self-regulation in public communication rises when voluntary initiatives bring tangible results and represent highly qualitative projects.

Regarding the external reasons that may explain this decision, the results suggest that it regards highly technical issues (where the company finds no interest in explaining the details to the public) or complex cases with contradictory demands and external expectations. Also, when a behavioural change by the customers is necessary for the efficacy of the implemented solution, the retailers are more hesitant about publishing the cases.

Mechanisms 2 – Transforming the geography of power

Mechanism “transforming the geography of power” impacts the relations between a company and different organisations in the nonmarket setting. It is advantageous in the interest group formation stage of the nonmarket issue life cycle. A company activates it to transform the bargaining power of actors, which further determines their engagement in the political arena. Modifying the number and position of actors and interest groups active in political bargain further affects the issue-settlement regarding the content of regulatory provisions. This mechanism is activated by a company when:

- the social pressure is addressed directly at the company (the interplay in the nonmarket environment is between a firm and an NGO), or
- the *status quo* regarding the actors engaged in the issue settlement and their bargaining power would not bring the optimal regulatory results (from the company's point of view). The capacity of a company to mobilise other entities in

political negotiations (*e.g. via* collective lobbying) impacts the possible activation of Mechanism 2.

The decision to carry on a passive nonmarket strategy can be at the origin of activating Mechanism 2. Self-regulation may lead to withdrawing from the political bargain and abandoning political action. It is common to seek an alternative representation of own interests, especially if satisfying a potential regulatory prescription requires a company's collaboration with other partners in the sector, its value chain or business ecosystem. This alternative representation can take the form of individual lobbying by partner actors or collective action. Also, joint action has a higher impact in the political arena. The sectoral association is considered more effective in carrying out political actions and seems “*more legitimate to speak since it represents a group of players and not just one player*” [A10].

Activating mechanism 2 is observed principally when the issues are characterised by diffused social responsibility. Indeed, in these conditions, self-regulatory initiatives (and their efficiency) depend on cooperation with stakeholders. The possible arrangements between a company and different actors contribute to improving firm performance, as they help establish and maintain relationships with various stakeholders. For instance, regarding the case of chemical substances in recycled packaging, the retailer, as the prime contractor, could not change the current practice independently. It required a joint position of retailers, recycled material providers and printers to lobby on executive acts and detailed regulatory prescriptions.

Mechanism 3 – Shaping the regulation

The “shaping the regulation” mechanism is activated when a company wishes to settle the issue by impacting the regulatory prescription. For this aim, a company enters directly into relation with policy decision-makers and bypasses other actors who may be involved in the political bargain. Direct activation of mechanism 3 happens when a company has a significant experience of self-regulation regarding the issue and can provide the decision-makers with solid arguments to challenge the law. It may serve to drive rapid regulatory change. On the other hand, while lobbying is often considered a practice focused on influencing the content of legislation, mobilising self-regulation to challenge the law may have various other objectives, for instance:

- rejecting the necessity to regulate the issue,
- consenting to the necessity to regulate the issue but influencing the content of executive acts, so they are as much aligned as possible with the existing self-regulatory practice,
- demonstrating the inefficiency of the proposed normative solution and proposing alternatives,
- justifying, in advance, the future no-compliance.

It may seem counterintuitive; however, Mechanism 3 is not systematically activated when a regulatory threat appears. The results show various circumstances in which a company resign from individual and direct policy decision-makers lobbying. A company may abandon individual action in the political area if, after analysing the draft law, it appears that the law would have little impact on the company's operations. First, the impact of the legislation may be insignificant when the company, thanks to the voluntary commitment, has already complied with the future prescription. It means that through self-regulation, it has already implemented the expected (future) policy and has no need to transform its internal functioning. Thus, basically, challenging the law is not necessary from the company's point of view, as it has already aligned itself with the normative expectations. Second, the experience of self-regulation can serve as an argument to oppose the applicability and efficacy of a particular legal solution. Regarding the unpacking platforms at the checkout, Auchan, after implementing the voluntary project, demonstrated that, in practice, it did not work and did not bring the expected results. Consequently, legislating on the non-functional solution had no impact on firms' behaviour, as it ignored the legislation in the absence of controls and sanctions.

Moreover, when facing a regulatory threat, a company may “delegate” the lobbying effort to other actors. A classic manner of doing this is to join the collective lobbying effort *via* sectoral structure. Nonetheless, the example of Auchan's policy on plastic bags shows that implementing a joint project with a supplier can be used as a technique to outsource the political activity to the partners in the value chain. Making other companies indirectly concerned by the legislation that targets retailers allowed Auchan to officially support the new legislation banning single-use plastic bags and not carry out individual action against new regulations. At the same time, it was the partner company that took an important role in the political bargain on the draft legislation on this specific issue.

The three identified mechanisms can be activated independently, concomitantly, or consecutively (based on the same voluntary engagement) depending on the issue’s maturity in the lifecycle and the type of stakeholders involved in its settlement. Despite the linear description of the interactions in the cases (see Appendix 11), the mechanisms are not necessarily sequential or linear. Different configurations of mechanisms’ activation are possible, and each is further discussed. Also, the conditions in which they are activated are further scrutinised to understand their interrelations better.

5.2.2.B – Activating the combination of mechanisms

Mechanism 1, in combination with others

This part of the results is based on the analysis of the following cases:

- 1 – FoW-A, 2 – Don-A, 3 – Don-EL, 4 – Pla-A, and 5 – Pla-EL.

Figure 26. Reminder of selected cases (1, 2, 3, 4, and 5) and mechanisms intertwining

Code	Domain / Company	Existing self-reg	Pressure			Mechanisms intertwining	Law	
			Initial	Additional	Ultimate			
1	FoW-A	Food waste / Auchan	Yes	Political		Regulatory threat	M1 → M3 + M2	
2	Don-A	Food donations / Auchan	Yes	Political	Social	Regulatory threat	M3 + M1 → M3	
3	Don-EL	Food donations / E.Leclerc	Yes	Political	Social	Regulatory threat	M1 + M2 → M3	
4	Pla-A	Plastic / Auchan	Yes	Social	Political	Regulatory threat	M1 → M2	
5	Pla-EL	Plastic / E.Leclerc	Yes	Social	Political	Regulatory threat	M1 → M2	

Regarding a combination of identified nonmarket mechanisms, a textbook example is the consecutive activation of mechanisms 1, then 2 and finally 3, according to the progressive stages of the nonmarket issue life cycle. Nonetheless, activating the mechanism “endorsing the voluntary commitment” reinforces a firm’s nonmarket position; thus, as long as combinations of mechanisms 1 with others are concerned, the order seems not to have particular importance. The possible combinations are as follows: M1 + M2, M1 + M3, M1 + M2 + M3.

The bargaining power of actors in the political arena is based on informational asymmetry, as the information remains a valuable asset in the nonmarket environment. Thus,

access to information affects the positioning of actors. Information is also an essential component of shaping the regulation. Consequently, sharing information on voluntary commitment in public lays the foundations for further action to influence the nonmarket environment through specific political activities.

The purpose of intertwining Mechanism 1 with others is to reinforce the company's image in the eyes of stakeholders. Also, it helps to raise the credibility of solutions proposed by a company, as it transparently demonstrates its return on experience. The usefulness of mechanism 1 in transforming the geography of power (a combination of Mechanisms 1 and 2) remains unquestionable as the formation of interest groups and coalition building require recognition of mutual engagements by the actors involved in the partnership. Also, endorsing the voluntary commitment by multiple actors strengthens the status of interest groups as source cues. The example of plastic policy demonstrates that arguments (based on self-regulation) may influence public opinion and the formation of lobbying coalitions. Regarding the regulatory threat, retailers' individual actions focused on advertising singular self-regulatory initiatives have been reinforced by involvement in collective projects with a much broader scope (the transition from single-use plastic bags to all plastic policy).



When both types of external pressure - social and political - are exercised on the company, M1 is always activated as a corporate answer to deal with the issue. A company activates M1 as the primary answer when the two types of external pressure appear together, no matter their order, as demonstrated by cases 3 – Don-EL and 4 – Pla-A. However, it is also observed that the issue systematically moves forward to the regulatory threat phase once social and political pressure occurs. It can be stated that the combined political and social pressures create circumstances in which it is difficult for a company to avoid the ultimate phase of issue settlement, that is, a political bargain over draft legislation. In such a case, the combination of mechanisms is activated in the entire process of issue settlement to answer various types of external pressure over the same nonmarket issue.

Also, mechanism 1 is used to reinforce the company's position when a first corporate answer does not counterbalance one type of external pressure and an additional second type of pressure occurs, as demonstrated in case 2 – Don-A. Here, after Mechanism 3, activating mechanism 1 is a reply to additional social pressure expressed in the media.

Mechanisms 2 and 3 in combination

This part of the results is based on the analysis of the trajectories 6 – ReP-A, 8 – Che-A and 10 – ReP-EL.

Figure 27. Reminder of selected cases (6, 8, and 10) and mechanisms intertwining

Code	Domain / Company	Existing self-reg	Pressure			Mechanisms intertwining	Law	
			Initial	Additional	Ultimate			
6	ReP-A	Recycled Packaging / Auchan	Yes	Social		Regulatory threat	M3 → M2	
8	Che-A	Checkout / Auchan	∅	Political		Regulatory threat	→ M3	
10	ReP-EL	Recycled Packaging / E.Leclerc	∅	Social		∅	M2	
							→ answer to regulatory threat	

Activating both mechanisms, 2 and 3, impacts issue settlement in the political arena. Both influence the political bargain, the former regarding the engaged actors (and their political power), and the latter through the arguments employed to move the issue. The decision of activating mechanism 2 or mechanism 3 is driven by external features, primarily the fact that an issue is advanced in its lifecycle. Also, the order in which they are activated seems important due to the level of regulatory risk (low or high) and urgency to act.

The combination of M2 + M3 provides the company with a more powerful position within all interest groups to negotiate the regulatory outcome. As demonstrated before, leveraging self-regulation to transform the geography of power does not exclude individual lobbying, thus mobilising both mechanisms results in mutual reinforcement.

The combination mechanisms starting with the “shaping the regulation” (Mechanism 3) occurs when a company under social pressure decides to push for regulation, rather than to enter into the political interplay with various interest groups. In such circumstances, an argument for Auchan (case 6 – ReP-A) was that the social expectations are too high, and the problem should be solved legally on a supra-national level. Only afterwards, when it succeeded in moving the issue rapidly through the political arena, the company decided to activate mechanism 2 while bargaining on executive acts to the enforced legislation.

Specific circumstances are identified in case 8 (Che-A) on unpacking platforms at checkout. Auchan directly activated mechanism 3 and afterwards abandoned the lobbying on the issue. The corporate behaviour did not lead to an activation of any other one, despite a genuine interest in the issue. It can be explained by the fact that food retailers collectively decided to abandon lobbying on this specific prescription while focusing their efforts on other

regulatory aspects of the circular economy draft law. Consequently, the mobilisation of Mechanism 2 (which could be attributed as the following step in nonmarket strategy) was directed to an alternative issue. Thus, it does not account for the reply to the unpacking platforms issue and was not included in the analysis.

In our sample there is no case with the combination of mechanisms where the first one activated would be M2, it is always preceded by M1 or M3. One plausible explanation of such a situation is that the firm's credibility regarding the issue and the company's capacity to mobilise other partners in collective lobbying impact the possible activation of Mechanism 2 later in the issue-settlements process.

Summary of section 5.2.

To conclude, the mobilisation of self-regulation can help achieve various outcomes in a nonmarket environment. It is found that mechanisms have common activators. The most common are social and political pressure, which can further transform into a regulatory threat. However, different activities of stakeholders can be considered external pressure and drive a company to leverage self-regulation in the nonmarket environment. Further, it is up to the company to decide which mechanism it wishes to activate in reply to external pressure through leveraging self-regulation. Also, the self-regulatory initiative shall be substantial and crafted to the stakeholder demand.

Each nonmarket mechanism can be activated independently, but combinations or sequences of mechanisms are also possible. Mechanism 1 – endorsing the voluntary commitment – remains universal and can be activated for issue settlement in different arenas while targeting any market or nonmarket actor. Thus, it is particularly suitable to respond to social and political, but also competitive, pressures. Nevertheless, once the external pressure takes the form of a regulatory threat, companies no longer exclusively activate M1. Mechanism 2 – transforming the geography of power – impacts the relations between a company and other organisations present (or potentially active) in the nonmarket setting. Self-regulation is mobilized during the interest group formation. Activating M2 is aimed at changing the bargaining power of actors, and consequently, influencing their engagement in the political arena for further issue-settlement. Mechanism 3 – shaping the regulation – is activated in the direct relations between a company and policy decision-makers and aimed at influencing draft legislation or future regulations.

Activating the combination of mechanisms is observed when the nonmarket issue goes through different stages of issue-settlement. Also, activating different mechanisms can mutually reinforce the firm's position on the issue, especially when concerning various stakeholders. However, a combination of the three mechanisms is not systematically observed, which shows that depending on the external circumstances, a company may have no interest in mobilising self-regulation in all dimensions of the nonmarket environment or towards all actors.

Closure and Transition

Chapter 5 answers the following research questions: **What are the mechanisms through which self-regulation operates as a nonmarket activity? Do some of these mechanisms intertwine with one another?**

These findings result from exploring how self-regulation unfolds in the political and social contexts. **Three mechanisms operating in the nonmarket environment are identified: (1) endorsing the voluntary commitment, (2) transforming the geography of power, (3) shaping the regulation.** Each of them acts upon a specific category of actors. Whereas the first mechanism changes the stakeholders' perception of the issue and impacts the company's credibility, the remaining are closely linked to the firm's activity in the political arena. The second mechanism modifies the number of entities engaged in the issue-settlement and political bargain. Thus, it transforms the power relation between different actors. Last but not least, the third mechanism directly unfolds in a lobbying phase of issue settlement, as a company leverages self-regulation to shape the content of legislation or its implementation details regarding the specific regulatory provision.

Further, it is demonstrated that the mechanisms share common activators. Their discriminating features are target actors, communication channels and the type of information diffused. Also, **it is possible to mobilise all three mechanisms in the issue settlement. They intertwine when activated at different life cycle stages of the same issue.** How voluntary commitment is framed and communicated to the stakeholders remains the principal factor of success in leveraging self-regulation as a nonmarket strategy. Overall, these results suggest that corporate self-regulation is an activity of which external stakeholders are typically unaware. Mobilising it as a nonmarket strategy is primarily determined by the communicational policy and corporate political power.

The next chapter provides the elements of general discussion, including the theoretical, methodological, and managerial contributions. Also, it covers the limits and possible extensions of the research.

CHAPTER 6. GENERAL DISCUSSION

This research explored self-regulation as a nonmarket strategy and investigated nonmarket mechanisms activated by voluntary corporate commitment. The conducted exploratory case study focused on organizational self-regulation and sought to understand how leveraging it can transform the nonmarket environment. A mechanism-based research method was applied to the cases drawn from the French retail sector.

The results presented in the previous chapter answer the main research question **How does self-regulation operate as a particular nonmarket strategy?** The findings reveal the nonmarket mechanisms based on self-regulation and propose a model of the interrelations between the mechanisms. It is demonstrated that the **three identified mechanisms - endorsing the voluntary commitment, transforming the geography of power, and shaping the legislation** - are complementary and not exclusive. All mechanisms share a common component part, namely self-regulation, but further, each develops in relation to different actors and impacts the nonmarket environment in another way.

Chapter 6 discuss the place of self-regulation among nonmarket strategies and is structured as follows. In the first section (6.1), the main contributions of this dissertation are outlined, mainly how these findings contribute to the research on nonmarket strategies. The use of the methodological approach by mechanisms in management science is also questioned. The section is completed by presenting some practical, managerial implications of the investigation. Further, after a conclusion in section 6.2., section 6.3. address the limits and a possible future research agenda, respectively.

6.1. Contributions

The results extend the knowledge in the domain of nonmarket research by identifying specific nonmarket mechanisms. By including self-regulation in the panoply of nonmarket strategies, I contribute to a better understanding of their categorisation and possible links between various nonmarket activities. Since self-regulation is a concept mobilised by scholars from several disciplinary traditions (political science, law, management) and is concerned with multiple levels of analysis (organizational, sectoral, global), I hope to enhance and stimulate scholarship among these communities.

First, the idea that self-regulation pre-empts the regulation is reconsidered, and the outcomes in the nonmarket environment, beyond the legislative outcome *per se*, are exposed. Further, regarding the theoretical contributions to the nonmarket strategy research, I tend to expand the knowledge in several directions: differentiation between nonmarket activity-tactic-strategy, the interrelation between various nonmarket activities, and revision of an approach by integrated strategies. As far as methodological contributions are concerned, I outline the advantages of the mechanism-based method and its complementarity with other research designs. Last but not least, managerial contributions are exposed.

6.1.1. Theoretical contributions

1) Regulatory and nonmarket outcomes of self-regulation

Mobilising self-regulation as a nonmarket strategy brings at least two contradictory regulatory outcomes - pre-empt regulation (no new regulation in force) (Malhotra, Monin, and Tomz, 2019) or promote law (obtain favourable future law) (Fremeth and Richter, 2011b). In fact, introducing change in an existing nonmarket context is possible through activities of control, enlargement, or transformation (Ahuja and Yayavaram, 2011). Control towards the environment means to prevent or delay the emergence of an institution or indispose it from functioning. Besides, enlargement and transformative strategies are based on subversion, perception management and institutional proliferation mechanisms. Overall, through self-regulation, the company may substitute public regulation with private or social ordering, promote weaker prescriptions or even compromise the functioning of the executive body. Consequently, it seems appropriate to question how self-regulation forestalls public regulation and what is its regulatory outcome.

First, voluntary commitment can exist instead of law if recognised as a viable alternative to legislation. Consequently, it can be considered that self-regulation simply deters legislation. However, the evidence from this study shows that it is only a temporary perspective used in analyse that differentiates deterring (no regulation) from retarding (postponing its adoption). Forestalling is equivalent to the term "hampering" the introduction of new regulations. A company may succeed in keeping the nonmarket issue out of the political arena for some time; however, there is no guarantee that it will not reappear in the political debate later on. Indeed, it is demonstrated that issues left apart at some stage of a political bargain systematically reappear in consecutive draft laws, even if they seem less tightly linked to the issue itself. It confirms the conclusion drawn from the study in the UK on packaging waste policy that "even with successful pre-emptive self-regulation, government retains the ability to introduce controlling legislation later" (Eden, 1997: 233). The role of self-regulation in hindering and shifting more stringent regulations is noted in areas other than environmental regulation, such as gambling policy or digital ethics (Selin, 2016; Floridi, 2021).

Secondly, self-regulation is mainly leveraged to influence draft laws. It is mobilised for shaping the regulatory content (reducing the severity and costs of compliance) and the implementation schedule (transition periods). The influence over laws and especially executive acts, for instance, the ability to postpone milestones in the implementation calendar, can largely mitigate the expected effects of legislation. Retailers who operate through different types of structures (size, localisation, and distribution channels) admit that making “very ambitious commitments does not mean that everyone can do it; not everyone has the means to do so. (...) One shall not believe that the [self-regulation] objective is to generalise a practice to everyone, that it can be immediately put into a universal law” [S1]. Thus, simultaneously with the implementation of new obligations in ‘advanced’ locations, companies are trying to postpone a universal obligation covering all facilities. While accepting a necessity to transform their policy, companies buy additional time to allow the transformation to take place at the company's pace and not according to the agenda imposed by external actors. Also, companies recognise that participating in issue settlement serves them as guidelines for future directions for their internal policies.

There is a time interval that allows the economic actors to organise, to adapt. Often, the deadlines are too short.

And as a result, the commitments that the brands can make are generally because we know that it is very schematic (...) if we know that in four or five years, we could no longer market such a product, what we can do is to commit ourselves at least two or three years before, to do it in advance. This is also an interesting competitive element. [E7]

As the converging interests of various groups (including firms) are leading to the faster introduction of new legislation, the companies use self-regulation or early-compliance policy to limit the “implementation costs and avoid being trapped in outdated technological solutions” [A6]. From that standpoint, potential regulation does not necessarily force companies to act on an issue if they believe it is premature. Still, it allows companies to anticipate transformation and implement an early compliance policy, which is considered advantageous for their competitiveness.

Multiple nonmarket issues analysed in this research project were eventually always covered by public regulation. The self-regulatory ‘pre-emptive’ perspective leads to believe that self-regulation is unsuccessful nonmarket strategy. Nonetheless, mobilising voluntary commitment impacts the nonmarket environment more broadly. Besides the regulatory

outcome *per se*, it affects political actors' relations and sources of competitive advantage beyond markets. The identified nonmarket mechanisms confirm that companies can directly and actively transform their institutional context through the strategies of information and influence; as they can also enable institutional change indirectly through the institutional spillovers of competition, command, and copy (Cuervo-Cazurra, Mudambi, and Pedersen, 2019). For each actor, the nonmarket strategy objective is mainly to push the issue settlement toward an optimal institutional setting. Nevertheless, the outcome is not necessarily optimal from the individual organisation's point of view, but the one acceptable for most players in the arena.

An organization deals daily with various actors, significantly increasing the complexity of a firm's positioning within its nonmarket setting. Liedong and colleagues (Liedong *et al.*, 2015) present a galaxy of actors³⁸ that revolve around a company and introduce the notion of interactions while specifying its three types: firm-market interaction, firm-non-market interaction, and market-non-market interaction. It is to note that interactions between other actors, independent from the firm's strategy and beyond its direct sphere of influence, often impact its activity. Thus, self-regulation is an example of a nonmarket strategy undertaken in response to other actors' nonmarket strategies, articulating the relations in a much more complex manner. It is demonstrated that nonmarket activities of an actor can form the antecedents for the behaviour of others by making them behave differently as a result of a specific action. For instance, our results confirm that a company under the external pressure of confrontational activists prefers to pursue its voluntary engagement in partnership with cooperative activists (Baron *et al.*, 2016) while disregarding the former.

A detailed analysis of self-regulation as a nonmarket strategy shows that the identified mechanisms can be of first or second order, that is directly induce a behavioural change of other actors or further alter the general context of the nonmarket environment. On the one hand, leveraging self-regulation to directly alter other actors' behaviour would activate first-order mechanisms, leading them to perform specific actions. In such cases, self-regulation can be analysed as a transformative activity aimed at modifying the preferences, interests and aspirations of the stakeholders and the society to make them act in the sense of a firm's interests. An organization compels other actors to act in response to firm self-regulation, so

³⁸ Placing in the heart of the galaxy the firm, the first circle is composed of the market environment (customers, suppliers, competitors, distributors, financial institutions) and the second circle of the nonmarket environment (media, NGOs, trade associations, citizens, government, community, regulators, activists),

they reposition themselves within the nonmarket landscape. Therefore, the goal of self-regulation as a nonmarket strategy is to affect some modification in the target actors' behaviour, knowing that the approach utilized need not focus directly on the intended behaviour. On the other hand, the second-order mechanisms are activated to "transform" the general context in the nonmarket arena. The following quotation from a study on policy design reflects well a concept of second-order mechanism: "*Frequently appearing second-order mechanisms include learning, diffusion transfer, constituency building, adaptive expectations, civic engagement, institutional complementarity, social trust, isomorphism and other similar phenomena. Second-order mechanisms can also be defined as counter-causal mechanisms (counter-mobilisation; negative framing; resistance; opportunism) that can impede expected outcomes. (...) Regardless of whether or not second-order mechanisms are consciously activated (...) agents interact with their environment and begin to produce effects that may not have been originally intended*" (Capano, 2019:6-7). This distinction allows a better comprehension of how the nonmarket environment is transformed by firm self-regulation and enlightens the complex dynamics that the implementation of self-regulation induces in direct relations between two entities, or, with a systemic viewpoint, in the social and political arenas.

Probably the main advantage of mobilising self-regulation as nonmarket strategy is the capability to limit uncertainty of the firm's environment. By activating the three identified mechanisms, the company redesigns its operating context favourably. According to the tactics applied, it enhances its reputation while accessing new audiences or buffering from inconvenient actors, among others.

2) Nonmarket activity, tactic, or strategy

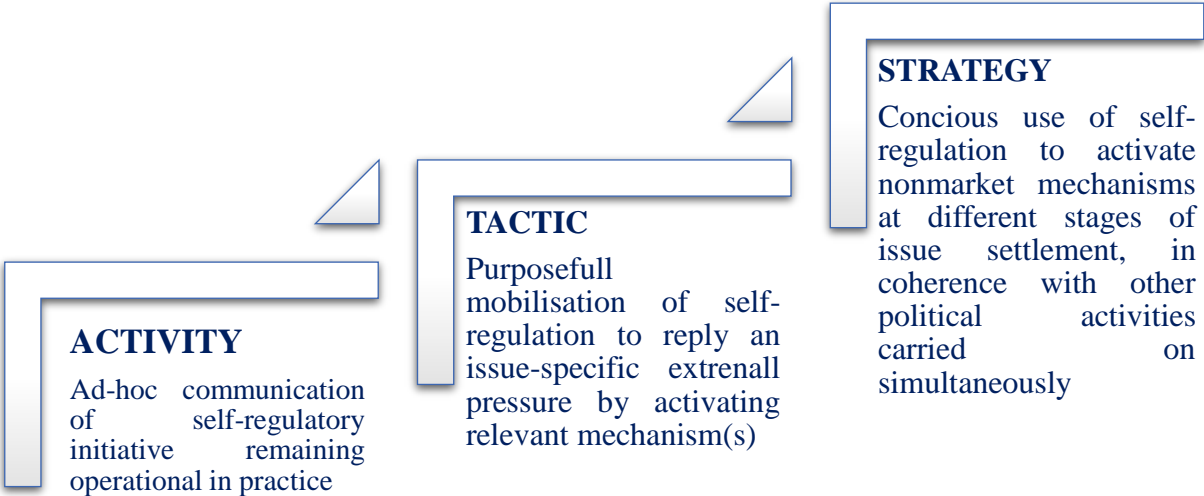
The differentiation between nonmarket strategy *per se* and corporate activities that influence the institutional and social environment (Wrona and Sinzig, 2018) launches the debate on firms' policies and actions that might be accounted as a nonmarket strategy. The generic term 'nonmarket strategy' refers to various organizational behaviours, while the distinction between nonmarket strategy conducted on corporate or business levels remains relatively blurred. An inconsistency in the use of the terms strategy, activities, tactics, actions, *etc.* persists when employed by different authors (Attarça and Corbel, 2018).

In his early works, Baron outlined nonmarket strategy as a “concerted pattern of actions taken in the nonmarket environment to create value by improving its [firm] overall performance” (Baron, 1995a: 47). It highlights the following characteristics of nonmarket strategy. Firstly, it refers to the undertaken actions as the essence of the strategy. The actions must be planned and coordinated, establishing a blueprint. Secondly, the objective of these actions is to improve corporate performance. Consequently, nonmarket strategies show a certain consistency in corporate behaviour, distinguishing them from purely operative ‘stand-alone’ nonmarket activities (Attarça, 2007).

However, most articles and scholars define nonmarket strategy as a single nonmarket/political activity that creates a success potential. According to this approach, the significance of the term ‘nonmarket strategy’ is equal to separately undertaken sequential actions constituting the nonmarket activity. In addition, not all nonmarket actions turn out as strategic because some may remain operative in essence. The *ad-hoc* activities may remain operational in practice (deployed by the company to alter its business conditions) and affect the nonmarket environment as a side effect. Secondly, the term ‘tactic’ appears in literature. Schuler and colleagues consequently use the word “tactics” when talking about a set of multiple, combined political activities carried on deliberately and the word “activity” when a single activity is analysed in isolation from other corporate political activities (Schuler *et al.*, 2002). The third approach defines nonmarket strategy as part of a structured procedure for dealing with nonmarket situations. The strategic nonmarket orientation means that a company develops a shared perspective, coherent positioning, or plan about what kind of nonmarket activities should be pursued, at what aims and how.

Our investigation on how self-regulation is performed in a nonmarket context helps to delimitate better this distinction between different approaches to nonmarket strategy as a singular activity, tactic, or strategy. To the best of our knowledge, no studies have deepened the comprehension of self-regulation in that sense, nor have analysed the other phenomenon through three perspectives at a time. The proposition of the triple nonmarket perspective is presented in the figure below.

Figure 28. Self-regulation analysed with a triple perspective as nonmarket activity, tactic, or strategy



In the shadow of traditional nonmarket activities, self-regulation may be seen as a deliberate activity of dissociating a firm from interrelations with other actors. Demonstrating a firm’s voluntary commitment is an intentional buffering strategy to acquire independence from the external environment, whereas self-regulatory initiative remains operational in practice. The middle course is to consider self-regulation strategic to the extent that “it aims at furthering a firm’s economic goals through its positioning in nonmarket environments” (Salorio *et al.*, 2005: 30). As the environment evolves, self-regulation allows for handling external pressure and taking advantage of changing circumstances. This tactical use of self-regulation consists of activating various mechanisms to develop a competitive edge further. The middle-way “tactical approach” brings multiple opportunities for mobilising self-regulation, as indicated in the table below.

As demonstrated in the table below, various tactics can be pursued to impact all aspects of the nonmarket environment defined by the (IA)³-Framework.

Table 31. Tactical approach to the transformation of the nonmarket environment

Item	Tactic	Pathway for the nonmarket transformation	Relevant mechanism(s)
Issue	Impact issue saliency	Directing one's attention to an issue Keeping law saliency	M1
	Impact issue perception	(Re-) framing issue	M1
Actors	Forge a coalition	Engaging in ad-hoc or long-term cooperation	M2
Interests	Shape existing actors' interests	(Re-) framing issue	M1
Arenas	Switch between arenas	Switching for a more favourable arena: - political, social, or legal, - legislative or executive Seeking for issue settlement on different levels: - supra-national, national or local	M1, M2, M3
Information	Modify informational asymmetry	Reducing or maintaining informational asymmetry	M1, M3
Assets	Influence assets acquisition/possession	Reinforcing own assets Eroding competitors' assets	M1, M2, M3
	Influence which assets matter	Rendering assets essential or useless	M1, M2, M3

Self-regulation can be mobilised tactically to impact issue saliency and perception by other actors. Consequently, it also modifies the type of actors engaged in the issue settlement and their interest in the political bargain. Further, mobilising self-regulation to switch the arena from the social debate to the legislative or executive one, can bring a significant advantage for the company. Last but not least, the information is a principal asset acquired thanks to self-regulation, thus it also acts upon the own and other actors' assets and their utility in the nonmarket context.

The distinction between nonmarket tactical and strategic approaches remains in the temporal vision of corporate behaviour. This contrast is well depicted by the differentiation between lobbying (short-term and object-specific) and interest representation (political influence) (Rival, 2015). A proof of a skilfully implemented strategic approach may be recognition by other actors in the setting who explicitly seek the company's expertise, regardless of the subject matter. The full-fledged approach perceives self-regulation as

strategic if implemented as a part of a comprehensive set of nonmarket actions submitted to explicit coordination and pursuing a predetermined goal.

3) Interrelations between various nonmarket activities of the firm

In light of the analysed nonmarket mechanisms and possible interactions in the nonmarket environment, another topic remains to consider: the interrelations between various nonmarket activities of the firm. In line with the typical mechanical patterns, nonmarket mechanisms based on firm self-regulation may bring the following types of effects concerning other nonmarket activities: (1) the spill over effect, (2) the compensation effect, and (3) the crowding-out effect (Levy, 2013). The description and examples of effects in relation to voluntary corporate engagement are presented in the table below.

Table 32. Effects in mechanical patterns applied to self-regulation as a nonmarket strategy

Type of effect	Description	Self-regulation effect in the nonmarket environment	Strategic perspective
Spill over effect	Coherent behaviour in different conditions or situations.	Once a company determines self-regulation as viable nonmarket activity and correctly identifies available capabilities, it becomes more inclined to capitalize on self-regulation regardless of the situation specificity.	Transforming political activity into a nonmarket strategy
Compensation effect	Counterbalancing the behaviour when an impossibility to act in one situation reinforces the need to act elsewhere.	A firm offset the impossibility of direct lobbying on political decision-makers by using self-regulation to weaken the lobbying strategy of its opponents	Accommodating various activities to reinforce the overall impact
Crowding-out effect	Acting in some situations is at the expense of acting elsewhere.	A firm decides to follow an individual voluntary commitment instead of engaging in collective self-regulation	Choosing strategically between various nonmarket activities

Self-regulation seems to be closely related to other nonmarket activities, like lobbying or constituency building. Nonetheless, in previous research, some relations were only established *via* conceptual models and the complexity of intertwining mechanisms has not been studied comprehensively.

Given the findings from this empirical research, self-regulation is not a substitute for lobbying, as some may claim (Baron, 2014). However, as different lobbying strategies exist (Rival, 2012), a compensation effect between both can occur in a specific context. If voluntary commitment precedes a lobbying decision, it instead remains a means to change informational asymmetry dynamics (reinforce the credibility of own lobbying or weaken opponents' arguments). Regarding relations between a firm and stakeholders, self-regulation may support a constituency-building strategy and impact the interest group's creation. For instance, engaging with social partners on an issue allows for starting grassroots campaigns.

These suggest further research implications regarding the interrelations between various nonmarket activities and the strategic use of their combinations. A specific body of literature, linking CSR with corporate political activities (mostly lobbying), has emerged to investigate the issue (Frynas *et al.*, 2017; Lock and Seele, 2016, 2018; de los Reyes and Scholz, 2022; Rehbién and Schuler, 2015; Rival and Déjean, 2012), however, it was not the intention of this project to answer such a research question.

4) Integrated market and nonmarket strategies

Markets are inherently political, both because of their ties to the regulatory functions of the state and because of market failures that various actors may contest. Thus, firms operate in a competitive landscape that consists of the market and the nonmarket environment. The category of 'political actors' encompasses, first and foremost, the state (with its public institutions and agents) having the legitimacy to set and enforce regulations. As business prominence in contemporary politics has risen over the last decades, firms have become significant political actors, especially in the case of innovative companies (Attarça, Corbel, and Nioche, 2010), or when sustainability or environmental issues are at stake (Hahn and Pinkse, 2014). It is mainly a consequence of their active participation in political space, together with states and civil society (Willetts, 2010). As private companies play a role in the political arena, they participate in establishing public policy while simultaneously developing private institutions. They also engage in purposeful activities to influence their nonmarket environment and, more broadly, build an ecosystem in which they operate (Scherer *et al.*, 2014; Suarez, 1998). Nonetheless, some scholars argue that all firms are constantly both economic and political actors (Salorio *et al.*, 2005).

The results of this study support the idea that organisational self-regulation is a strategic management activity that improves operational performance, being in parallel applicable to the nonmarket environment. Some academics refuse to call 'self-regulation' an action that a company takes for economic reasons (improving resource efficiency or implementing minimum social standards to grow profits), considering them a “normal profit-maximizing behavior of private companies” (Maurer, 2017: 7). The evidence from this research points toward the idea that self-regulation put in place for market reasons can be leveraged to reply to the nonmarket pressure exerted by different actors and deal with nonmarket forces. Thus, it allows concluding that self-regulation constitutes an integrating element for market and nonmarket strategies.

Successful firms increasingly develop complementary market and nonmarket strategies (Bach & Allen, 2010), in a lower-order meaning that refers to the integration of simultaneous activities as a combination preventing inconsistency in firm operations. (Baron, 1995b). Xie and colleagues (2014) posit the second and higher-order meaning of integration as coordination with the following aspects: horizontal, vertical, and intentional. In the case of self-regulation, external horizontal coordination is understood as competitive interactions among a firm, its rivals and allies, and internal horizontal coordination, that is the coordination between firm's departments and staff responsible for business strategy, are of special interest. In general, corporate environmental initiatives tend to be closely integrated with other functional areas of a firm, such as research and development, production, and marketing, as it requires their support in terms of resources and capabilities (Christmann, 2004). Consequently, self-regulation is a factor of integration between the corporate voluntary social and environmental policies and other organizational functions.

The integration of political influence actions in the general strategy of the company is an issue at the heart of integrated strategies. For instance, Attarça and Corbel (2018), by analysing the dynamics between nonmarket activities and innovation strategies, showed how the political strategies (lobbying, strategic litigation, multi-sectoral voluntary engagements, and public relations) are mobilised by companies to strengthen or weaken the effect of intellectual property rights on an industry. Analysing self-regulation from the integrated strategy perspective suggests a conclusion that voluntary commitment *de facto* interlocks market and nonmarket features. It is an important component of a comprehensive strategy in areas where the market and socio-political considerations coincide and are directly related to the strategic success of the firm (Parnell, 2018).

The findings confirm that self-regulation remains an object of study at the crossroad of economic and social science, as economic actions remain embedded in the structure of social relations (Granovetter, 1985) and nonmarket mechanisms are necessary for improving the efficiency of market exchanges (Boddewyn, 2003). A detailed understanding of nonmarket mechanisms functioning helps to comprehend how influence actions can be integrated into the more global strategy.

6.1.2. Methodological contributions

Focusing on the nonmarket mechanism in this study allows the nonmarket strategy research field to move forward in a twofold manner. First, the notion of mechanism has not been mobilised coherently by nonmarket strategy researchers. Thus, it is relevant to develop a shared understanding of the concept and demonstrate its analytical utility. Second, the explanation with a mechanisms-based model allows us to broaden our knowledge of nonmarket strategies functioning and resulting interrelations. I believe that focusing on nonmarket strategy mechanisms is revelatory, in the sense that it enables reflection upon common elements of various nonmarket activities. Thus, it allows for moving forward in the nonmarket strategy research field and opens numerous new horizons for scientific research regarding integrated strategies.

Probably the major advantage of mechanism-based thinking is that it facilitates the dialogue between scholars with different backgrounds or using different research methodologies. The challenge of mechanism discovery remains in the interest of a mechanism-based approach to knowledge building: “The real achievement of mechanistic (...) explanation is (...) to get a story (...) that we can understand, manipulate and communicate, that we can use, and use collaboratively, to help us manipulate, control and predict the world - and lead science to better knowledge” (Illari, 2013: 253). This emphasizes common understanding as the main goal of mechanism-based model explanations.

The positivist research paradigm implies that knowledge accumulation is done through accretion. Of particular interest is the possibility to integrate knowledge from study to study, facilitating its accumulation and further extension, even across disciplines. The results of this research take the form of a collection of nonmarket mechanisms, adaptable to particular situations and contexts, and be seen as a toolbox of theoretical knowledge (Elster, 2015). Such a shared toolbox of mechanisms could provide the means to integrate the knowledge on nonmarket strategies generated within fields like political science, economy, and management. The various subfields could employ the same theoretical toolbox and develop it for further use beyond their research community. As notes Ylikorski “theoretical understanding of the social world accumulates when the number of known mechanisms increases or the understanding of particular mechanism schemes becomes more detailed. There is also room for progress via systematization; mechanism schemes should be mutually

compatible, so knowledge progresses as new ways of combining mechanism schemes are developed.” (Ylikoski, 2019: 17).

I believe that findings contribute to a better understanding of how empirically function nonmarket strategies, which is an essential step before further studies of nonmarket strategies using the quantitative method. Statistic evidence is used to (dis-)confirm that a strategy brings about the desired outcome, whereas mechanistic evidence concerns how it does so. Mechanistic evidence gives information about the strategy-outcome relationship regarding the entity's existence or nature and activities mediating the relation. Thus, mechanism schemes provide a panel of relevant elements explaining empirical facts and interests. As agreed by Kanol, it is helpful to justify better and explain the choice of variables used in the statistical models to link the strategies with their outcomes (Kanol, 2015). They are essential in constructing alternative causal scenarios and searching for evidence that could discriminate between them (Ylikoski, 2019).

The mechanism-based approach to knowledge generation is a valuable alternative to other approaches used in strategic studies. It has several advantages: it provides a detailed understanding of the phenomenon and represents the phenomenon of interest schematically but as realistically as possible. This method has practical applications to a longitudinal qualitative research strategy, seemingly to the processual studies but significantly differs from it in terms of results. Both highlight the importance of temporality, context, and power plays. However, a mechanism-based approach helps reduce complexity by omitting irrelevant elements and finding patterns necessary to formulate results as sequential steps. Moreover, one of three major approaches to conceptualizing the nonmarket (political and social) environment is the network approach (Lucea and Doh, 2012). Compared to network analysis used to identify the attributes of the stakeholders and the relationships that they establish among themselves., the mechanism-based approach allows taking into consideration not only the existence of linkages between entities but better comprehending the interactions at the heart of these connections. Indeed, social processes involve multiple agents, interdependencies, complex structural beliefs and expectations, and feedback processes that often unfold over a long time. A mechanisms-based approach can better capture this complexity and thus provide an adapted answer to the theorizing challenges.

6.1.3. Managerial contributions

This research is conducted as a "formative study" to help improve the strategic use of self-regulation by organizations while determining its impact on the nonmarket environment. In such studies, "it is more important to understand the process by which things happen in a particular situation than to measure outcomes rigorously" (Maxwell, 2008). Thanks to the understanding of nonmarket mechanisms functioning, this study is both explanatory and predictive, without relying on overreaching theories.

I believe that the knowledge generated from this study can be helpful to firms by explaining how to value their voluntary commitment upon public authorities and all interest groups engaged in the political and social arenas. Rising managerial awareness regarding the strategic dimension of voluntary commitment favour the selection of the most appropriate nonmarket strategy to tackle specific issues (Christmann and Taylor, 2002). The research demonstrates the potential influence channels while indicating the tactics to pursue in the nonmarket environment. Multiple tactics were outlined in the study and can serve as a benchmark. Also, a company can benefit from understanding that the resources and capabilities resulting from self-regulation allow acquiring valuable political assets if properly mobilised in the nonmarket environment.

Another managerial takeaway is that each mechanism allows a company to enter into relations with different types of stakeholders, namely the public, other organisations, or policy decision-makers. Thus, from the practical point of view, different corporate units, for instance, a directorate of communications, a foundation managing sponsorship activities, or a public affairs unit, can each privilege a specific mechanism to interact with the external environment. As the mechanisms are interrelated, it is necessary to ensure proper coordination in, on the one hand, implementing self-regulation and, on the other hand, using it more widely in the nonmarket environment.

The results suggest that self-regulation is a highly versatile nonmarket strategy due to its potential to transform various dimensions of the nonmarket environment. Paraphrasing "lobby, buy or sue" (de Figueiredo, 2009) by simply adding "or self-regulate" at the end seems to overlook its main characteristic and limits the room for action. Indeed, the possibility of mobilising self-regulation at different stages of the nonmarket issue life cycle opens a wide range of opportunities to impact its evolution and influence the outcome – from

the issue identification by acting upon its saliency, through the interest group formation and political bargain on the legislative arena, up to enforcement by executive agencies. In addition, at each stage company engages in political play with different nonmarket actors. Self-regulation significantly contributes to issue settlement between companies and pressure groups, including activists and NGOs. Further, while impacting the social actors' behaviour, self-regulation conduces to modification of policy decision-makers' positions. Its direct and indirect impact on other nonmarket actors' behaviour makes self-regulation a powerful and universal nonmarket strategy. Consequently, companies can conduct a nonmarket strategy according to the motto "lobby, buy or sue, while self-regulating".

6.2. Conclusions

Self-regulation is recognised as a common business practice and has attracted the interest of researchers in multiple domains, for instance, law, economy, and management. It is considered a business strategy which can provide a firm with an additional competitive advantage. However, self-regulation can be seen as a form of governance challenging conventional institutions by taking advantage of society's pluralism to moderate the logic of the market. Indeed, self-regulation influences the nonmarket environment, including its social and political components. Yet, research lacks an in-depth insight into how self-regulation modifies the nonmarket environment and alters other actors' behaviour in the complex system of market-nonmarket interactions.

The theoretical part exposes that self-regulation has not yet been established among nonmarket strategies. Also, scholars provide some evidence of mechanisms underlying the interaction in the nonmarket environment, but the usage of the "mechanism" concept in management research remains confusing. The present study responds to these two shortcomings by answering the question "**How does self-regulation operate as a particular nonmarket strategy?**".

The main interest of this research is to apply the nonmarket strategy perspective to the study of a self-regulation phenomenon. It is aimed at revealing the link between voluntary initiatives and the transformation of the nonmarket environment by exploring how the modification of the institutional context is brought through leveraging self-regulation. Research findings reveal the nonmarket mechanisms based on self-regulation and construct a model illustrating the interrelations between them. It is demonstrated that the **identified mechanisms - endorsing the voluntary commitment, transforming the geography of power, and shaping the legislation** - are complementary and not exclusive. All three share a common component part, namely organisational self-regulation as a mechanism's trigger. Nonetheless, following the activation phase, each develops in relation to different actors and impacts the nonmarket environment differently.

This study's findings indicate that self-regulation belongs to nonmarket strategies because of its drivers, functioning mode, and potential consequences. First, self-regulation is a nonmarket strategy, given its antecedents. One finds external pressure among the principal drivers and determinants for implementing self-regulation. Also, while considering the

existing self-regulation, it can be leveraged as a strategic response to multiple extrinsic forces.

Self-regulation helps to:

- mitigate social pressure by engaging with activists or NGOs,
- relief of indirect social pressure (social actors who expect politicians to restrict business activities),
- ease political pressure by exchanging with policy decision-makers calling on companies for specific behaviour), and
- moderate regulatory threat by participating in consultations on draft legislation.

Second, self-regulation is a nonmarket strategy through its functioning mode, knowing that the identified nonmarket mechanisms are not functionally equivalent and involve interacting with various stakeholders, including social and political actors. Leveraging self-regulation helps manage relations with other organizations while changing their perceptions and positioning regarding the issue at stake. Thus, it modifies existing power plays that result from such interactions. From the adopted nonmarket perspective, self-regulation triggers a mechanism through which the behaviour of individuals, groups and subsystems is altered to achieve a specific outcome. Third, the potential effects of self-regulation are observable in the nonmarket environment in a broad sense. The process of description and identification of three mechanisms allowed us for distinguishing between intermediary and final outcomes. The former takes various forms, from acquiring the social licence to operate, through coalition building, to thwarted legislative attempts. The latter is directly linked to the regulations (regulatory outcomes). For all the reasons mentioned above, there is no space for doubts as to including self-regulation among other nonmarket strategies.

Further, the contextual elements are critical to categorise self-regulation within nonmarket strategies. In general, voluntary corporate engagements are considered a proactive nonmarket strategy that allows for anticipating regulations. The general principle of self-regulation as a proactive nonmarket strategy is based on the assumption that the firm voluntarily commits to provide the externality in the expectation of being rewarded by relevant stakeholders (Dorobantu *et al.*, 2017). A proactive strategy focuses on planning ahead and addressing processes that help protect against potential adversity. However, as demonstrated, self-regulation can be analysed in the broader socio-political context. Considering self-regulation as a proactive strategy means reducing the understanding of the nonmarket environment to its legislative/regulatory dimension. The results suggest that

leveraging self-regulation as a nonmarket strategy pertains instead to the reactive category since it is mobilized as a reply to external social or political pressure. The voluntary corporate commitment may be former to legislative attempts in a case when its implementation has been undertaken exclusively for business reasons. Its subsequent mobilisation in the nonmarket environment results from external pressure.

In any manner, as long as self-regulation remains covert for other nonmarket actors, it shall not be considered a nonmarket strategy. Self-regulation is commonly considered as “non-bargaining” avoidance behaviour to buffer the company from external pressure, *e.g.* regulatory uncertainty or coercive regulation (Engau and Hoffmann, 2011; Salorio *et al.*, 2005), and to amplify the organisation’s protecting boundaries. On the contrary, the results show that self-regulation as a nonmarket strategy is rather mobilised by companies to enter into relations with other entities. Thus, it can be classified as a relationship-oriented and action-based bridging strategy aimed at creating conditions for synergy between all actors in the ecosystem, through a strategic network. Further, management scholars developed nonmarket strategy classifications according to at least three criteria: (1) the mobilized assets - informational, financial, and relational (Hillman and Hitt, 1999), (2) the arena - political strategies, social strategies (Husted and Allen, 2007), and legal strategies (Casarin, 2015), (3) the issue at stake - social, or environmental strategies (Delmas and Toffel, 2008). As versatile as it is, self-regulation remains difficult to unequivocally categorize, at least within existing frameworks. Overall, multiple overlapping classifications make it challenging to properly locate self-regulation in the panoply of nonmarket strategies unless one would place it in several categories at once. *De facto*, it may be considered congruently informational and relational, while activated in different arenas at the same time.

As demonstrated in the findings, by leveraging self-regulation in the nonmarket environment to activate the three identified mechanisms, it becomes possible for a company to interact with multiple actors. A detailed analysis of mechanisms and their functioning modes allows a better comprehension of how the nonmarket environment is transformed by the firm voluntary commitment and enlightens the complex market-nonmarket dynamics that the implementation of self-regulation induces in the various arenas. One can further conclude that the strategy research has much to gain in analysing the nonmarket environment in a more systemic way, rather than focusing on bilateral relations between specific actors or a mutual impact between a firm (its performance, resources and competencies, *etc.*) and regulations

(characterised by flexibility, uncertainty, enforcement, *etc.*). In fact, organisations adapt their nonmarket strategies to multiple contextual factors, often in a dynamic context.

This thesis identifies drivers and determinants of self-regulation, together with the issue-related, external and internal factors that impact the probability of leveraging self-regulation in the nonmarket environment. This knowledge can guide the managerial decision for engaging and implementing an optimal influence policy adjusted to evolving situations and different conditions.

The mobilisation of a mechanism-based approach allows for determining interrelations between component parts of the broader socio-political environment. It further confirms the interest in elaborating a comprehensive approach to nonmarket issue management, taking into consideration multiple factors: the firm's characteristics, internal and external drivers, stakeholders' positioning in a political bargain and their nonmarket strategies, issue life cycle, and all available options regarding nonmarket activities, that can be used to reinforce the firm's corporate strategy.

6.3. Limits and extentions

6.3.1. Limits

One may argue that the best research results are covering-law explanations. Since in the complex, nonmarket environment the same action may bring contradictory results (through actioning one of several possible mechanisms), it seems justified not to look for general laws resulting from the self-regulation phenomenon. Quite the opposite, unveiling what happens ‘in the black box’ through the identification of specific nonmarket mechanisms rises the explanatory predictability and utility of the study. However, mechanism discovery is gradual, with no clear distinction between partial and complete descriptions of mechanisms. It is satisfactory to the point where the understanding of the actual operating mechanism is achieved, as I believe is the case of the presented results.

The current study is limited by the empirical setting, what become evident as the research was in progress and some adjustments intervened. First of all, the data collection period partially covered the Covid-19 crisis. Knowing that the food retail sector was particularly exposed to its consequences (the companies and stores had to continue to operate while adapting to particularly stringent sanitary restrictions), the public health policy was prioritised over waste prevention. Certain practices were modified, or even (temporarily) abandoned. It was more difficult to access internal data and some interlocutors. Thus, the temporary scope retained for the study is from 2009 to 2019.

A consequence of such a study’s timeframe is the fact that different trajectories are not equivalent to one another. Whereas some develop in a similar context and allow direct analogies between companies’ nonmarket strategies, they remain eclectic in terms of the duration (between 1 year for food donations to over 10 years for plastic policy). Consequently, the highlights are precisely determined, but the secondary details gathered on each may differ. Thus, the temporary notion is entirely left out in the research for patterns. Its principal shortcoming is that adopting a different timeframe could bring other results. For instance, for the three trajectories where the regulatory threat does not appear, it may remain only a matter of time. With the different temporary horizons of the study, the nonmarket issue could attract more political attention and ultimately become regulated after 2020.

Another limit rises from the necessity to reconstruct cases of self-regulation mobilisation in the nonmarket environment. The information regarding the corporate intentions and objectives of self-regulation can be biased. I gathered data from various sources to triangulate them and make the evidence more reliable. However, the data on lobbying activities were not analysed to confront other sources of information, due to the incompleteness of information available through the French transparency register. Also, as long as the press review is concerned, the collect of data showed that the media interest in waste prevention and management issues, and consequently the public interest, has significant growth with time. Consequently, the volume of data collected for different trajectories is not equal due to the public and political interest in the issue, as well as the duration of the issue settlement.

The limits regarding the generalisation of results from this study originate in its research design (exploratory case study) and adapted mechanism-based method. Indeed, direct empirical generalization from case studies is tricky, and the mechanism-based approach does not change this widely acknowledged fact. Exploratory studies usually are based on a modest number of samples that may not adequately represent the target population. Accordingly, the findings of exploratory research cannot be generalized to a wider population. The sample of two organizations may seem restrained, yet, diverse projects remain the main analytical units, which rises the number of studied cases to ten. The mechanism-based approach is “more circumspect with respect to direct empirical generalizations and extrapolations” (Ylikoski, 2019: 17). Explanatory precision of mechanisms is limited to a specific range of phenomena (Hedström and Swedberg, 1998). While the analytical process focused on mechanism identification necessarily entails simplification, the nonmarket strategy mechanisms determined in this study are characterised by the high probability to be perceived in other empirical settings. Also, generalization involves investigating both the similarity of new exemplars to those already studied and the variations between them. The details provided on each mechanisms allow such comparisons in future.

6.3.2. Extensions

This section outlines future research paths regarding self-regulation as a nonmarket strategy and the possible extensions of the applied mechanisms-based research method.

Future studies may continue to analyse self-regulation characteristics from the nonmarket perspective. For that, a series of issues need to be addressed:

(1) The risk of misappropriation – are the gains from pursuing organizational self-regulation as a non-market strategy obtained only by a company? Do other actors benefit from such a strategy? If yes, is it (dis-)advantageous and for whom?

(2) Persistence, imitability, and retaliation - what features make organizational self-regulation distinctive non-market strategy? Under what conditions can organizational self-regulation as a non-market strategy become a source of long-term competitive advantage? How could self-regulation be counterbalanced?

As far as the strategic dimension of self-regulation is concerned, it would be interesting to inquire how self-regulation is enacted internally as a nonmarket strategy (Jarzabkowski, Kavas, and Krull, 2021). Even though implementing any nonmarket strategy requires functioning adaptation, it seems evident that self-regulation impacts an internal organizational practice more significantly than most political activities, which are inherently externally oriented. Moreover, the in-depth analysis of how a company “strategises” self-regulation by mobilising in the nonmarket would clarify whether the voluntary commitment is a deliberate or emergent nonmarket strategy.

The question of intentionality has not been raised in this research. Corporate political activity is any intentional business effort to influence public or quasi-public policies (Hilman et al., 2004). Nonetheless, political influence does not equal political strategy, as the former may appear without conscious intention or concerted effort (Springuel, 2011), whether the latter reveals the intentional allocation of resources and choice of activity to be conducted. Contrarily, strategy can also be considered a phenomenon resulting from *ad hoc* incremental decisions that only cohere into a recognizable pattern (Mintzberg, 2007). Given the contributions outlined above in section 6.1.1. “Nonmarket activity, tactic, or strategy”, the question of strategic intent and identification of precise conditions when a nonmarket activity becomes strategic requires further clarification.

Regarding the research interest in nonmarket mechanisms, this exploratory qualitative research can be expanded twofold:

(1) into a qualitative study to provide in-depth findings in another context and possibly enrich the knowledge regarding identified mechanisms, and

(2) into a study based on different methods to validate the findings.

First, it would be necessary to answer if the nonmarket mechanisms were identified exhaustively in the current study and possibly what are other nonmarket mechanisms specific to self-regulation. Schmid and colleagues recently identified a mechanism based on a technological change through which private regulation (taking the form of product labelling) influences public regulation (Schmid *et al.*, 2021). This exploratory study of regulatory instrument interactions may inspire further research conducted from the point of view of corporate management and strategy instead of a public policy perspective. Second, to refine the model of relationships between the identified nonmarket mechanisms, it would be possible to conduct a study by applying, for instance, a Qualitative Comparative Analysis method (Ragin, 1987).

Regarding the applied approach by the mechanisms, it is possible to develop the research strategy (Wight, 2015) for further extensions of the proposed model. Consecutive stages may be devoted to discovering the expected outcomes of activating specific nonmarket mechanisms and how they might be measured, as well as the identification of alternative contexts within which the mechanism could be operative. Also, analyses that contrast the adoption of distinct nonmarket strategies by a company can provide more nuanced views of the operating nonmarket mechanisms and their impact.

Finally, exploring empirically nonmarket mechanisms activated by various actors, not only firms, would be interesting to confront the results and further distinguish the specificities of nonmarket strategies applied by different entities. Indeed, recently a debate has arisen in France regarding the influence of NGOs considered the “6th power”³⁹. The question of the weight of associations and NGOs in the public debate and in the nonmarket issues-settlement is interesting and shows that they are part of the democratic and political landscape. Multiple studies analyse models of such interactions (Abito, Besanko, and Diermeier, 2016; Baron *et al.*, 2016; Lyon and Maxwell, 2004); however, management studies lack their confirmation

³⁹ « ONG, Le Sixième pouvoir », source: https://lexpansion.lexpress.fr/actualite-economique/le-vrai-pouvoir-des-ong-en-france-le-dossier-de-l-express_2178655.html, retrieved on Sept, 15th 2022.

“in vivo”. Therefore, it seems essential to reveal and understand, thanks to future research, the complex nonmarket interactions and consider systemic dynamics between various market, social and political actors.

REFERENCES

- Abito JM, Besanko D, Diermeier D. 2016. Corporate reputational dynamics, private regulation, and activist pressure. *Advances in Strategic Management* **34**: 235–299.
- Ahuja G, Capron L, Lenox MJ, Yao DA. 2018. Strategy and the Institutional Envelope. *Strategy Science* **3**(2): ii–x.
- Albareda L. 2008. Corporate responsibility, governance and accountability: from self-regulation to co-regulation. *Corporate Governance: The international journal of business in society* **8**(4): 430–439.
- Aliyu AA, Bello MU, Kasim R, Martin D. 2014. Positivist and Non-Positivist Paradigm in Social Science Research: Conflicting Paradigms or Perfect Partners? *Journal of Management and Sustainability* **4**(3): 79–95.
- Ambec S, Lanoie P. 2008. Does It Pay to Be Green? A Systematic Overview. *Academy of Management Perspectives* **22**(4): 45–62.
- Ansari SM, Fiss PC, Zajac ZJ. 2010. Made to fit: How practices vary as they diffuse. *Academy of Management Review* **35**(1): 67–92.
- Anton WRQ, Deltas G, Khanna M. 2004. Incentives for environmental self-regulation and implications for environmental performance. *Journal of Environmental Economics and Management* **48**(1): 632–654.
- Aravind D, Christmann P. 2011. Decoupling of Standard Implementation from Certification: Does Quality of ISO 14001 Implementation Affect Facilities' Environmental Performance? *Business Ethics Quarterly* **21**(1): 73–102.
- Atkinson S, Schaefer A, Viney H. 2000. Organizational structure and effective environmental management. *Business Strategy and the Environment* **9**(2): 108–121.
- Attarça M. 2007. L'utilisation de la communication et de l'information dans les démarches de lobbying des entreprises: enjeux managériaux et sociétaux. *Revue Française de Marketing* **211**(1/5): 65–92.
- Attarça M, Corbel P. 2018. Propriété intellectuelle & capture des rentes d'innovation : un pas de plus dans l'intégration des actions d'influence politique dans la stratégie générale de l'entreprise. *Finance Contrôle Stratégie* (NS-3).
- Attarça M, Corbel P, Nioche J-P. 2010. Innovation et politiques d'influence. Un essai de typologie. *Revue française de gestion* **36**(206): 31–47.
- Avenier M, Thomas C. 2015. Finding one's way around various methodological guidelines for doing rigorous case studies: A comparison of four epistemological frameworks. *Systèmes d'information & management* **20**(1): 61–98.
- Bach D. 2010. *Analyzing The Nonmarket Environment of Business: The (ia) 3 - Framework*. IEPublishing, IE Publishing - technical note. Available at: <https://iepublishing.ie.edu/en/analyzing-the-nonmarket-environment-of-business-the-ia-3-framework>.
- Bach D, Allen DB. 2010. What every CEO needs to know about nonmarket strategy. *MIT*

- Sloan Management Review* **51**(3): 41–48.
- Bach D, Blake DJ. 2016. Frame or Get Framed: the Critical Role of Issue Framing in Nonmarket Management. *California Management Review* **58**(3): 66–88.
- Backman CA, Verbeke A, Schulz RA. 2017. The Drivers of Corporate Climate Change Strategies and Public Policy. *Business & Society* **56**(4): 545–575. Available at: <http://journals.sagepub.com/doi/10.1177/0007650315578450>.
- Banerjee SB, Iyer ES, Kashyap RK. 2003. Corporate environmentalism: Antecedents and influence of industry type. *Journal of Marketing* **67**(2): 106–122.
- Barbat G, Bressolles G, André JM. 2012. Quel cadre d'analyse pour les démarches environnementales de la grande distribution? *Revue Francaise de Gestion* **225**(6): 13–26.
- Barnett ML, King AA. 2008. Good Fences Make Good Neighbors : A Longitudinal Analysis of an Industry Self- Regulatory Institution. *The Academy of Management Journal* **51**(6): 1150–1170.
- Baron DP. 1995a. Integrated Strategy: Market and Nonmarket components. *California Management Review* **37**(2): 47–66.
- Baron DP. 1995b. The Nonmarket Strategy System. *Sloan Management review* **31**(1): 73–85.
- Baron DP. 2001. Private Politics, Corporate Social Responsibility, and Integrated Strategy. *Journal of Economics & Management Strategy* **10**(1): 7–45.
- Baron DP. 2016. Self-Regulation and the Market for Activism. *Journal of Economics and Management Strategy* **25**(3): 584–607.
- Baron DP, Harjoto MA, Hoje J. 2011. The Economics and Politics of Corporate Social Performance. *Business & Politics* **13**(2): 1–46.
- Baron DP, Neale M, Rao H. 2016. Extending Nonmarket Strategy: Political Economy and the Radical Flank Effect in Private Politics. *Strategy Science* **1**(2): 105–126.
- Bartley T. 2007. Institutional Emergence in an Era of Globalization: The Rise of Transnational Private Regulation of Labor and Environmental Conditions. *American Journal of Sociology* **113**(2): 297–351.
- Baumber A, Scerri M, Schweinsberg S. 2019. A social licence for the sharing economy. *Technological Forecasting and Social Change*. Elsevier **146**(May): 12–23.
- Baysinger BD. 1984. Domain Maintenance as an Objective of Business Political Activity: An Expanded Typology. *Academy of Management Review* **9**(2): 248–258.
- Bechtel W, Abrahamsen A. 2005. Explanation: A mechanist alternative. *Studies in History and Philosophy of Biological and Biomedical Sciences* **36**(2 SPEC. ISS.): 421–441.
- Berrone P, Fosfuri A, Gelabert L. 2017. Does Greenwashing Pay Off? Understanding the Relationship Between Environmental Actions and Environmental Legitimacy. *Journal of Business Ethics* **144**(2): 363–379.
- Berrone P, Fosfuri A, Gelabert L, Gomez-Mejia LR. 2013. Necessity as the Mother of 'Green' Inventions: Institutional Pressures and Environmental Innovations. *Strategic Management Journal* **34**: 891–909.
- Berry J-B. 2006. Innovation et marchés de la grande distribution. *Le commerce en France*,

Insee : 17–27.

- Bikhchandani S, Hirshleifer D, Welch I. 1992. A Theory of Fads, Fashion, Custom, and Cultural Change as Informational Cascades. *Journal of Political Economy* **100**(5): 992–1026.
- Black J. 2001. Decentring Regulation : Understanding the Role Self-Regulation in a ' Post-Regulatory ' World. *Current Legal Problems* **54**(1): 103–146.
- Boddeyn JJ. 2003. Understanding and Advancing the Concept of 'Nonmarket'. *Business & Society* **42**(3): 297–327.
- Boddeyn JJ, Doh JP. 2011. Global strategy and the collaboration of MNEs, NGOs, and governments for the provisioning of collective goods in emerging markets. *Global Strategy Journal* **1**(3–4): 345–361.
- Bogen J. 2005. Regularities and causality; generalizations and causal explanations. *Studies in History and Philosophy of Biological and Biomedical Sciences* **36**(2 SPEC. ISS.): 397–420.
- Boiral O. 2012. ISO Certificates as Organizational Degrees? Beyond the Rational Myths of the Certification Process. *Organization Studies* **33**(5–6): 633–654.
- Bonardi J-P, Keim GD. 2005. Corporate Political Strategies for Widely Salient Issues. *Academy of Management Review* **30**(3): 555–576.
- Bonica A. 2014. Avenues of Influence: On the Political Expenditures of Corporations and Their Directors and Executives. *Working paper* **18**(4): 367–394.
- Le Bot C, Perrigot R, Déjean F, Oxibar B. 2022. Corporate Social Responsibility in franchise chains: Specificities, insights from French franchise chains' CSD, and avenues for future research. *Journal of Retailing and Consumer Services* **66**: 102945.
- Bowen F. 2019. Marking Their Own Homework: The Pragmatic and Moral Legitimacy of Industry Self-Regulation. *Journal of Business Ethics*. Springer Netherlands **156**(1): 257–272.
- Bowen F, Aragon-Correa JA. 2014. Greenwashing in Corporate Environmentalism Research and Practice: The Importance of What We Say and Do. *Organization and Environment* **27**(2): 107–112.
- Breitinger D, Bonardi J-P. 2016. Private Politics Daily: What Makes Firms the Target of Internet/Media Criticism? An Empirical Investigation of Firm, Industry, and Institutional Factors. *Strategy Beyond Markets* **34**: 331–363.
- Briscoe F, Safford S. 2008. The Nixon-in-China Effect: Activism, Imitation, and the Institutionalization of Contentious Practices Forrest. *Administrative Science Quarterly* **53**: 460–491.
- Bromiley P, Johnson S. 2005. Mechanisms and Empirical Research **2**(05): 15–29.
- Brown RS. 2016. How do firms compete in the non-market? The process of political capability building. *Business and Politics* **18**(3): 263–295.
- Brunsson N, Rasche A, Seidl D. 2012. The Dynamics of Standardization: Three Perspectives on Standards in Organization Studies. *Organization Studies* **33**(5–6): 613–632.

- Buisman ME *et al.* 2019a. The dark side of retail food waste: Evidences from in-store data. *Global Food Security*. Elsevier Ltd **20**(3): 944–956.
- Buisman ME, Haijema R, Bloemhof-Ruwaard JM. 2019b. Discounting and dynamic shelf life to reduce fresh food waste at retailers. *International Journal of Production Economics*. Elsevier Ltd **209**(July 2017): 274–284.
- Büthe T. 2010. Global private politics: A research agenda. *Business and Politics* **12**(3): 1–24.
- Buysse K, Verbeke A. 2003. Proactive environmental strategies: A stakeholder management perspective. *Strategic Management Journal* **24**(5): 453–470.
- Cafaggi F, Janczuk A. 2010. Private regulation and legal integration: The european example. *Business and Politics* **12**(3): 1–40.
- Calveras A, Ganuza JJ, Llobet G. 2007. Regulation, corporate social responsibility and activism. *Journal of Economics and Management Strategy* **16**(3): 719–740.
- Capano G, Howlett M, Ramesh M, Virani A. 2019. *Making Policies Work First- and Second-order Mechanisms in Policy Design*. Edward Elgar Publishing.
- Carlos WC, Lewis BW. 2018. Strategic Silence: Withholding Certification Status as a Hypocrisy Avoidance Tactic. *Administrative Science Quarterly* **63**(1): 130–169.
- Castka P, Prajogo D. 2013. The effect of pressure from secondary stakeholders on the internalization of ISO 14001. *Journal of Cleaner Production*. Elsevier Ltd **47**: 245–252. Available at: <http://dx.doi.org/10.1016/j.jclepro.2012.12.034>.
- Christmann P. 2004. Multinational companies and the natural environment: Determinants of global environmental policy standardization. *Academy of Management Journal* **47**(5): 747–760.
- Christmann P, Taylor G. 2002. Globalization and the environment: Strategies for international voluntary environmental initiatives. *Academy of Management Executive* **16**(3): 121–135.
- Christmann P, Taylor G. 2006. Firm self-regulation through international certifiable standards: Determinants of symbolic versus substantive implementation. *Journal of International Business Studies* **37**(6): 863–878.
- Cicatiello C, Franco S, Pancino B, Blasi E. 2016. The value of food waste: An exploratory study on retailing. *Journal of Retailing and Consumer Services*. Elsevier **30**: 96–104.
- Cicatiello C, Franco S, Pancino B, Blasi E, Falasconi L. 2017. The dark side of retail food waste: Evidences from in-store data. *Resources, Conservation and Recycling*. Elsevier **125**(June): 273–281.
- Clark CE, Crawford EP. 2012. Influencing Climate Change Policy : The Effect of Shareholder Pressure and Firm Environmental Performance. *Business & Society* **51**(1): 148–175.
- Cliquet G, Picot-Coupey K, Basset G, Perrigot R. 2008. Retailing in France: Overview and Key Trends / What's up? *European Retail Research* **22**: 177–206.
- Coglianesi C, Mendelson E. 2010. Meta-Regulation and Self-Regulation. In *The Oxford Handbook on Regulation*, Cave M, Baldwin R, Lodge M (eds): 146–168.
- Colla E. 2006. Distorted competition: Below-cost legislation, ‘marges arrière’ and prices in French retailing. *International Review of Retail, Distribution and Consumer Research*

16(3): 353–373.

- Colwell SR, Joshi AW. 2013. Corporate Ecological Responsiveness: Antecedent Effects of Institutional Pressure and Top Management Commitment and Their Impact on Organizational Performance. *Business Strategy and the Environment* **22**(2): 73–91.
- Corrado S *et al.* 2019. Food waste accounting methodologies: Challenges, opportunities, and further advancements. *Global Food Security*. Elsevier B.V. **20**: 93–100.
- Craver CF, Bechtel W. 2007. Top-down causation without top-down causes. *Biology and Philosophy* **22**(4): 547–563.
- Cuervo-Cazurra A, Mudambi R, Pedersen T. 2019. Clarifying the relationships between institutions and global strategy. *Global Strategy Journal* **9**(2): 151–175.
- Curchod C, Patriotta G, Wright M. 2020. Self-categorization as a nonmarket strategy for MNE subsidiaries: Tracking the international expansion of an online platform. *Journal of World Business*. Elsevier **55**(3): 101070.
- Curran L, Eckhardt J. 2020. Mobilizing against the Antiglobalization Backlash: An Integrated Framework for Corporate Nonmarket Strategy. *Business and Politics* **22**(4): 612–638.
- Darnall N, Aragón-Correa JA. 2014. Can Ecolabels Influence Firms' Sustainability Strategy and Stakeholder Behavior? *Organization & Environment* **27**(4): 319–327.
- Darnall N, Carmin J. 2005. Greener and Cleaner? The Signaling Accuracy of U . S . Voluntary Environmental Programs. *Policy Sciences* **38**(2/3): 71–90.
- Darnall N, Jolley J, Handfield R. 2008. Environmental Management Systems and Green Supply Chain Management: Complements for Sustainability? *Business Strategy and the Environment* **18**: 30–45.
- Dashwood HS. 2014. Sustainable Development and Industry Self-Regulation: Developments in the Global Mining Sector. *Business and Society* **53**(4): 551–582.
- Dean TJ, Brown RL. 1995. Pollution Regulation as a Barrier to New Firm Entry: Initial Evidence and Implications for Future Research. *Academy of Management Journal* **38**(1): 288–303.
- Deephouse DL. 1999. To be different or to be the same? It's a question (and theory) of strategic balance. *Strategic Management Journal* **20**(2): 147–166.
- Dekhili S. 2016. Les enseignes de la grande distribution : quelle légitimité pour commercialiser des produits écologiques du point de vue des consommateurs ? *Management & Avenir* **87**(5): 55.
- Delmas MA, Burbano VC. 2011. From Greenwash to Great . *California Management Review* **54**(1): 64–87.
- Delmas MA, Hoffmann VH, Kuss M. 2011. *Under the Tip of the Iceberg: Absorptive Capacity, Environmental Strategy, and Competitive Advantage*. *Business & Society*, 50.
- Delmas MA, Lim J, Nairn-Birch N. 2016. Corporate environmental performance and lobbying. *Academy of Management Discoveries* **2**(2): 1–23.
- Delmas MA, Lyon TP, Maxwell JW. 2019. Understanding the Role of the Corporation in Sustainability Transitions. *Organization and Environment* **32**(2): 87–97.

- Delmas MA, Montes-Sancho MJ. 2010. Voluntary agreements to improve environmental quality: Symbolic and substantive cooperation. *Strategic Management Journal* **31**(6): 575–601.
- Delmas MA, Montiel I. 2008. The Diffusion of Voluntary International Management Standards : Responsible Ca ... **36**(1): 65–94.
- Delmas MA, Terlaak AK. 2001. A Framework for Analyzing Environmental Voluntary Agreements. *California Management Review* **43**(3): 44–63.
- Delmas MA, Toffel MW. 2004. Stakeholders and environmental management practices: An institutional framework. *Business Strategy and the Environment* **13**(4): 209–222.
- Delmas MA, Toffel MW. 2008. Organizational Responses to Environmental Demands: Opening the Black Box. *Strategic Management Journal* **29**: 1027–1055.
- DeMarzo PM, Fishman MJ, Hagerty KM. 2005. Self-Regulation and Government Oversight. *Review of Economic Studies* **72**: 687–706.
- Demirel P, Iatridis K, Kesidou E. 2018. The impact of regulatory complexity upon self-regulation: Evidence from the adoption and certification of environmental management systems. *Journal of Environmental Management* **207**: 80–91.
- Denicolò V. 2008. A signaling model of environmental overcompliance. *Journal of Economic Behavior and Organization* **68**(1): 293–303.
- Dixon-Fowler HR, Slater DJ, Johnson JL, Ellstrand AE, Romi AM. 2013. Beyond ‘Does it Pay to be Green?’ A Meta-Analysis of Moderators of the CEP-CFP Relationship. *Journal of Business Ethics* **112**(2): 353–366.
- Dobbin F, Sutton JR, Meyer JW, Scott R. 1993. Equal Opportunity Law and the Construction of Internal Labor Markets. *The American Journal of Sociology* **99**(2): 396–427.
- Doh JP, Lawton TC, Rajwani T. 2012. Advancing Nonmarket Strategy Research: Institutional Perspectives in a Changing World. *Academy of Management Perspectives* **26**(3): 22–39.
- Doh JP, McGuire S, Ozaki T. 2015. The Journal of World Business Special Issue: Global governance and international nonmarket strategies: Introduction to the special issue. *Journal of World Business*. Elsevier Inc. **50**(2): 256–261.
- Dorobantu S, Kaul A, Zelner BA. 2017. Nonmarket Strategy Research Through the Lens of New Institutional Economics: an Integrative Review and Fututre Directions. *Academy of Management Journal* **38**: 114–140.
- Dowling GR. 1993. Developing your company image into a corporate asset. *Long Range Planning* **26**(2): 101–109.
- Dreyer HC, Dukovska-Popovska I, Yu Q, Hedenstierna CP. 2019. A ranking method for prioritising retail store food waste based on monetary and environmental impacts. *Journal of Cleaner Production*. Elsevier Ltd **210**: 505–517.
- Dubé L, Paré G. 2003. Rigor in information systems positivist case research: Current practices, trends, and recommendations. *MIS Quarterly: Management Information Systems* **27**(4): 597–635.
- van Eck D. 2015. Reconciling Ontic and Epistemic Constraints on Mechanistic Explanation, Epistemically. *Axiomathes* **25**(1): 5–22.

- Eden S. 1997. Regulation, Self-regulation and Environmental Consensus : Lessons From the UK Packaging Waste Experience. *Business Strategy & the Environment* **6**: 232–241.
- Egorov G, Harstad B. 2017. Private politics and public regulation. *Review of Economic Studies* **84**(4): 1652–1682.
- Egri CP, Herman S. 2000. Leadership in the North American environmental sector: Values, leadership styles, and contexts of environmental leaders and their organizations. *Academy of Management Journal* **43**(4): 571–604.
- Eisenhardt KM. 1989. Building Theories from Case Study Research. *The Academy of Management Review* **14**(4): 532–550.
- Eisenhardt KM, Graebner ME. 2007. Theory building from cases: Opportunities and challenges. *Academy of Management Journal* **50**(1): 25–32.
- Eisner MA. 2004. Corporate Environmentalism, Regulatory Reform, and Industry Self-Regulation: Toward Genuine Regulatory Reinvention in the United States. *Governance: An International Journal of Policy, Administration, and Institutions* **17**(2): 145–167.
- Elster J. 1998. A Plea for Mechanisms. In *Social Mechanisms: An Analytical Approach to Social Theory*, Hedström P, Swedberg R (eds). Cambridge University Press: 45–73.
- Emeseh E, Ako R, Okonmah P, Obokoh, Ogechukwu L. 2010. Corporations, CSR and Self Regulation: What Lessons from the Global Financial Crisis? *German Law Journal* **11**(2): 230–259.
- Fasterling B. 2012. Development of Norms Through Compliance Disclosure. *Journal of Business Ethics* **106**(1): 73–87.
- Favotto A, Kollman K. 2021. Mixing business with politics: Does corporate social responsibility end where lobbying transparency begins? *Regulation and Governance* **15**(2): 262–279.
- Ferrón Vílchez V. 2017. The dark side of ISO 14001: The symbolic environmental behavior. *European Research on Management and Business Economics*. AEDEM **23**(1): 33–39.
- de Figueiredo JM. 2009. *Integrated political strategy*. *Advances in Strategic Management*. Elsevier, 26.
- De Figueiredo JM. 2002. Lobbying and Information in Politics. *Business & Politics* **4**(2): 125–130.
- de Figueiredo JM, Silverman BS. 2006. Academic Earmarks and the Returns to Lobbying. *The Journal of Law & Economics* **49**(2): 597–625.
- Filimonau V, Gherbin A. 2018. An exploratory study of food waste management practices in the UK grocery retail sector. *Journal of Cleaner Production* **167**: 1184–1194.
- Floridi L. 2021. The End of an Era: from Self-Regulation to Hard Law for the Digital Industry. *Philosophy and Technology*. Springer Netherlands **34**(4): 619–622.
- Fremeth A, Richter BK. 2011a. Profiting from Environmental Regulatory Uncertainty: Integrated Strategies for Competitive Advantage. *California Management Review* **54**(1): 145–165.
- Fremeth AR, Holburn GLF, Vanden Bergh RG. 2016. Corporate Political Strategy in

- Contested Regulatory Environments. *Strategy Science* **1**(4): 272–284.
- Fremeth AR, Richter BK. 2011b. Profiting from Environmental Regulatory Uncertainty: *California Management Review* **54**(1): 145–165.
- Frynas JG, Child J, Tarba SY. 2017. Non-market Social and Political Strategies – New Integrative Approaches and Interdisciplinary Borrowings. *British Journal of Management* **28**(4): 559–574.
- Funk RJ, Hirschman D. 2017. Beyond Nonmarket Strategy: Market Actions As Corporate Political Activity. *Academy of Management Review* **42**(1): 32–52.
- Garreau L. 2020. Petit précis méthodologique. *Le Libellio d’AEGIS* **16**(2): 51–64.
- Garvin DA. 1983. Can Industry Self-Regulation Work? *California Management Review* **25**(4): 37–52.
- Gatti L, Seele P, Rademacher L. 2019. Grey zone in – greenwash out. A review of greenwashing research and implications for the voluntary-mandatory transition of CSR. *International Journal of Corporate Social Responsibility*. *International Journal of Corporate Social Responsibility* **4**(1): 1–15.
- Getz KA. 2002. Public affairs and political strategy: Theoretical foundations. *Journal of Public Affairs* **1**(4): 305–329.
- Ghosh R, Eriksson M. 2019. Food waste due to retail power in supply chains: Evidence from Sweden. *Global Food Security* **20**: 1–8.
- Giuliano G, Linder A. 2013. Motivations for self-regulation: The clean air action plan. *Energy Policy* **59**: 513–522.
- Glennan S. 2005. Modeling mechanisms. *Studies in History and Philosophy of Science Part C :Studies in History and Philosophy of Biological and Biomedical Sciences* **36**(2 SPEC. ISS.): 443–464.
- Gond J-P, Matten D. 2007. Rethinking the Business Society Interface: Beyond the Functionalist Trap. *ICCSR Research Paper Series* **44**(47): 1–48.
- Gond JP, Kang N, Moon J. 2011. The government of self-regulation: On the comparative dynamics of corporate social responsibility. *Economy and Society* **40**(4): 640–671.
- González-Benito J, González-Benito Ó. 2006. A review of determinant factors of environmental proactivity. *Business Strategy and the Environment* **15**(2): 87–102.
- Gorostidi-Martinez H, Zhao X. 2017. Corporate political strategies: a contemporary literature review. *Journal of Advances in Management Research* **14**(3): 375–404.
- Graafland JJ, Smid H. 2004. *Reputation , corporate social responsibility and market regulation*. MPRA Paper No. 20772.
- Grandori A. 1997. An organizational assessment of interfirm coordination modes. *Organization Studies* **18**(6): 897–925.
- Granovetter M. 1985. Economic Action and Social Structure: the Problem of Embeddedness. *American Journal of Sociology* **91**(3): 481–510.
- Greening DW., Gray B. 1994. Testing a Model of Organizational Response to Social and Political Issues. *The Academy of Management Journal* **37**(3): 467–498.

- Grogan Putney L. 2010. Case Study. In *Encyclopedia of Research Design*, Salkind N (ed): 116–119.
- Guba EG, Lincoln YS. 1994. Competing Paradigms in Qualitative Research. In *Handbook of Qualitative Research*, Denzin NK, Lincoln YS (eds). SAGE Publications: 105–117.
- Gunningham N. 1995. Environment, Self-Regulation, and the Chemical Industry: Assessing Responsible Care*. *Law & Policy* **17**(1): 57–109.
- Gunningham N, Kagan RA, Thornton D. 2004. Social License and Environmental Protection: Why Businesses Go Beyond Compliance. *Law & Social Inquiry* **29**(2): 307–341.
- Gunningham N, Sinclair D. 2002. Regulating Large Enterprises. In *Leaders and Laggards : Next-Generation Environmental Regulation*. Routledge: 94–133.
- Gupta AK, Lad LJ. 1983. Industry Self-Regulation : An Economic , Organizational , and Political Analysis1. *The Academy of Management Review* **8**(3): 416–425.
- Gupta S, Innes R. 2014. Private politics and environmental management. *Journal of Environmental Economics and Management*. Elsevier **68**(2): 319–339.
- Hahn T, Pinkse J. 2014. Private Environmental Governance Through Cross-Sector Partnerships: Tensions Between Competition and Effectiveness. *Organization and Environment* **27**(2): 140–160.
- Hart SL. 1995. A natural-resource-based view of the firm. *Academy of Management Review* **20**(4): 986–1014.
- Hart SL, Ahuja G. 1996. Does it pay to be green? *Business Strategy and the Environment* **56**(4): 497–507.
- Hart SM. 2010. Self-regulation, corporate social responsibility, and the business case: Do they work in achieving workplace equality and safety? *Journal of Business Ethics* **92**(4): 585–600.
- Hedström P. 2006. Explaining Social Change: An Analytical Approach. *Papers. Revista de Sociologia* **80**: 73.
- Hedström P, Swedberg R. 1998. *Social Mechanisms. An Analytical Approach to Social Theory*. Cambridge University Press.
- Hemphill TA. 1992. Self-regulating industry behavior: Antitrust limitations and trade association codes of conduct. *Journal of Business Ethics* **11**(12): 915–920.
- Hemphill TA. 1999. The White House Apparel Industry Partnership Agreement: Will Self-Regulation Be Successful? *Business and Society Review* **104**(2): 121–137.
- Hemphill TA, Banerjee S. 2015. Genetically modified organisms and the U.S. retail food labeling controversy: Consumer perceptions, regulation, and public policy. *Business and Society Review* **120**(3): 435–464.
- Henisz WJ, Zelner BA. 2018. Non-market strategy. In *The Palgrave Encyclopedia of Strategic Management*, Augier M, Teece DJ (eds). Palgrave Macmillan: London: 1134–1141. Available at: https://doi.org/10.1057/978-1-137-00772-8_555.
- Henriques I, Sadorsky P. 1999. The relationship between environmental commitment and managerial perceptions of stakeholder importance. *Academy of Management Journal*

42(1): 87–99.

- Héritier A, Eckert S. 2008. New modes of governance in the shadow of hierarchy: Self-regulation by industry in Europe. *Journal of Public Policy* 28(1): 113–138.
- Héritier A, Eckert S. 2009. Self-Regulation by Associations: Collective Action Problems in European Environmental Regulation. *Business and Politics* 11(1): 1–24.
- Heyes AG. 2005. A signaling motive for self-regulation in the shadow of coercion. *Journal of Economics and Business* 57(3): 238–246.
- Heyes AG, Lyon TP, Martin S. 2018. Saliency games: Private politics when public attention is limited. *Journal of Environmental Economics and Management*. Elsevier Inc. 88: 396–410.
- Hill MD, Kelly GW, Lockhart GB, Van Ness RA. 2013. Determinants and effects of corporate lobbying. *Financial Management* 42(4): 931–957.
- Hillman AJ, Hitt MA. 1999. Corporate political strategy formulation: A model of approach, participation, and strategy decisions. *Academy of Management Review* 24(4): 825–842.
- Hillman AJ, Keim GD. 2001. Shareholder value, stakeholder management, and social issues: What’s the bottom line? *Strategic Management Journal* 22(2): 125–139.
- Hillman AJ, Keim GD, Schuler D. 2004. Corporate Political Activity: A Review and Research Agenda. *Journal of Management* 30(6): 837–857.
- Hoffman AJ. 2001. Linking organizational and field-level analyses: The Diffusion of corporate environmental practice. *Organization and Environment* 14(2): 133–156.
- Hoffman AJ. 2007. The Coming Market Shift: Business Strategy and Climate Change. In *Cut Carbon, Grow Profits. Business Strategies for Managing Climate Change and Sustainability*, Tang K, Yeoh R (eds). Libri Publishing: 101–117.
- Hoffman AJ, Ocasio W. 2001. Not All Events Are Attended Equally: Toward a Middle-Range Theory of Industry Attention to External Events. *Organization Science* 12(4): 414–434.
- den Hond F, de Bakker FGA, Doh JP. 2015. What Prompts Companies to Collaboration With NGOs? Recent Evidence From the Netherlands. *Business & Society* 54(2): 187–228.
- Illari P. 2013. Mechanistic Explanation: Integrating the Ontic and Epistemic. *Erkenntnis* 78(SUPPL.2): 237–255.
- Illari PMK, Williamson J. 2012. What is a mechanism? Thinking about mechanisms across the sciences. *European Journal for Philosophy of Science* 2(1): 119–135.
- Jarzabkowski P, Kavas M, Krull E. 2021. It’s Practice. But is it Strategy? Reinvigorating strategy-as-practice by rethinking consequentiality. *Organization Theory* 2(3): 1–13.
- Jenkins R. 2001. *Codes of Conduct: Self Regulation in a Global Economy*.
- Jones P, Hillier D, Comfort D. 2016. Retailers and Sustainability in the US. *International Journal of Sales Retailing and Marketing* 5: 38–44.
- Kaiser MI, Krickel B. 2017. The metaphysics of constitutive mechanistic phenomena. *British Journal for the Philosophy of Science* 68(3): 745–779.

- Kanol D. 2015. Comparative lobbying research: Advances, shortcomings and recommendations. *Journal of Public Affairs* **15**(1): 107–112.
- Kaptein M, Schwartz MS. 2008. The effectiveness of business codes: A critical examination of existing studies and the development of an integrated research model. *Journal of Business Ethics* **77**(2): 111–127.
- Karnani A. 2011. ‘Doing well by doing good’: The grand illusion. *California Management Review* **53**(2): 69–86.
- Karty KD. 2002. Closure and Capture in Federal Advisory Committees. *Business and Politics* **4**(2): 213–238.
- Kassinis G, Vafeas N. 2006. Stakeholder pressures and environmental performance. *Academy of Management Journal* **49**(1): 145–159.
- Kawai N, Strange R, Zucchella A. 2018. Stakeholder pressures, EMS implementation, and green innovation in MNC overseas subsidiaries. *International Business Review*. Elsevier **27**(5): 933–946.
- Keillor BD, Hult GTM. 2004. Predictors of firm-level political behavior in the global business environment: an investigation of specific activities employed by US firms. *International Business Review* **13**(3): 309–329.
- Khanna M, Anton WRQ. 2002a. Corporate environmental management: Regulatory and market-based incentives. *Land Economics* **78**(4): 539–558.
- Khanna M, Anton WRQ. 2002b. What is driving corporate environmentalism: Opportunity or threat? *Corporate Environmental Strategy* **9**(4): 409–417.
- Kharbanda OP, Stallworthy EA. 1991. Industrial disasters-will self-regulation work? *Long Range Planning* **24**(3): 84–89.
- Kim EH, Lyon TP. 2015. Greenwash vs. Brownwash: Exaggeration and undue modesty in corporate sustainability disclosure. *Organization Science* **26**(3): 705–723.
- King A a., Lenox MJ, Terlaak AK. 2005. The strategic use of decentralized institutions: Exploring certifications with the ISO 14001 Management Standard. *Academy of Management Journal* **48**(6): 1091–1106.
- King AA, Lenox MJ. 2000. Industry Self-Regulation without Sanctions : The Chemical Industry ’ s Responsible Care Program Author (s): Andrew A . King and Michael J . Lenox Published by: Academy of Management Stable URL : <http://www.jstor.org/stable/1556362> REFERENCES Linked ref. *The Academy of Management Journal* **43**(4): 698–716.
- King AA, Lenox MJ, Barnett ML. 2002. Strategic Responses to the Reputation Commons Problem. In *Organizations, Policy, and The Natural Environment: Institutional and Strategic Perspectives*, Hoffman AJ, Ventresca M (eds). Stanford University Press: California: 393–406.
- King AA, Toffel MW. 2009. Self-regulatory institutions for solving environmental problems: Perspectives and contributions from the management literature. In *Governance for the Environment: New Perspectives*, Delmas MA, Young OR (eds): 98–116.
- Kirkland JH, Gray V, Lowery D. 2010. Policy agendas, party control, and PAC contributions in the American states. *Business and Politics* **12**(4): 1–24.

- Kolk A, van Tulder R. 2002. The Effectiveness of Self- regulation : Corporate Codes of Conduct and Child Labour. *European Management Journal* **20**(3): 260–271.
- Kroszner RS, Stratmann TS. 2000. Congressional Committees as Reputation-building Mechanisms. *Business and Politics* **2**(1): 35–52.
- Kuorikoski J. 2009. Two Concepts of Mechanism: Componential Causal System and Abstract Form of Interaction. *International Studies in the Philosophy of Science* **23**(2): 143–160.
- Labbé-Pinlon B, Lombart C, Louis D. 2013. Responsabilité sociétale et image-prix d'une enseigne : compatibilité du point de vu des consommateurs? *Revue de l'organisation responsable* **8**(1): 5–16.
- Lai KH, Cheng TCE, Tang AKY. 2010. Green retailing: Factors for success. *California Management Review* **52**(2): 6–31.
- Lake J. 2015. Revisiting the link between PAC contributions and lobbying expenditures. *European Journal of Political Economy* **37**: 86–101.
- Langley A. 1999. Strategies for theorizing from process data. *Academy of Management Review* **24**(4): 691–710.
- Lavorata L, Est IP, Mugel O. 2017. Compréhension des mécanismes de construction des stratégies de développement durable des distributeurs indépendants : une étude qualitative. *Revue de l'organisation responsable* **12**(1): 34–52.
- Lawton TC, Mcguire S, Rajwani T. 2013. Corporate Political Activity: A Literature Review and Research Agenda. *International Journal of Management Reviews* **15**(1): 86–105.
- Lebersorger S, Schneider F. 2014. Food loss rates at the food retail, influencing factors and reasons as a basis for waste prevention measures. *Waste Management*. Elsevier Ltd **34**(11): 1911–1919.
- Lee BH. 2009. The Infrastructure of Collective Action and Policy Content Diffusion in the Organic Food Industry. *Academy of Management Journal* **52**(6): 1247–1269.
- Lee D, Tongaralak MH. 2017. Converting retail food waste into by-product. *European Journal of Operational Research*. Elsevier B.V. **257**(3): 944–956.
- Lenox MJ. 2006. The Role of Private Decentralized Institutions in Sustaining Industry Self-Regulation. *Organization Science* **17**(6): 677–690.
- Lenox MJ, Eesley CE. 2009. Private environmental activism and the selection and response of firm targets. *Journal of Economics and Management Strategy* **18**(1): 45–73.
- Lerman MP, Mmbaga N, Smith A. 2022. Tracing Ideas From Langley (1999): Exemplars, Adaptations, Considerations, and Overlooked. *Organizational Research Methods* **25**(2): 1–23.
- Levy A. 2013. Three kinds of new mechanism. *Biology and Philosophy* **28**(1): 99–114.
- Levy DL, Newell PJ. 2002. Business Strategy and International Environmental Governance: Toward a Neo-Gramscian Synthesis. *Global Environmental Politics* **2**(4): 84–101.
- Liedong TA, Ghobadian A, Rajwani T, O'Regan N. 2015. Toward a View of Complementarity: Trust and Policy Influence Effects of Corporate Social Responsibility and Corporate Political Activity. *Group and Organization Management* **40**(3): 405–427.

- Listokin S. 2015. Industry Self-Regulation of Consumer Data Privacy and Security. *J. Marshall J. Info. Tech. & Privacy L.* **32**(XXXII): 15–32.
- Little D. 2013. Social Mechanisms and Scientific Realism: Discussion of ‘Mechanistic Explanation in Social Contexts’. *Social Epistemology Review and Reply Collective* **1**(3): 1–5. Available at: <http://wp.me/p1Bfg0-9i>.
- Lock I, Seele P. 2016. Deliberative Lobbying? Toward a Noncontradiction of Corporate Political Activities and Corporate Social Responsibility? *Journal of Management Inquiry* **25**(4): 415–430.
- Lock I, Seele P. 2018. Politicized CSR: How corporate political activity (mis-)uses political CSR. *Journal of Public Affairs* **18**(3): 1–9.
- Lord MD. 2000. Constituency-based Lobbying as Corporate Political Strategy: Testing an Agency Theory Perspective. *Business and Politics* **2**(3): 289–308.
- Lord MD. 2003. Constituency building as the foundation for corporate political strategy. *Academy of Management Executive* **17**(1): 112–124.
- de los Reyes G, Scholz M. 2022. Assessing the Legitimacy of Corporate Political Activity: Uber and the Quest for Responsible Innovation. *Journal of Business Ethics*. Springer Netherlands (0123456789).
- Lucea R, Doh JP. 2012. International strategy for the nonmarket context: Stakeholders, issues, networks, and geography. *Business and Politics* **14**(3): 1–30.
- Lux S, Crook TR, Woehr DJ. 2011. Mixing Business With Politics: A Meta-Analysis of the Antecedents and Outcomes of Corporate Political Activity. *Journal of Management* **37**(1): 223–247.
- Lynch-Wood G, Williamson D, Jenkins W. 2009. The over-reliance on self-regulation in CSR policy. *Business Ethics: A European Review* **18**(1): 52–65.
- Lyon TP, Maxwell JW. 1999. Corporate environmental strategies as tools to influence regulation. *Business Strategy & the Environment* **8**(3): 189–196.
- Lyon TP, Maxwell JW. 2004. Astroturf: Interest group lobbying and corporate strategy. *Journal of Economics and Management Strategy* **13**(4): 561–597.
- Lyon TP, Maxwell JW. 2011. Greenwash: Corporate Environmental Disclosure Under Threat of Audit. *Journal of Economics & Management Strategy* **20**(1): 3–41.
- Lyon TP, Maxwell JW. 2014. Regulatory Flexibility and Industry Self-Regulation Under Asymmetric Information : 1–29.
- Lyon TP, Montgomery AW. 2015. The Means and End of Greenwash. *Organization and Environment* **28**(2): 223–249.
- Lyon TP, Shimshack JP. 2015. Environmental Disclosure: Evidence From Newsweek’s Green Companies Rankings. *Business and Society* **54**(5): 632–675.
- Machamer P, Darden L, Craver CF. 2000. Thinking about Mechanisms. *Philosophy of Science* **67**(1): 1–25.
- Maitland I. 1985. The Limits of Business Self-Regulation. *California Management Review* **27**(3): 132–147.

- Malhotra N, Monin B, Tomz M. 2019. Does Private Regulation Preempt Public Regulation? *American Political Science Review* **113**(1): 19–37.
- Marquis C, Raynard M. 2015. Institutional Strategies in Emerging Markets. *Academy of Management Annals* **9**(1): 291–335.
- Marquis C, Toffel MW, Zhou Y. 2016. Scrutiny, norms, and selective disclosure: A global study of greenwashing. *Organization Science* **27**(2): 483–504.
- Marx A. 2008. Limits to non-state market regulation: A qualitative comparative analysis of the international sport footwear industry and the Fair Labor Association. *Regulation & Governance* **2**(2): 253–273.
- Mattingly JE. 2006. Radar Screens, Astroturf, and Dirty Work: A Qualitative Exploration of Structure and Process in Corporate Political Action. *Business and Society Review* **111**(2): 193–221.
- Maurer SM. 2017. The New Self-Governance: A Theoretical Framework. *Business and Politics* **19**(01): 41–67.
- Maxwell JA. 2008. Designing a Qualitative Study. In *The SAGE Handbook of Applied Social Research Methods*, Bickman L, Rog DJ (eds). SAGE Publications: 214–253.
- Maxwell JW. 1992. Understanding and Validity in Qualitative Research. *Harvard Educational Review* **63**(3): 279–300.
- Maxwell JW, Decker CS. 2006. Voluntary environmental investment and responsive regulation. *Environmental and Resource Economics* **33**(4): 425–439.
- Maxwell JW, Lyon TP, Hackett SC, Journal S, October N. 2000. Self-Regulation and Social Welfare: The Political Economy of Corporate Environmentalism. *Journal of Law & Economics* **43**(2): 583–617.
- McDonald R, Gao C. 2019. Pivoting isn't enough? Managing strategic reorientation in new ventures. *Organization Science* **30**(6): 1289–1318.
- McDonnell MH. 2016. Radical repertoires: The incidence and impact of corporate-sponsored social activism. *Organization Science* **27**(1): 53–71.
- McDonnell MH, Werner T. 2016. Blacklisted Businesses: Social Activists' Challenges and the Disruption of Corporate Political Activity. *Administrative Science Quarterly* **61**(4): 584–620.
- McGinn MK. 2010. Credibility. In *Encyclopedia of Case Study Research*, Mills A, Durepos G, Wiebe E (eds): 243–244.
- McKay A. 2010. The effects of interest groups' ideology on their PAC and lobbying expenditures. *Business and Politics* **12**(2).
- McKay AM. 2011. The decision to lobby bureaucrats. *Public Choice* **147**(1–2): 123–138.
- McWilliams A, Siegel DS. 2001. Corporate social responsibility: A theory of the firm perspective. *Academy of Management Review* **26**(1): 117–127.
- Megali T. 2020. *Régulations réclamées. Enquête sur le marché de la publicité en ligne et son autorégulation*. PSL.
- Mellahi K, Frynas JG, Sun P, Siegel DS. 2016. A Review of the Nonmarket Strategy

- Literature : Toward a Multi-Theoretical Integration. *Journal of Management* **42**(1): 143–173.
- Mena S, Palazzo G. 2012. Input and Output Legitimacy of Multi-Stakeholder Initiatives. *Business Ethics Quarterly* **22**(3): 527–556.
- Miller JW, Fugate BS, Golicic SL. 2017. How organizations respond to information disclosure: Testing alternative longitudinal performance trajectories. *Academy of Management Journal* **60**(3): 1016–1042.
- Mills A, Durepos G, Wiebe E. 2010. Reliability. In *Encyclopedia of Case Study Research*, Mills A, Durepos G, Wiebe E (eds). SAGE Publications: 801–802.
- Milyo J, Primo D, Groseclose T. 2000. Corporate PAC Campaign Contributions in Perspective. *Business and Politics* **2**(1): 75–88.
- Molina O. 2014. Self-regulation and the state in industrial relations in Southern Europe: Back to the future? *European Journal of Industrial Relations* **20**(1): 21–36.
- Montiel I, Husted BW, Christmann P. 2012. Using private management standard certification to reduce information asymmetries in corrupt environments. *Strategic Management Journal* **33**(9): 1103–1113.
- North DC. 1991. Institutions. *Journal of Economic Perspectives* **5**(1): 97–112.
- Ocasio W, Radoynovska N. 2016. Strategy and commitments to institutional logics: Organizational heterogeneity in business models and governance. *Strategic Organization* **14**(4): 287–309.
- Odziemkowska KD. 2019. *The Allies Of Others : How Stakeholders ' Relationships Shape Non-Market Strategy*. University of Pennsylvania.
- OECD. 1999. *Voluntary Approaches for Environmental Policy : an Assessment*.
- Ogus A. 1995. Rethinking Self-Regulation. *Oxford Journal of Legal Studies* **15**(1): 97–108.
- Ogus A. 1999. Self-Regulation. In *Encyclopedia of Law & Economics*, Bouckaert B, De Geest G (eds). Edward Elgar: 587–602.
- Oliver C, Holzinger I. 2008. The effectiveness of strategic political management: A dynamic capabilities framework. *Academy of Management Review* **33**(2): 496–520.
- Omarova ST. 2011. Wall Street as Community of Fate: Toward Financial Industry Self-regulation. *University of Pennsylvania Law Review* **159**(2): 411–492.
- Orru S. 2005. Halte aux sacs plastiques-! *Responsabilité & Environnement (Les Annales des Mines)* **39**: 67–76.
- Ozer M. 2010. Top management teams and corporate political activity: Do top management teams have influence on corporate political activity? *Journal of Business Research*. Elsevier Inc. **63**(11): 1196–1201.
- Pajunen K. 2008. The nature of organizational mechanisms. *Organization Studies* **29**(11): 1449–1468.
- Parker GR, Parker SL, Dabros MS. 2013. The Labor Market for Politicians: Why Ex-Legislators Gravitate to Lobbying. *Business and Society* **52**(3): 427–450.

- Parnell JA. 2018. Nonmarket and market strategies, strategic uncertainty and strategic capabilities: Evidence from the USA. *Management Research Review* **41**(2): 252–274.
- Pereira dos Passos AP, Prigol Meneghini EM, Lana J, Bahia Gama MA. 2022. Nonmarket Strategy: Paths and Prisms, *Brazilian Administration Review*, 19(4)1-24.
- Perez-Batres LA, Doh JP, Miller VV., Pisani MJ. 2012. Stakeholder Pressures as Determinants of CSR Strategic Choice: Why do Firms Choose Symbolic Versus Substantive Self-Regulatory Codes of Conduct? *Journal of Business Ethics* **110**(2): 157–172.
- Piekkari R, Welch C. 2018. The Case Study in Management Research: Beyond the Positivist Legacy of Eisenhardt and Yin? In *The SAGE Handbook of Qualitative Business and Management Research Methods: History and Traditions*: 345–358.
- Pierskalla J, Weschle S. 2014. Lobbying and the collective action problem : comparative evidence from enterprise surveys. *Business & Politics* **16**(2): 221–246.
- Pigé B. 2019. Théorie et fondements théoriques de la Tétranormalisation. *Recherches en Sciences de Gestion* N° **131**(2): 215–240.
- Pollach I. 2015. Strategic corporate social responsibility: The struggle for legitimacy and reputation. *International Journal of Business Governance and Ethics* **10**(1): 57–75.
- Porter ME, Kramer MR. 2011. Creating shared value. *Harvard Business Review* (February): 63–77.
- Porter ME, Linde C van der. 1995. Toward a New Conception of the Environment-Competitiveness Relationship. *Journal of Economic Perspectives* **9**(4): 97–118.
- Porter T, Ronit K. 2006. Self-regulation as policy process: The multiple and criss-crossing stages of private rule-making. *Policy Sciences* **39**(1): 41–72.
- Potoski M. 2017. Green clubs in building block climate change regimes. *Climatic Change*. *Climatic Change* **144**(1): 53–63.
- Potoski M, Prakash A. 2009. A Club Theory Approach to Voluntary Programs. In *Voluntary Programs : A Club Theory Perspective*. MIT Press: 17–39.
- Prasad A, Prasad P. 2002. The Coming of Age of Interpretive Organizational Research. *Organizational Research Methods* **5**(1):4–11
- Ramus CA, Montiel I. 2005. When are corporate environmental policies a form of greenwashing? *Business and Society* **44**(4): 377–414.
- Rasche A. 2015. The corporation as a political actor - European and North American perspectives. *European Management Journal* **33**(1): 4–8.
- Rees J, Gunningham N, Rees J. 1997. Industry Self-Regulation: An Institutional Perspective. *Law & Policy* **19**(4): 363–414.
- Rehbein K, Leonel R, Den Hond F, de Bakker FGA. 2020. How do firms that are changing the world engage politically? *Rutgers Business Review* **5**(2): 203–225.
- Rehbien K, Schuler DA. 1999. Testing the firm as a filter of corporate political action. *Business and Society* **38**(2): 144–166.
- Rehbien K, Schuler DA. 2015. Linking Corporate Community Programs and Political

- Strategies: A Resource-Based View. *Business and Society* **54**(6): 794–821.
- Reid EM, Toffel MW. 2009. Responding to Public and Private Politics: Corporate disclosure of Climate Change Strategies. *Academy of Management Journal* **30**: 1157–1178.
- Reinartz W, Dellaert B, Krafft M, Kumar V, Varadarajan R. 2011. Retailing innovations in a globalizing retail market environment. *Journal of Retailing*. New York University **87**(SUPPL. 1): S53–S66.
- Reiter B. 2013. The Epistemology and Methodology of Exploratory Social Science Research : Crossing Popper with Marcuse. *The Dialectics of Citizenship: Exploring Privilege, Exclusion, and Racialization* : 1–23.
- Richter BK. 2011. ‘Good’ and ‘Evil’: The Relationship between Corporate Social Responsibility and Corporate Political Activity. *SSRN Electronic Journal* : 1–36.
- Rindova VP, Petkova AP, Kotha S. 2007. Standing out: How new firms in emerging markets build reputation. *Strategic Organization* **5**(1): 31–70.
- Rival M. 2012. Are firms’ lobbying strategies universal? Comparison of lobbying by French and UK firms. *Journal of Strategy and Management* **5**(2): 211–230.
- Rival M. 2015. Alignement stratégique et stratégies politiques. Un entretien avec Thomas Lawton. *Revue française de gestion* **252**: 183–187.
- Rival M, Chanut V. 2015. Les stratégies politiques des organisations: De nouvelles perspectives pour la recherche en sciences de gestion. *Revue Française de Gestion* **252**(7): 71–88.
- Rival M, Déjean F. 2012. *Les stratégies hors marché , nouveaux enjeux pour l ’ entreprise L ’ exemple de la profession du chiffre.*
- Rodrigue M, Magnan M, Cho CH. 2013. Is Environmental Governance Substantive or Symbolic? An Empirical Investigation. *Journal of Business Ethics* **114**(1): 107–129.
- Rotfeld HJ. 2010. Confusions, contexts, and foundations for understanding advertising regulation as related to the research of Jean J. Boddewyn. *International Studies of Management and Organization* **40**(4): 94–103.
- Sadrich F, Annavarjulia M. 2003. Antecedents of Corporate Lobbying Participation and Intensity : a review of the Literature. *Public Administration Quarterly* **26**(3/4): 465–502.
- Salorio EM, Boddewyn JJ, Dahan NM. 2005. Integrating Business Political Behavior with Economic and Organizational Strategies. *International Studies of Management & Organization* **35**(2): 28–55.
- Salzmann O, Ionescu-Somers AM, Steger U. 2005. The business case for corporate sustainability: Literature review and research options. *European Management Journal* **23**(1): 27–36.
- Scherer AG, Palazzo G, Matten D. 2014. The Business Firm as a Political Actor: A New Theory of the Firm for a Globalized World. *Business & Society* **53**(2): 143–156.
- Schmid N, Haelg L, Sewerin S, Schmidt TS, Simmen I. 2021. Governing complex societal problems: The impact of private on public regulation through technological change. *Regulation and Governance* **15**(3): 840–855.

- Schuler DA, Rehbien K, Cramer RD. 2002. Pursuing strategic advantage through political means: A multivariate approach. *Academy of Management Journal* **45**(4): 659–672.
- Seeringer A. 2016. *Determinants of nonmarket strategies of business firms: A country-based, comparative Perspective*. Technische Universität Berlin.
- Sharma LL, Teret SP, Brownell KD. 2010. The food industry and self-regulation: Standards to promote success and to avoid public health failures. *American Journal of Public Health* **100**(2): 240–246.
- Sharma S. 2000. Managerial Interpretations and Organizational Context as Predictors of Corporate Choice of Environmental Strategy. *Academy of Management Journal* **43**(4): 681–697.
- Sheehy B. 2015. Defining CSR: Problems and Solutions. *Journal of Business Ethics*. Springer Netherlands **131**(3): 625–648.
- Short JL, Toffel MW. 2010. Making Self-Regulation More Than Merely Symbolic : The Critical Role of the Legal Environment. *Administrative Science Quarterly* **55**(3): 361–396.
- Shrivastava P, Scott H. 1992. Corporate self-greenewal: Strategic responses to environmentalism. *Business Strategy and the Environment* **1**(3): 9–21.
- Sidki Darendeli I, Hill TL. 2016. Uncovering the complex relationships between political risk and MNE firm legitimacy: Insights from Libya. *Journal of International Business Studies* **47**(1): 68–92.
- Sinclair D. 1997. Self-regulation versus command and control? Beyond false dichotomies. *Law and Policy* **19**(4): 529–559.
- Smith D, Tombs S. 1995. Beyond self-regulation: towards a critique of self-regulation as a control strategy for hazardous activities*. *Journal of Management Studies* **32**(September): 619–636.
- Solomon JM. 2010. New Governance, Preemptive Self-Regulation, and the Blurring of Boundaries in Regulatory Theory and Practice. *Wisconsin Law Review* **591**(09): 591–625.
- Soule SA. 2012. Targeting Organizations: Private and Contentious Politics. In *Rethinking Power in Organizations, Institutions, and Markets (Research in the Sociology of Organizations)*. Emerald Group Publishing Ltd, 34: 261–285.
- Spiller PT, Gely R. 2007. *Strategic Judicial Decision Making*. National Bureau of Economic Research Working Paper. Cambridge.
- Springuel A. 2011. L ' influence dans la stratégie des entreprises. *Revue internationale d'intelligence économique* **3**: 153–160.
- Stebbins, R. A. 2011. What Is Exploration? In: *Exploratory Research in the Social Sciences*, SAGE Research Methods, SAGE Publications, Inc.
- Steel D. 2004. Social Mechanisms and Causal Inference. *Philosophy of the Social Sciences* **34**(1): 55–78.
- Stefanadis C. 2003. Self-Regulation, Innovation, and the Financial Industry. *Journal of Regulatory Economics* **23**(1): 5–25.

- Steurer R. 2013. Disentangling governance : a synoptic view of regulation by government , business and civil society. *Policy Sciences* **46**(4): 387–410.
- Su N. 2018. Positivist Qualitative Methods. In *The SAGE Handbook of Qualitative Business and Management Research Methods: Methods and Challenges*, Cassell C, Cunliffe A, Grandy G (eds). SAGE Publications: 17–31.
- Suarez SL. 1998. Lessons Learned : Explaining the Political Behavior of Business. *Polity* **31**(1): 161–186.
- Sun, Pei; Mellahi, Kamel; Wright M. 2012. The Contingent Value of Corporate Political Ties. *Academy of Management Perspectives* **26**(3): 68–83.
- Sun P, Doh JP, Rajwani T, Siegel D. 2021. Navigating cross-border institutional complexity: A review and assessment of multinational nonmarket strategy research. *Journal of International Business Studies*. Palgrave Macmillan UK **52**(9): 1818–1853.
- Swaffield J, Evans D, Welch D. 2018. Profit, reputation and ‘doing the right thing’: Convention theory and the problem of food waste in the UK retail sector. *Geoforum* **89**: 43–51.
- Teller C, Holweg C, Reiner G, Kotzab H. 2018. Retail store operations and food waste. *Journal of Cleaner Production*. Elsevier Ltd **185**: 981–997.
- Terlaak AK. 2007. Order Without Law? the Role of Certified Management Standards in Shaping Socially Desired Firm Behaviors **32**(3): 968–985.
- Tetrault Sirsly CA, Lamertz K. 2008. When does a corporate social responsibility initiative provide a first-mover advantage? *Business & Society* **47**(3): 343–369.
- Tsang EWK. 2014. Generalizing from research findings: The merits of case studies. *International Journal of Management Reviews* **16**(4): 369–383.
- Tzavara D, Héritier A. 2012. Quality and environmental regulation: Verifying compliance along the supply chain. *Business and Politics* **14**(2).
- Vogel D. 2010. The Private Regulation of Global Corporate Conduct. Achievements and Limitations. *Business & Society* **49**(1): 68–87.
- Voinea CL, van Kranenburg H. 2018. Feeling the Squeeze: Nonmarket Institutional Pressures and Firm Nonmarket Strategies. *Management International Review* **58**(5): 705–741.
- Walker K, Wan F. 2012. The Harm of Symbolic Actions and Green-Washing: Corporate Actions and Communications on Environmental Performance and Their Financial Implications. *Journal of Business Ethics* **109**(2): 227–242.
- Wang J, Pham TL, Dang VT. 2020. Environmental consciousness and organic food purchase intention: A moderated mediation model of perceived food quality and price sensitivity. *International Journal of Environmental Research and Public Health* **17**(3): 1–18.
- Watson K, Klingenberg B, Polito T, Geurts TG. 2004. Impact of environmental management system implementation on financial performance: A comparison of two corporate strategies. *Management of Environmental Quality: An International Journal* **15**(6): 622–628.
- Whitehead J. 2017. Prioritizing Sustainability Indicators: Using Materiality Analysis to Guide Sustainability Assessment and Strategy. *Business Strategy and the Environment* **26**(3):

399–412.

- Whitford AB., Tucker JA. 2012. Focal Points in Public Policy: Evidence from Voluntary Regulation. *Review of Policy Research* **29**(2): 281–299.
- Wight C. 2015. Mechanisms and Models: Some Examples from International Relations. In *Generative Mechanisms Transforming the Social Order*, Archer MS (ed). Springer International Publishing: Cham: 49–64.
- Wijen F. 2014. Means versus ends in opaque institutional fields: Trading off compliance and achievement in sustainability standard adoption. *Academy of Management Review* **39**(3): 302–323.
- Winter SC, May PJ. 2001. Motivation for {Compliance} with {Environmental} {Regulations}. *Journal of Policy Analysis and Management* **20**(4): 675–698.
- Wittneben BBF, Okererke C, Banerjee SB, Levy DL. 2012. Climate Change and the Emergence of New Organizational Landscapes. *Organization Studies* **33**(11): 1431–1450.
- Wolf J. 2014. The Relationship Between Sustainable Supply Chain Management, Stakeholder Pressure and Corporate Sustainability Performance. *Journal of Business Ethics* **119**(3): 317–328.
- Wrona T, Sinzig C. 2018. Nonmarket strategy research: systematic literature review and future directions. *Journal of Business Economics*. Springer Berlin Heidelberg **88**(2): 253–317.
- Wu JJ. 2009. Environmental compliance: The good, the bad, and the super green. *Journal of Environmental Management*. Elsevier Ltd **90**(11): 3363–3381.
- Xie P, Li X, Xie X. 2014. The integration of corporate non-market and market strategies: why, what, and how. *Nankai Business Review International* **5**(1): 115–132.
- Ylikoski P. 2019. Mechanism-based theorizing and generalization from case studies. *Studies in History and Philosophy of Science Part A*. Elsevier **78**(November 2018): 14–22.
- York JG, Vedula S, Lenox MJ. 2018. It's not easy building green: The impact of public policy, private actors, and regional logics on voluntary standards adoption. *Academy of Management Journal* **61**(4): 1492–1523.
- You HY. 2017. Ex post lobbying. *Journal of Politics* **79**(4): 1162–1176.
- Young KL, Marple T, Heilman J. 2017. Beyond the revolving door: Advocacy behavior and social distance to financial regulators. *Business and Politics* **19**(2): 327–364.
- Zhao E, Fisher G, Lounsbury M, Miller D. 2017. Optimal distinctiveness: broadening the interface between institutional theory and strategic management. *Strategic Management Journal* **38**: 93–113.

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APPENDIXES

Appendix 1. Review of other nonmarket activities

In addition to the typical nonmarket activities – lobbying, financial contributions and constituency building - considered informational, transactional and relational strategies, some other types of corporate initiatives have been analysed in the literature.

Besides the mobilisation of traditional lobbying of legislative bodies, an organization may also supply information to decision-makers through the political committee or other consultative body if such exists (Karty, 2002; Kroszner and Stratmann, 2000). Expert testimony and providing technical details to decision-makers is a way to have a firm voice in a political advisory body (Lux et al., 2011; McDonnell and Werner, 2016). Significantly, the lobby can tackle executive agencies and judges (Spiller and Gely, 2007). Bureaucratic lobbying is less noticeable as most transparency legislation is focused on the legislature; however, it is demonstrated that lobbying in the legislative branch is highly correlated with lobbying in the executive (McKay, 2011). The lobbying on implementation rules, also called “ex-post lobbying”, can take the form of public comments or advisory committees on specific issues, among others, and “aims to influence the distribution of particularistic benefits that will arise from legislation by targeting regulatory rule-making processes” (You, 2017: 1162).

Increased corporate transparency can help companies to answer social and public policy pressure when information is disclosed (via non-financial reporting or Quality Safety Environment communication) and target the firm’s stakeholders (Fasterling, 2012; Favotto and Kollman, 2021; Marquis *et al.*, 2016). Among activities based on information disclosure by private companies, alternatives exist in influencing media content or direct public campaign (Bonardi and Keim, 2005) along with communication with other stakeholders.

If possible from a legal point of view, a company may directly finance a political party or specific movement. However, it can also apply the transactional strategy to other actors in the nonmarket setting. Financial support to interest groups includes contributions to existing NGOs (advocacy advertising), transparent corporate sponsorship of social movements or secret creation and sponsorship of supposedly independent grassroots movements. Thus, monetary resources may be used to finance new research by experts, finance an adverse group

to alter its lobbying activities or organise corporate sponsorship, such as astroturf or overt participation (Lyon and Maxwell, 2004; Mattingly, 2006; McDonnell, 2016).

As long as relational strategies are concerned, community programs help gain stakeholders' support, who in turn express their preferences to a firm (Rehbién and Schuler, 2015). Also, maintaining political ties, defined as a firm's links with political actors and institutions via social relationships, constitutes an important political activity (Sun, Pei; Mellahi, Kamel; Wright, 2012). Similarly, social relationships and easy access to other players allow the possibility of exchanging confidential information with other actors. The practice called 'personal service' or 'revolving door' (consisting of hiring prominent politicians by private companies to benefit from their personal networks or the inverse movement of private managers to public institutions) reinforces the political ties (Parker, Parker, and Dabros, 2013; Young, Marple, and Heilman, 2017).

This brief review shows that a company has a wide range of activities available to influence its nonmarket environment.

Appendix 2. The waste prevention solutions

The solutions⁴⁰ are categorised into three groups according to the types of self-regulation practice, that is, organizational, operational, and communicational.

Table 33. Possible solutions to reduce waste in the retail sector

Process or practice		Type of self-regulation		
		Organizational	Operational	Communicational
1	Auditing, waste reporting, benchmarking	x		x
2	Lifecycle analysis of products	x		
3	Eco-design	x	x	
4	Specifications for purchased products	x	x	
5	Take-back agreements		x	
6	Reducing a product range or the number of stock-keeping units (SKUs)		x	
7	Replenishment policy (inventory management, demand forecasting)		x	
8	Modifying operating conditions		x	
9	Bulk sale		x	
10	Instore signaletic		x	x
11	Extension of the date of consumption*		x	
12	Dynamic shelf-life policy*		x	
13	Onsite transformation*		x	
14	Sale of imperfect products		x	
15	Discounting		x	
16	Donations	x	x	
17	Recovery for animal feed*		x	
18	Personnel training	x	x	

*specific to food waste

⁴⁰ The list of practices was established based on the academic literature review including eleven studies on retail food waste in European countries (Buisman *et al.*, 2019a; Buisman, Haijema, and Bloemhof-Ruwaard, 2019b; Cicatiello *et al.*, 2016; Corrado *et al.*, 2019; Dreyer *et al.*, 2019; Filimonau and Gherbin, 2018; Ghosh and Eriksson, 2019; Lebersorger and Schneider, 2014; Lee and Tongarlak, 2017; Swaffield *et al.*, 2018; Teller *et al.*, 2018). They can be applied in terms of general retailer's policy or implemented as specific in-store practices.

Appendix 3. The list of sources used for the press review

The figure below presents the titles (as coded for further analysis) of journals and magazines which were used for press review. 147 sources were identified.

Figure 29. List of journals used for the press review

<ul style="list-style-type: none"> *title_20Minutes *title_ATS-AgenceTélégraphiqueSuisse *title_Actu-Environnement *title_Actu-Environnement.com *title_AgenceFrancePresse *title_AgenceFrancePresseECOFIN *title_Atlantico *title_BUSINESSIMMO.com *title_Boursier.com *title_CBNwsletter *title_Caractère *title_CentrePresse *title_Challenges 	<ul style="list-style-type: none"> *title_LaDépêcheduMidi *title_LaGazettedesCommunes *title_LaLettreValloire *title_LaLettredel'Expansion *title_LaMeuse *title_LaMontagne *title_LaMontagne.fr *title_LaNouvelleRépubliqueDimanche *title_LaNouvelleRépubliquesdesPyrénées *title_LaNouvelleRépubliqueduCentreOue: *title_LaProvence *title_LaRépubliquesdesPyrénées *title_LaRépubliqueduCentre 	<ul style="list-style-type: none"> *title_LesEchosBusiness.fr *title_LesEchosWeek-End *title_Lyonne.fr *title_L'EchoRépublicain *title_L'Entreprise *title_L'Express *title_L'UsineNouvelle *title_L'YonneRépublicaine *title_L'Express-L'Impartial *title_L'Obs *title_Marianne *title_MidiLibre *title_MieuxVivreVotreArgent
<ul style="list-style-type: none"> *title_Challenges.fr *title_Corse-Matin *title_CosmétiqueHebdo *title_CourrierPicard *title_DordogneLibre *title_Droitdel'Environnement *title_EMACOM *title_EUR-Lex *title_Emballagesmagazine.com *title_Environnement&EnergieMagazine *title_Environnement-Magazine.fr *title_Environnement-magazineE-NEWS *title_EnvironnementMagazine 	<ul style="list-style-type: none"> *title_LaTribune *title_LaTribune.fr *title_LaTribuneHebdomadaire *title_LaVoixEco *title_LaVoixduNord *title_Larep.fr *title_LeBerryRépublicain *title_LeCercleLesEchos *title_LeCourrierdel'Ouest *title_LeFigaro *title_LeFigaroPremium *title_LeHavrePresse *title_LeJournaldel'ÎledelaRéunion 	<ul style="list-style-type: none"> *title_Nasdaq/Globenewswire *title_NewsPress *title_Nice-Matin *title_NordLittoral *title_NordÉclair *title_Nouvelobs.com *title_Novethic.fr *title_Négoce *title_Néorestauration *title_Ouest *title_OuestFrance *title_PRNewswireEurope *title_ParisNormandie
<ul style="list-style-type: none"> *title_EnvironnementMagazineCleantech *title_EnvironnementOnline *title_EurActiv.fr *title_GreenUnivers *title_Hautes-Pyrénées *title_Hydroplus *title_Industrie&Technologies *title_Journaldel'environnement *title_L'ÉclaircurduGâtinais *title_L'Est *title_L'EstRépublicain *title_L'EstÉclair *title_L'Expansion 	<ul style="list-style-type: none"> *title_LeJournaldesEntreprises *title_LeJournalduCentre *title_LeMaineLibre *title_LeMoniteur.fr *title_LeMoniteurdesTravauxPublicsetduBâ *title_LeNouvelMarianne *title_LeParisien *title_LeParisien-Aujourd'huienFrance *title_LeParticulierPratique *title_LePaysRoannais *title_LePetitBleudeLot-et-Garonne *title_LePetitJournal *title_LePoint 	<ul style="list-style-type: none"> *title_Parismatch.com *title_PointsdeVente *title_PresseOcéan *title_RecyclageRécupération *title_RestaurationCollective *title_Reuters-Lesactualitésenfrançais *title_Sciencesetavenir.fr *title_StopArmaques *title_Stratégies *title_StratégiesNewsletter *title_SudOuest *title_Trends/Tendances *title_Usinenouvelle.com
<ul style="list-style-type: none"> *title_L'Express *title_L'Humanité *title_L'HumanitéDimanche *title_L'Indépendant *title_L'Opinion *title_L'Union/L'Ardennais *title_L'ÉditionduSoirparOuestFrance *title_LSA *title_LSA.fr *title_LaCharenteLibre *title_LaCorrespondanceEconomique *title_LaCorrespondancedelaPublicité *title_LaCroix 	<ul style="list-style-type: none"> *title_LePoint.fr *title_LePopulaireduCentre *title_LeProgrès *title_LeProgrèsdeFécamp *title_LeQuotidien *title_LeRépublicainLorrain *title_LeTélégramme *title_Leberry.fr *title_Lejdc.fr *title_Lejdd.fr *title_Lepopulaire.fr *title_LesEchos *title_LesEchos.fr 	<ul style="list-style-type: none"> *title_Var-Matin *title_VosgesMatin *title_ZERONET *title_LeParisien.fr

Appendix 4. Methodology for press articles selection process

The press articles regarding Auchan and E.Leclerc companies were initially withdrawn from Factiva database and afterwards complemented with 45 sources from Europresse. The main criteria for the articles section were the company and the period from the beginning of 2009 to mid-2019. To be sure to cover the large scope of issues linked to waste management, I used twenty-four predefined keywords that were identified thanks to the content analyse of eleven research articles published from 2014 to 2019 on food waste in the retail sector. The keywords are linked to the following categories: general waste policy, food waste policy, materials, circular economy policy, and communication. The table below presents the number of articles that resulted from the requests that were formulated as follows: within the given period, I searched for the articles mentioning the name of the company and the keyword.

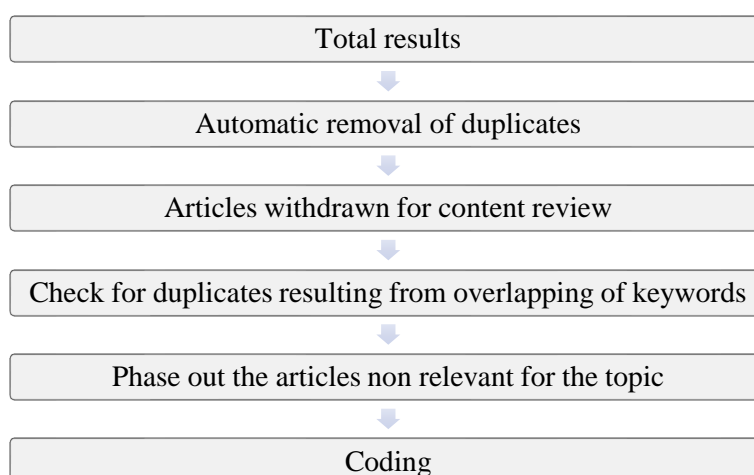
Figure 30. Total number of articles withdrawn from Factiva database for Auchan and E.Leclerc*

CASE 1				CASE 2			
	Total results	Duplicates	Content review		Total results	Duplicates	Content review
1 déchets	227	46	181	1 déchets	712	95	617
2 valorisation des déchets	19	3	16	2 valorisation des déchets	17	1	16
3 gestion des déchets	17	5	12	3 gestion des déchets	28	7	21
4 traitement des déchets	24	9	15	4 traitement des déchets	15	5	10
5 économie circulaire	40	14	26	5 économie circulaire	41	8	33
6 éco-conception	4	1	3	6 éco-conception	3	0	3
7 gaspillage alimentaire	64	18	46	7 gaspillage alimentaire	96	30	66
8 collecte des déchets	65	0	65	8 collecte des déchets	37	1	36
9 DLUO	6	2	4	9 DLUO	5	1	4
10 DLC	22	7	15	10 DLC	20	4	16
11 don alimentaire	8	3	5	11 don alimentaire	4	0	4
12 circuit court	39	9	30	12 circuit court	42	8	34
13 plastique	165	36	129	13 plastique	314	62	252
14 recyclage	103	19	84	14 recyclage	200	22	178
15 transformation des déchets	1	0	1	15 transformation des déchets	0	0	0
16 légumes moches	14	5	9	16 légumes moches	12	5	7
17 rapport RSE	1	0	1	17 rapport RSE	1	0	1
18 affichage environnemental	20	3	17	18 affichage environnemental	1	0	1
19 emballage	131	29	102	19 emballage	165	28	137
20 durée de vie des produits	3	0	3	20 durée de vie des produits	3	0	3
21 biodéchets	2	0	2	21 biodéchets	4	1	3
22 greenwashing	5	0	5	22 greenwashing	6	0	6
23 zéro déchets	2	0	2	23 zéro déchets	9	2	7
24 tri sélectif	9	1	8	24 tri sélectif	60	4	56
TOTAL	991	210	781	TOTAL	1795	284	1511

*Auchan (indicated in the table as CASE 1) and E.Leclerc (indicated in the table as CASE 2)

The search composed of 48 (2 times 24) separate requests gave 2786 records and the results were subjected to further processing. The scheme below presents the following steps from the total number of articles identified within Factiva database to the selection of articles for coding.

Figure 31. Scheme of articles selection for textual analysis



The final selection of articles for coding accounted for 615 articles as presented in the table below.

Figure 32. Total of articles withdrawn from Factiva

	Case 1	Case 2	Total
Total of articles found by keywords	998	1795	2793
Number of duplicates determined automatically by Factiva	217	284	501
Articles withdrawn from Factiva	781	1511	2292
Articles coded for further analysis	308	307	615

Further, I proceeded with a compilation of articles from Europress. The scheme for the text selection was reproduced when searching for articles within the second database. 181 additional articles were withdrawn and coded. The total number of articles coded individually is 796, as presented in the table below.

Table 34. Total number of articles used in the press review

	Auchan	E.Leclerc	Total
Articles withdrawn and coded from Europress	85	96	181
Total Factiva + Europress	393	403	796

The corpus accounts for 880 single-spaced pages in Word format (Times New Roman 11). Each text is prepared in a monothematic manner, where each line is followed by a joint text. The monothematic analysis provides a more in-depth understanding of the studied object.

Appendix 5. Interview guides

Guide d'entretien n°1 – gestion environnementale

1) Présentation de projet de recherche

Objectif principal de recherche : documenter la façon dont les entreprises décident et implémentent les actions de protection d'environnement de leur propre initiative.

Intérêt personnel de l'interlocuteur – démontrer les initiatives environnementales mises en place au sein de son organisation/sa structure et valoriser le positionnement de l'entreprise sur les thématiques écologiques.

Intérêt scientifique – dans le domaine de gestion environnementale valoriser l'expérience tirée de mise en place des initiatives volontaires, dépassant le cadre réglementaire.

2) Modalités d'entretien

L'échange est enregistré et transcrit intégralement, de manière anonyme.

Les données audios seront détruites, une copie de la transcription sera exploitée pour l'analyse des données.

Les résultats de la recherche sont accessibles et discutables.

3) Déroulement

Présentation d'interlocuteur

Echange

Table 35. Interview guide – environmental self-regulation

Sujets	Objectif de compréhension	Exemples de questions	Points de vigilance
Politique / stratégie environnementale de l'entreprise	<ul style="list-style-type: none"> - Cohérence d'actions avec la stratégie de l'entreprise - Approche opportuniste/planning 	<ul style="list-style-type: none"> - Est-ce que l'entreprise dispose d'une stratégie environnementale clairement définie ? - Comment vous avez appris son existence ? - Y a-t-il des éléments/thématiques prédominantes ? 	Place de la stratégie environnementale dans le cadre de la RSE globale
Gouvernance	<ul style="list-style-type: none"> - Les origines des initiatives/actions - Perception organisationnelle des pressions institutionnelles 	<ul style="list-style-type: none"> - Est-ce qu'il existe une structure dédiée aux sujets environnementaux ? - Qui est décideur / exécutant ? (top-down ou bottom-up) - Disposez-vous d'une cellule/département dédié qui réalise la veille réglementaire / la veille sociétale / benchmark ? - Comment des divers départements sont impliqués dans l'adaptation de l'initiative proposé (technique, affaires publiques, marketing) ? 	- vocabulaire utilisé / l'engage: DD, QSE, etc.
Le concept de l'autorégulation Le concept de l'autorégulation - continuation		<ul style="list-style-type: none"> - Pouvez-vous me dire ce que vous entendez par l'initiative environnementale volontaire ? Pouvez-vous donner un exemple d'une telle initiative ? - Quel relation avec la réglementation existante ? – action innovante, réglementation n'existe pas ou « beyond compliance » - Trouvez-vous que les actions relèvent plutôt de 'atténuer des effets négatifs' ou 'faire un impact positif' ? 	
Retour d'expérience	- Codification de process SR	<ul style="list-style-type: none"> - A quel échelon se situe la responsabilité d'implémentation des projets ? - Quels sont des méthodes d'implémentation et d'évaluation ? - Est-ce que les résultats de votre action servent à d'autre chose que l'évaluation de projet ? 	- formations internes, - communication marketing
Compliance		- Est-ce qu'il existe une structure de 'compliance' ? Pour quel type de thématiques ?	Intégration du service juridique, autre ?

Sujets	Objectif de compréhension	Exemples de questions	Points de vigilance
Coopétition		<ul style="list-style-type: none"> - Entreprise est-elle membre de quel(s) réseau(x) ? - Qui vous représente ? quel type d'activités au sein de réseau(x) ? - Est-ce que vous échangez vos retours d'expérience avec d'autres entreprises dans le secteur ? 	
Autres parties prenantes		<ul style="list-style-type: none"> - Cherchez-vous à intégrer des programmes nationaux/sectoriel sur les thématiques environnementales - Projets réalisés en collaboration avec des associations 	
Rôle du prestataire		<ul style="list-style-type: none"> - Pouvez-vous nous dire quel rôle un prestataire, par exemple un cabinet de conseil, peut avoir dans l'établissement ou mise en place des initiatives ? - Avez-vous personnellement un rôle à jouer dans le contact avec des prestataires – sélection, consultations, suivi de projets ? 	
Communication	Exploitation des résultats de l'action	<ul style="list-style-type: none"> - Comment sont communiqués les résultats de vos actions à l'interne ? - Comment sont communiqués les résultats de vos actions à l'extérieur ? - Quels moyens de communication utilisez-vous ? 	
Temporalité		<ul style="list-style-type: none"> - Comment vivez-vous le facteur temps – stratégies long terme et l'attente des résultats immédiats / nécessité de publier des rapports RSE chaque année ? - Réalisation de projets pilotes 	

Guide d'entretien n° 2 – gestion de déchets

1) Présentation de projet de recherche

Objectif principal de recherche : documenter la façon dont les entreprises mènent leur politique de la gestion de déchets ; retracer des origines d'initiatives → leur mise en place → résultats : démultiplication, communication, reporting

Intérêt personnel – démontrer les initiatives environnementales mises en place au sein de son organisation/sa structure et valoriser le positionnement de l'entreprise sur les thématiques écologiques.

Intérêt scientifique – dans le domaine de gestion valoriser l'expérience tirée de mise en place des initiatives volontaires, dépassant le cadre règlementaire de protection environnementale.

2) Modalités d'entretien

L'échange est enregistré et transcrit intégralement, de manière anonyme.

Les données audios seront détruites, une copie de la transcription sera exploitée pour l'analyse des données.

Les résultats de la recherche sont accessibles et discutables.

3) Déroulement

Présentation d'interlocuteur

Echange

Table 36. Interview guide – waste prevention and management

Sujets	Objectif de compréhension	Exemples de questions	Points de vigilance
Gestion de déchets en sens large	- Approche opportuniste vs. planning	- Est-ce que l'entreprise dispose d'une stratégie déchets clairement définie ? Sur quelles catégories de déchets ? - Quels sont les objectifs ?	
Gouvernance	- Les origines des initiatives/actions - Organizational perception of institutional pressures	- Qui est en charge de la politique de gestion de déchets ? Qui d'autre y est impliqué ? (acheteurs, département de logistique, etc.) - Quels sont des origines des différents programmes/initiatives ? - Quel partage de tâches entre la gestion centralisée et la mise en place dans les points de vente ? - Voyez-vous une parallèle entre le sujet de gestion de déchets et par exemple de l'énergie ? autres pratiques environnementales ?	- Détecter nouveaux acteurs
Le concept de l'autorégulation		- Pouvez-vous donner des exemples des initiatives volontaires en la matière? - Quel relation avec la réglementation existante ? – action innovante, réglementation n'existe pas ou « beyond compliance » - trouvez-vous que les actions relèvent plutôt de 'atténuer des effets négatifs' ou 'faire un impact positif'	- Détecter les thématiques sur lesquelles se positionne l'entreprise
Retour d'expérience	- Codification de process SR	- Suivi d'implémentation des projets – qui et comment ? - Définition initial de méthode d'évaluation - Est-ce que les résultats de votre action servent à d'autre chose que l'évaluation de projet ? Y a-t-il eu des événements/résultats inattendus ? - Quid du développement des compétences – formations internes	
Coopétition	- Relations avec d'autres acteurs	- Echangez-vous bonnes pratiques avec les concurrents ? volontairement / en mode donneur ou preneur	
Autres parties prenantes		- Cherchez-vous à intégrer des programmes nationaux/sectoriel sur les thématiques de gestion de déchets/économie circulaire ? - Avez-vous réalisé des projets en collaboration avec des associations ? - Qui des relations avec des autorités locales ?	

Sujets	Objectif de compréhension	Exemples de questions	Points de vigilance
Rôle du prestataire		<ul style="list-style-type: none"> - Pouvez-vous nous dire quel rôle un prestataire, par exemple un cabinet de conseil, peut avoir dans l'établissement ou mise en place des initiatives ? - Avez-vous personnellement un rôle à jouer dans le contact avec des prestataires – sélection, consultations, suivi de projets ? 	
Communication	- Exploitation des résultats de l'action	<ul style="list-style-type: none"> - Comment sont communiqué les résultats de vos actions à l'interne ? - Comment sont communiqué les résultats de vos actions à l'extérieur ? - Quels moyens de communication utilisez-vous ? 	Média, acteurs institutionnels, consommateurs
Temporalité		<ul style="list-style-type: none"> - Comment vivez-vous le facteur temps – stratégies long terme et l'attente des résultats immédiats / nécessité de publier des rapports RSE chaque année ? - Réalisation de projets pilotes et massification de solution 	

Appendix 6. Summary of primary contextual information sources – expert interviews.

Table 37. Summary of expert interviews

	Organization	Position	Date	Time	Place	Pages
1	Consultancy 1	Senior Consultant - CSR for retail sector	11.03.2019	1h27	Paris	18
2	Consultancy 2	Associate Director	14.06.2019	54'	Paris	16
3	Consultancy 3	Senior consultant - CSR and circular economy	13.11.2019	58'	Paris	12
4	Consultancy 4	Senior consultant - plastics	6.11.2019	1h24'	Call - Paris	18
5	Industry Association 1	Project Manager - Environment and transport	16.04.2019	1h06	Paris	17
6	Industry Association 1	Director – Quality	22.11.2019	45'	Paris	11
7	Industry Association 2	Project Manager	23.08.2019	1h20'	Paris	17
8	National Environmental Agency	Director - Action against food waste	7.11.2019	54'	Call - Angers	11
9	National Environmental Agency	Project Manager - Bretagne	15.11.2019	46'	Call - Rennes	11
10	Competitor 1	Director - Logistics and environment	2.09.2019	49	Suburb of Paris	14
11	Competitor 1	Project manager - waste management	11.08.2019	1h10'	Call - Paris	10
12	Competitor 2	Project Manager - CSR	22.11.2019	59'	Paris	13
13	Competitor 3	Project Manager - CSR	11.03.2019	1h02	Call - Paris	18

Appendix 7. Summary of secondary information sources regarding legislative framework and evolution of the political environment

Table 38. Summary of secondary data on legislative framework

	Title	Organization	Year	Type of document	Pages
1	Prévention de la production de déchets	Ministère de l'Ecologie	2004	National action plan	31
2	Le Grenelle Environnement. Rapport du rapporteur général Thierry Tuot	Ministère de l'Ecologie	2007	Report	39
3	Loi n° 2009-967 du 3 août 2009 de programmation relative à la mise en oeuvre du - Grenelle de l'environnement	Assemblée Nationale	2009	Law	24
4	Loi no 2010-788 du 12 juillet 2010 portant engagement national pour l'environnement	Assemblée Nationale	2010	Law	126
5	Pacte national de lutte contre le gaspillage alimentaire	Ministère de l'Ecologie	2013	Presentation	32
6	Pacte national de lutte contre le gaspillage alimentaire 2013	Ministère de l'Ecologie	2013	National voluntary programme	23
7	Programme national de prévention des déchets 2014-2020	Ministère de l'Ecologie	2014	National action plan	141
8	Rapport de Mission - Lutte contre le gaspillage alimentaire: propositions pour une politique publique	Assemblée Nationale	2014	Report	100
9	Loi no 2015-992 du 17 août 2015 relative à la transition énergétique pour la croissance verte	Assemblée Nationale	2015	Law	98
10	Rapport sur la proposition de loi relative à la lutte contre le gaspillage alimentaire	Senat	2015	Report	50
11	Loi no 2016-138 du 11 février 2016 relative à la lutte contre le gaspillage alimentaire	Assemblée Nationale	2016	Law	2
12	Pacte national de lutte contre le gaspillage alimentaire 2017-2020	Ministère de l'Ecologie	2016	National voluntary programme	17
13	Compte rendu de la Commission de l'aménagement du territoire et du développement durable. Bilan annuel de l'application des lois	Assemblée Nationale	2017	Report	10
14	Contrôle de l'application de la loi relative à la lutte contre le gaspillage alimentaire	Assemblée Nationale	2017	Report	1
15	Rapport d'information sur l'évaluation de la loi n° 2016-138 du 11 février 2016 relative à la lutte contre le gaspillage alimentaire	Assemblée Nationale	2019	Report	68
16	Loi no 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire	Assemblée Nationale	2020	Law	40
Total pages					802

Table 39. Summary of secondary data on the political environment.

	Title	Organization	Year	Type of document	Pages
1	Prévention de la production des déchets	ADEME	2008	Report	13
2	Bilan des connaissances économiques et environnementales sur la consigne des emballages boissons et le recyclage des emballages plastiques	ADEME	2008	Report	16
3	Développement de la réutilisation des emballages industriels	ADEME	2008	Study	16
4	La prévention de la production de déchets en grandes surfaces - Guide pratique et outils pour une mise en puvre efficace	Association des Collectivités Comtoises pour la Maîtrise des Déchets et de l'Environnement	2008	Guide	30
5	Insee Premiere N° 1200 - Les déchets des grands établissements commerciaux en 2006	Insee	2008	Study	4
6	Mon commerçant m'emballé durablement. 12 actions pour réduire les déchets par la réutilisation des emballages	Centre national d'information indépendante sur les déchets	2011	Guide	24
7	Pertes et gaspillage alimentaire	Urban Food Lab Ministry of Agriculture	2011	Report summary	6
8	La mission "Prévention des déchets et grande distribution" summary of technical meeting	Ile-de-France Region/ADEME	2012	Report	14
9	La mission "Prévention des déchets et grande distribution" working group	Ile-de-France Region/ADEME	2012	Report	66
10	La mission "Prévention des déchets et grande distribution" - Methodology for Drive	Ile-de-France Region/ADEME	2012	Fact sheet	4
11	Insee Premiere N° 1673 - Les pratiques environnementales des entreprises	Insee	2012	Study	4
12	La mission "Prévention des déchets et grande distribution" - Methodology for unpacking platforms	Ile-de-France Region/ADEME	2013	Fact sheet	3
13	La mission "Prévention des déchets et grande distribution" - Methodology for bulk	Ile-de-France Region/ADEME	2013	Report	36
14	Réduire, trier et valoriser les biodéchets des gros producteurs	ADEME	2013	Guide	132
15	La mission "Prévention des déchets et grande distribution" - Methodology for bulk	Ile-de-France Region/ADEME	2014	Fact sheet	9
16	Chiffres-clés Déchets - ed. 2014	ADEME	2014	Report	80
17	Obligation tri 5 flux	ADEME	2015	Fact sheet	5
18	Pertes et gaspillages alimentaires : l'état des lieux et leur gestion par étapes de la chaîne alimentaire	ADEME	2016	Study	165

19	La distribution engagée contre le gaspillage alimentaire	ADEME	2016	Summary	8
20	La distribution engagée contre le gaspillage alimentaire	ADEME	2016	Report	54
21	Etude d'évaluation des gisements d'évitement, des potentiels de réduction de déchets et des impacts environnementaux évités	ADEME	2016	Study	121
22	Ségolène Royale renforce la lutte contre le gaspillage alimentaire dans les grandes et moyennes surfaces	ADEME	2016	Press release	3
23	Bonnes pratiques et innovations environnementales dans le secteur de la distribution alimentaire	ADEME	2018	Guide	88
24	Distributeurs : comment éviter des coûts en réduisant vos déchets et vos pertes alimentaires	ADEME	2018	Guide	16
25	Chiffres-clés Déchets - ed. 2018	ADEME	2018	Report	31
26	Packaging's contribution to food waste reduction in France	Conseil National de l'Emballage/ADEME	2018	Report	34
27	Insee Première N° 1723 - Les réseaux d'enseigne dans le commerce de détail alimentaire	Insee	2018	Study	4
28	Mooc gaspillage alimentaire. Rapport	ADEME	2019	Report	14
29	Gaspillage alimentaire - bilan du groupe de travail "Indicateurs et mesures"	ADEME	2019	Summary	61
30	Insee Première N° 1744 - Les trois quarts des déchets du commerce sont triés	Insee	2019	Study	4
Total pages					1065

Appendix 8. Summary of secondary contextual information sources

Table 40. Summary of secondary data on industry level provided by sectoral associations.

	Title	Organization	Year	Type of document	Pages
1	Convention sur les engagements pris par les entreprises du Commerce et de la Distribution dans le cadre du Grenelle de l'Environnement	FCD	2008	Agreement on commitments	7
2	La grande distribution s'engage pour un commerce durable	FCD	2008	Press release	27
3	Convention sur les sacs des déchets biodégradables	FCD	2009	Agreement on commitments	5
4	Chantal Jouanno signe la convention pour développer les sacs à déchets en plastique biodégradable	FCD	2009	Press release	1
5	Consommation durable : des engagements aux actes	FCD	2010	Press release	23
6	Les enseignes de la distribution s'engagent à donner plus aux Restos du Coeur	FCD	2011	Press release	1
7	Convention d'engagements de la filière de collecte et de traitement des cartouches	FCD	2011	Press release	1
8	Les enseignes de la distribution expérimenteront l'affichage environnemental sur des centaines de références, dès juillet 2011	FCD	2011	Press release	1
9	Contribution des enseignes de la FCD à l'expérimentation nationale de l'affichage environnemental. Bilan et perspectives	FCD	2012	Study	56
10	Emballages responsables	Perifem/Citeo	2018	Study	17
11	Chartre d'engagements "Verre 100% solutions"	FCD/Perifem	2019	Agreement on commitments	2
12	La recherche de solutions pour la prise en charge des déchets issus des dons alimentaires par la distribution se poursuit	Perifem	2019	Briefing note	2
13	Biodéchets	Perifem	2019	Briefing note	2
14	Note rapide de suivi de la filière papier	Perifem	2019	Briefing note	2039
15	De la ressource en magasin	Perifem	2019	Study	15
Total pages					163

Table 41. Summary of secondary data – grey literature

	Title	Organization	Year	Type of document	Pages
1	Innovation et marchés de la grande distribution	Le commerce en France - Jean-Baptiste Berry	2006	Study	11
2	The EU retail sector : when is a market not a market?	AgriBusinessAccountability	2007	Policy briefing	4
3	Du gaspillage alimentaire à tous les étages	France Nature Environnement	2010	Report	43
4	Observatoire de la distribution responsable - ed. 1	FCD/ESSEC/PWC	2012	Study	13
5	Etat des lieux sur l'information environnementale	Efficient Consumer Response/Capgemini Consulting	2012	Pilot project report	32
6	Déclaration commune industrie - commerce sur l'information environnementale	Efficient Consumer Response	2012	Policy statement	5
7	Global powers of retailing - 2013	Deloitte	2013	Market report	36
8	Résultats de l'enquête sur le Gaspillage Alimentaire	Efficient Consumer Response	2014	Study	5
9	Comparative Study on EU Member States' legislation and practices on food donation	Bio by Deloitte/European Economic and Social Committee	2014	Study	78
10	Food Waste Along the Food Chain	OECD	2014	Study	29
11	Global powers of retailing - 2014	Deloitte	2014	Market report	36
12	Observatoire de la distribution responsable - ed. 2	FCD/ESSEC/PWC	2015	Study	7
13	Position statement - lobbying on competition authority	Efficient Consumer Response	2015	Position statement	3
14	Review of EU legislation and policies with implications on food waste	Fusions	2015	Study	54
15	Global powers of retailing - 2015	Deloitte	2015	Market report	44
16	Grand prix du commerce responsable	ESSEC	2016	Report	402
17	Baromètre - Les Français et la consommation responsable - ed. 2016	GreenFlex/ADEME	2016	Public opinion survey	16
18	Global powers of retailing - 2016	Deloitte	2016	Market report	48
19	Typology of new consumers	Ipsos/E.Leclerc	2017	Public opinion survey	24
20	Observatoire de la distribution responsable - ed. 3	FCD/ESSEC/PWC	2017	Study	11
21	Baromètre - Les Français et la consommation responsable - ed. 2017	GreenFlex/ADEME	2017	Public opinion survey	24

22	Actions et initiatives pour réduire le gaspillage alimentaire	Institut national de la consommation	2017	Article	3
23	Global powers of retailing - 2017	Deloitte	2017	Market report	48
24	Monitoring of REAP commitments & technical support for Retail Forum issue papers	EU - Retail Forum	2017	2017	53
25	Baromètre 2018 de la valorisation des invendus en grande distribution	Comerso/Ipsos	2018	Survey report	36
26	Grand prix du commerce responsable	ESSEC	2018	Report	406
27	Circular economy watch for retail sector	Madame Benchmark	2018	Study	47
28	Les dates de péremption, une idée dépassée?	TooGoodToGo / France Nature Environnement	2018	Round table report	40
29	Global powers of retailing - 2018	Deloitte	2018	Market report	48
30	France retail Foods Annual report 2017	USDA Foreign Agricultural Service	2018	Study	22
31	Livre blanc pour réduire le gaspillage des fruits et légumes moches	Phenix	2019	White book	24
32	Distribution/retail: objectif zéro-déchet	Comerso/Ipsos	2019	Survey report	44
33	Observatoire de la distribution responsable - ed. 4	FCD/ESSEC/PWC	2019	Study	2
34	Baromètre - Les Français et la consommation responsable - ed. 2019	GreenFlex/ADEME	2019	Public opinion survey	8
35	Emballages : prise de conscience des consommateurs	Nielsen	2019	Public opinion survey	4
36	L'achat en vrac, une habitude qui s'intalle chez les Français	Nielsen	2019	Public opinion survey	3
37	France food retail country report	Kantar	2019	Market report	22
38	Global powers of retailing - 2019	Deloitte	2019	Market report	44
39	Conférence Economie circulaire	Institut du Commerce	2019	Report	16
40	Baromètre 2020 Anti-Gaspillage et valorisation des déchets pour une économie circulaire	Comerso/Ipsos	2020	Survey report	59
41	Grand prix du commerce responsable	ESSEC	2020	Report	309
42	Catalogues promotionnels	ARMIS/Harris interactive	2020	Public opinion survey	6
43	Global powers of retailing - 2020	Deloitte	2020	Market report	45
Total pages					2214

Appendix 9. Summary of secondary sources for Auchan

Table 42. List of the secondary sources for Auchan company

	Name	Company/ Organization	Year	Type of document	Pages
1	Pierre Frisch - Directeur Environnement Auchan France « Promouvoir le développement de la qualité des produits agricoles et le Développement Durable	Auchan	2005	Webpage - Presentation	29
2	Auchan Okabé. Un magasin qui ressemble à ses clients	Auchan	2010	Press release	18
3	Rapport Développement Durable Auchan France 2011-2012	Auchan France	2012	Report	56
4	Gestion environnementale des hypermarchés	Auchan	2012	Webpage - Presentation	6
5	Découvrez les coulisses de la campagne anti-gaspi d'Auchan	Auchan	2013	Webpage - video	1
6	Auchan s'engage dans le Pacte national de lutte contre le gaspillage alimentaire avec le Ministère de l'Agriculture	Groupe Auchan	2013	Press release	2
7	Rapport d'activité et de développement responsable 2013	Groupe Auchan	2013	Report	84
8	Bilan projet pilot IdF - Auchan-Emeraude	Auchan/IdF/ Ademe	2013	Webpage - Report	8
9	Rapport d'activité et de développement responsable 2014	Groupe Auchan	2014	Report	84
10	Eqosphere une plateforme en ligne innovante pour revaloriser les surplus alimentaires et les déchets	BipiZ	2014	Webpage	2
11	Le problème du suremballage : les grandes surfaces d'Avallon respectent-elles l'Article L541-10-5 du code de l'environnement ?	Valleeducousin.fr Journal	2014	Webpage	4
12	Pledge COP21 de Groupe Auchan	Groupe Auchan	2015	Press release	2
13	Auchan et les Banques Alimentaires soufflent leur 20e bougie	Groupe Auchan	2015	Press release	2
14	Rapport RSE 2015	Auchan Retail France	2015	Report	12
15	Auchan continues its fight against food waste	BipiZ	2015	Webpage	2
16	« Fruits et légumes moches », une action Intermarché (groupe les mousquetaires) qui s'étend à d'autres enseignes avec le label « gueules cassées » contre le gâchis alimentaire	BipiZ	2015	Webpage	2
17	Auchan Retail France adopte la	Auchan Retail	2016	Press	1

	solution Recy'go de La Poste	France		release	
18	Pratique, réutilisable, échangeable à vie : Auchan Retail France propose son nouveau sac de caisse	Auchan Retail France	2016	Press release	2
19	Volet RSE du Rapport de gestion 2016	Auchan Holding	2016	Report	76
20	Auchan pourquit son engagement en faveur de l'économie circulaire	BipiZ	2016	Webpage	2
21	25 pas d'élan vers 2025	Auchan Retail France	2017	Policy statement	41
22	Lancement de la plateforme digitale RSE	Auchan Retail France	2017	Press release	2
23	Co-construction du 1er Mooc en France dédié à l'anti-gaspillage alimentaire	Auchan Retail France	2017	Press release	3
24	Cristaline et Auchan Retail France, acteurs engagés de l'économie circulaire !	Auchan Retail France	2017	Press release	3
25	Volet RSE du Rapport de gestion 2017	Auchan Holding	2017	Report	80
26	Auchan educates consumers about responsible consumption habits	BipiZ	2017	Webpage	2
27	Auchan supports the circular economy: giving our bottles a 2nd life!	BipiZ	2017	Webpage	2
28	Entretien avec Philippe Goetzmann	agriDées	2017	Webpage - Interview	3
29	Webpage "Auchan Agit"	Auchan Retail France	2018	Web platform	
30	A l'occasion de la Journée Mondiale de l'environnement, la plateforme RSE d'Auchan Retail France (www.rse.auchan-retail.fr) évolue	Auchan Retail France	2018	Press release	2
31	En novembre, j'apprends à mieux utiliser et à réparer mes appareils du quotidien avec Auchan !	Auchan Retail France	2018	Press release	2
32	Le Relais et Auchan Retail France recyclent les jeans du 24 au 30 janvier	Auchan Retail France	2018	Press release	2
33	Lancement du 1er MOOC professionnel et grand public sur le gaspillage alimentaire au SIA 2018	Auchan Retail France	2018	Press release	3
34	Auchan Retail France agit pour réduire le gaspillage alimentaire	Auchan Retail France	2018	Press release	2
35	Auchan Retail France et Cristaline s'engagent à recycler 100 millions de bouteilles plastiques dans 100% des hypermarchés Auchan d'ici 2020	Auchan Retail France	2018	Press release	2
36	Auchan Retail France prévoit le recyclage de 100% des plastiques issus de son activité d'ici à 2025	Auchan Retail France	2018	Press release	2
37	Auchan Retail France et Amorim. Partenaires Eco-citoyens d'une	Auchan Retail France	2018	Press release	2

	collecte nationale de bouchons de liège				
38	Chez Auchan on pense qu'il n'y a que quand on fait les choses que les choses changent.	Auchan Retail France	2018	Press release/ dossier	16
39	Rapport Financier Annuel 2018 et déclaration de performance extra-financière	Auchan Holding	2018	Report	168
40	Webpage dedicated to "Environnement - Préserver la planète"	Auchan Retail France	2018	Webpage	3
41	Webpage dedicated to "Environnement - Energie - une priorité renouvelée"	Auchan Retail France	2018	Webpage	2
42	Webpage dedicated to "Environnement - Développer l'économie circulaire"	Auchan Retail France	2018	Webpage	3
43	Loi Garot contre le gaspillage : Bons résultats mais peut mieux faire	CCI Le Mans	2018	Webpage - article	2
44	Veille Economie circulaire - Enseignes de la Grande Distribution - Le temps de rendre l'information transparente et comparable	Madame Benchmark	2018	Webpage - report	4
45	Auchan Retail France a signé le 21 février le Pacte National sur les emballages plastiques	Auchan Retail France	2019	Press release	2
46	Auchan Retail France, acteur historique de la lutte contre le plastique	Auchan Retail France	2019	Press release	3
47	Auchan Retail France met en ligne son nouveau site RSE	Auchan Retail France	2019	Press release	2
48	Rapport d'activité 2019 - Le commerce en question(s)	Auchan Retail France	2019	Report	29
49	Rapport Financier Annuel 2019 et déclaration de performance extra-financière	Auchan Holding	2019	Report	176
50	Auchan - consigne des bouteilles plastiques: bilan de l'expérimentation à Brives	Perifem	2019	Webpage - article	1
51	Développement durable - Parole d'entreprise - Christophe Jolivet, Directeur Auchan Saint-Herblain	CCI Nantes St-Nazaire	2019	Webpage + video	2
Total pages					961

Appendix 10. Summary of secondary sources for E.Leclerc

Table 43. List of the secondary sources for E.Leclerc company

	Name	Company / Organization	Year	Type of document	Pages
1	Suremballage, gaspillage, surconsommation d'énergie Du concret !	E.Leclerc	2005	Blog article	9
2	Le député Wauquiez, la main dans le sac !	E.Leclerc	2005	Blog article	11
3	E.Leclerc - Affichage CO2 des produits	E.Leclerc	2008	Blog article	15
4	Plan Climat Nord Pas de Calais Fiche "J'économise ma planète : l'affichage CO2 dans les centres E. Leclerc de la métropole Lilloise »	GreenTag	2010	Action plan	9
5	Consommation responsable _ un engagement global d'enseigne pour éviter la dispersion	E.Leclerc	2011	Blog article	5
6	Le Mouvement E.LECLERC	E.Leclerc	2011	Press releases - dossier	33
7	Lancement des Alliances en Nord	E.Leclerc	2011	Press releases - dossier	11
8	Gasillage : vraies et fausses solutions	E.Leclerc	2012	Blog article	18
9	Bilan projet pilot IdF - E.Leclerc - SMITOM Lombric	E.Leclerc/IdF/Ademe	2013	Webpage - Report	8
10	E.Leclerc et le sourcing responsable : des partenariats concrets	E.Leclerc	2014	Blog article	4
11	Les magasins E.Leclerc valorisent les produits éco responsables de leurs fournisseurs	BipiZ	2014	Webpage	2
12	Eqosphere une plateforme en ligne innovante pour revaloriser les surplus alimentaires et les déchets	BipiZ	2014	Webpage	2
13	Malbouffe et sécurité alimentaire (1) : des emballages dangereux ?	E.Leclerc	2015	Blog article	5
14	E .Leclerc et les enseignes de la distribution engagées pour réduire le gaspillage alimentaire	BipiZ	2015	Webpage	2
15	« Fruits et légumes moches », une action Intermarché (groupe les mousquetaires) qui s'étend à d'autres enseignes avec le label « gueules cassées » contre le gâchis alimentaire	BipiZ	2015	Webpage	2
16	E.Leclerc et l'ESCP-Europe créent une chaire d'enseignement à Paris	E.Leclerc	2016	Blog article	5
17	E.Leclerc pour la planète - manifeste	E.Leclerc	2016	Policy statement	3
18	E.Leclerc Développement durable Le mag	E.Leclerc	2016	Report	13
19	Lutte contre le gaspillage alimentaire	E.Leclerc	2016	Webpage - article	3
20	L'efficacité énergétique des magasins E.Leclerc	E.Leclerc	2016	Webpage - article	2

21	Programme "Zéro déchet" E. Leclerc	E.Leclerc	2016	Webpage - article	2
22	L'Eco-conception par la Marque Repère	E.Leclerc	2016	Webpage - article	2
23	Marque Repère - Nos valeurs	E.Leclerc	2016	Webpage - article	8
24	Marque Repère - Notre démarche environnementale	E.Leclerc	2016	Webpage - article	12
25	Banques alimentaires	E.Leclerc	2016	Webpage - article	2
26	E.Leclerc et la suppression des sacs de sortie de caisse	E.Leclerc	2016	Press releases - dossier	15
27	Leclerc pour la planète ? Lapreuve par sa MarqueRepère	E.Leclerc	2017	Blog article	4
28	Réputation des marques :entrepreneurs, engagez-vous !	E.Leclerc	2017	Blog article	3
29	Devenir Leader du développement durable	E.Leclerc	2017	Webpage - article	3
30	1 prospectus E.Leclerc rapporté en magasin = 2 centimes pour la recherche	E.Leclerc	2017	Webpage - article	2
31	Avec la FEEF, E.Leclerc signe un partenariat très orienté RSE	E.Leclerc	2018	Blog article	4
32	La politique est-ellenuisible à l'écologie ?	E.Leclerc	2018	Blog article	3
33	Zéro déchet, zéro gaspillage : c'est possible !	E.Leclerc	2018	Blog article + Video/retranscription	2
34	La FEEF1 et E.Leclerc signent un nouvel accord très orienté RSE	E.Leclerc	2018	Press release	2
35	État des lieux 2018 - Nos engagements pour une consommation responsable	E.Leclerc	2018	Report	24
36	Devenir leader pour mieux servir le consommateur : la preuve par les chiffres	E.Leclerc	2018	Webpage - article	2
37	Veille Economie circulaire - Enseignes de la Grande Distribution - Le temps de l'action et de la communication prudente	Madame Benchmark	2018	Webpage - Report	4
38	E.Leclerc et France NatureEnvironnement unis pourla Haute ValeurEnvironnementale	E.Leclerc	2019	Blog article	3
39	Consigne _ expérimentation de nouvelles solutions chez E.Leclerc	E.Leclerc	2019	Blog article	4
40	Lutte contre le gaspillage _ un mauvais exemple ne fait pas une politique	E.Leclerc	2019	Blog article	3
41	Les E.Leclerc d'Occitanie luttent contre le plastique	E.Leclerc	2019	Blog article + Video/retranscription	2
42	Campagne Marque Repère - Réduisons le plastique	E.Leclerc	2019	Blog article + Videos/retranscriptions	2
43	Performances commerciales : E.Leclerc poursuit sa croissance en 2018	E.Leclerc	2019	Press release	2

44	E.Leclerc organise cet été en partenariat avec Bic une collecte de stylos usagés pour les recycler	E.Leclerc	2019	Press release	2
45	Le Mouvement E.Leclerc inaugure le nouvel outil logistique de Socamaine à Champagné dans la Sarthe.	E.Leclerc	2019	Press release	3
46	Les Centres E.Leclerc d'Occitanie testent un système pour encourager le recyclage du plastique	E.Leclerc	2019	Press release	2
47	Filières agricoles & Marque Repère : E.Leclerc annonce 3 nouveaux partenariats	E.Leclerc	2019	Press release	2
48	SCA Ouest - Rapport DEPF 31-12-2018 - SITE.pdf	E.Leclerc	2019	Report	39
49	Achères : c'est le retour de la consigne	Perifem	2019	Webpage - article	1
50	Rapport RSE 2021 du Mouvement E.Leclerc	E.Leclerc	2021	Report	38
Total pages					359

Appendix 11. Description of research cases

The description of ten cases is based on the reconstruction of trajectories regarding nonmarket interactions based on self-regulation for each company within a specific domain.

Regarding nonmarket strategy, contextual elements are particularly relevant to understanding mechanisms' functioning mode. This appendix presents intermediary results of research by positioning self-regulation activities in the broader spectrum of regulatory, competitive, and societal contexts. The detailed narrative descriptions of nonmarket interactions between companies, their competitors, and social or political actors, together with their evolution over time, are presented in the following sub-sections. The study is focused on French retailers' voluntary environmental practices and more precisely on activities aimed at waste prevention and management. The trajectories are drawn from collected data and illustrated by initiatives implemented by two different companies - Auchan and E.Leclerc - regarding the following issues: food waste and food donations, plastic policy, packaging, environmental labelling and information provision.

Self-regulation of food waste-related issues

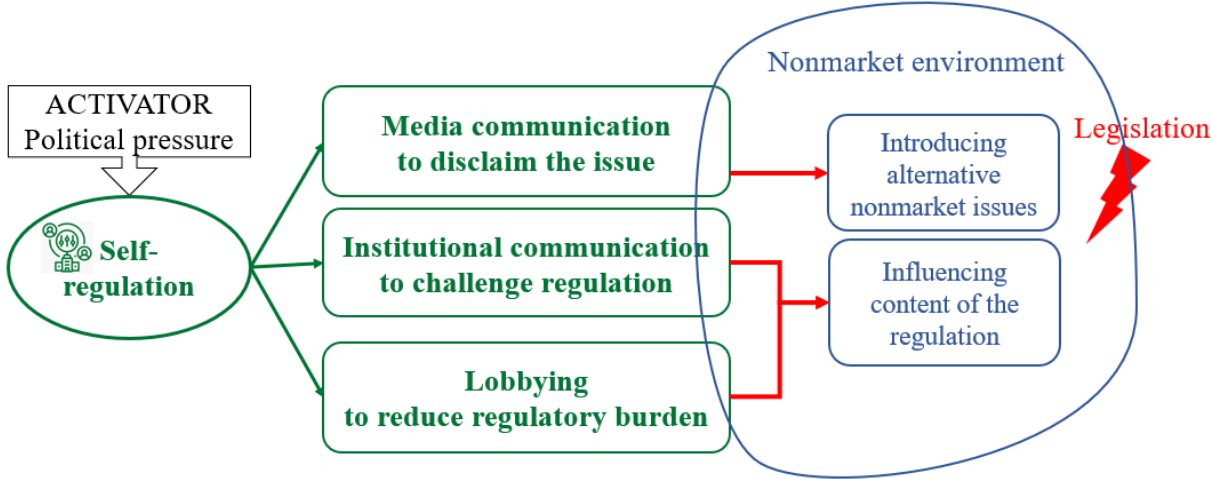
This sub-section presents the nonmarket context of anti-food waste regulations' implementation and engagements undertaken by Auchan to cope with the issue.

Case 1 - FoW-A – mobilising self-regulation to challenge the legislative proposal –
example of Auchan regarding anti-food waste policy

As food waste becomes a topic of high profile, multiple nonmarket actors engage in to fight against it. The authorities encourage companies in the retail sector to sign collective voluntary commitments that is finally established in 2013. However, the representatives of civil society and some politicians continue claiming for regulation. They launch an online petition that quickly gathers a significant number of supporters. Simultaneously, representatives of the National Assembly conduct a study to formulate legislative

propositions. Due to a strong political will the issue moves quickly through consecutive stages of the nonmarket issue life cycle. Throughout the year 2015, a few successive attempts to legislate on the issue fail but the policy decision-makers remain determined to pass the law. It is finally put in place at the beginning of 2016.

Figure 33. Case 1 – Food Waste - Auchan



Under external pressure (exerted by civil society, politicians and legislative authorities), the company communicates on self-regulation through different channels to reach various stakeholders. The existing and well-established self-regulation allows the company to quickly answer the external pressure and position itself in the political arena. First of all, the long-run engagement of the company, also on the European level, against food waste is promoted in the media. Auchan highlights the discrepancy between draft legislation and established practices, i.e. discounting and dynamic shelf life, donations, onsite transformation, and energy recovery.

The company points out a significant delay in implementing potential regulations regarding the actual activities undertaken to prevent food waste. Auchan publicly challenges proposals for new legislation as inadequate, even redundant, and endeavours to demonstrate politicians' ignorance and incomprehension of how the industry works.

Also, Auchan leverages on own self-regulation experience to argue the legislative proposal. While facing a regulatory threat, the company rely on its self-regulation experience to acquaint political decision-makers with its daily practices via individual lobbying (i.e. participation in parliamentary hearings). Further, it provides information needed to carry out collective action by a sectoral association - industry lobbying. However, the company’s official position is to support the legislation and all the different initiatives that could be taken

by the public authorities (reflection on expiry dates, fruit and vegetable sizing obligations, awareness campaigns, etc.).

To sum up, this example shows how self-regulation is leveraged in the nonmarket context characterised by a regulatory threat accompanied by a strongly stated political will to act/legislate on the issue. While companies are firmly encouraged to engage voluntarily to implement specific practices, the regulatory threat is serious. In addition, social pressure is exerted to legislate quickly. The issue is largely mediatised and public expectations of retailers to act against food waste rise. Thus, it is considered that in addition to political pressure, both direct and indirect social pressure are exerted on the company. Ultimately, the law is established, and companies seek beyond-compliance solutions.

In such a context, the company demonstrates that it can mobilize self-regulation to challenge the legislative proposal. While accepting the principle of regulation, Auchan focuses its lobbying effort on moderating the stringency of the regulation (obligation of means instead of an obligation of results). As the issue life cycle is in an advanced phase, actions undertaken in media targeting public opinion and aimed at reducing issue saliency seem ineffective.

Donations

This sub-section presents the nonmarket context of collective voluntary engagement relative to donations and two slightly different trajectories undertaken by companies to cope with the issue.

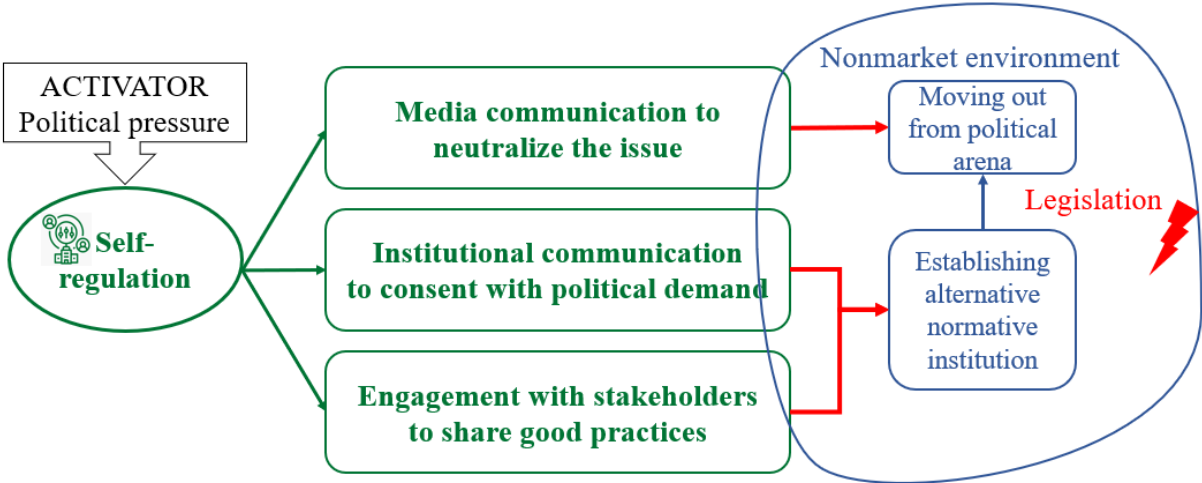
After the invalidation by the Constitutional Court of amendments regarding food waste in the Energy Transition bill, the Ministry of Ecology calls on companies to take over the censured provisions in the framework of a voluntary agreement. The political pressure is at its highest and strongly mediatised. It is the beginning of harsh media exchanges on the topic lasting about two weeks.

Finally, the Ministry obtains a series of commitments from retailers regarding a ban on the destruction of unsold food that can be consumed, an impossibility for manufacturers to prohibit the donation of private label products, and a generalisation of donation agreements to an authorised food aid charity (for all stores of more than 400 m²). The sectoral association

FCD is glad that the voluntary commitment allows retailers to avoid imposing the solutions through the law. On the other hand, the government commits to a certain number of measures such as the promotion of retailers’ initiatives, or the provision of a regularly updated list of charities eligible for donations, among others. In parallel, the food aid associations emphasize the importance of the state’s engagement to maintain subsidies and support for donations in a long term.

Case 2 - Don-A – mobilising self-regulation to move out of the political arena – example of Auchan regarding food donations

Figure 34. Case 2 – Donations - Auchan



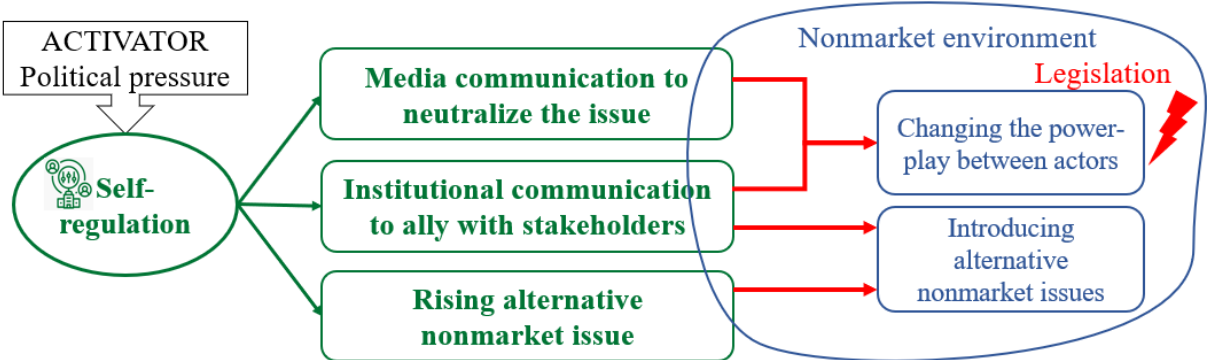
The controversy on the issue gives the company an occasion to highlight the actions that have been implemented for over a decade⁴¹. In its response to political pressure, Auchan publishes an official declaration with immediate consent to a voluntary agreement. In a media campaign, the company positions itself as the pioneer of food donations among retailers and announces being ready to satisfy the Ministry’s demand. Also, it reminds that company has already implemented the expected commitments and claims that 100% of Auchan hypermarkets practice daily donations to various associations. In local media Auchan demonstrates that introducing new prescriptions (whether voluntarily or through new legislation) does not significantly change their practice.

⁴¹ In 2015, the donations of unsold goods (food and non-food) are practiced by all Auchan’s hypermarkets and significant number of smaller stores. The company celebrates 20th anniversary of national partnership with the biggest food aid association in France.

Auchan states being in favour of a pragmatic approach. It wishes to leverage actions already undertaken, to share good practices and structure the process on a sectoral level. As the bill followed voluntary engagement, the company’s effort was focused on achieving regulations coherent on a sectoral level.

Case 3 - Don-EL – mobilising self-regulation to change the political arena landscape – example of E.Leclerc regarding food donations

Figure 35. Case 3 – Donations – E.Leclerc



Food donations are set up by a significant number of E.Leclerc stores, but the practice remains uneven within the group. In reaction to Ministry’s appeal, media communication consists of undermining the credibility of policymakers (the Ministry Ségolène Royale is tackled personally). It is aimed at demonstrating the existing voluntary engagements to fight food waste and underlines their drawbacks in terms of donations⁴². The company multiplies in media examples of stores donating food to local associations.

Moreover, E.Leclerc attracts policymakers’ attention to the situation of other actors in the retail sector for whom the fiscal leverage for encouraging donations is not sufficiently advantageous. Also, the company works for bringing new entities into political debate. It insists on the underdeveloped ecosystem for donations and asks the state to allocate more resources to claims for associations. This approach results in new entities (associations, local authorities) entering the political arena and aligning with E.Leclerc. As consequence, retailer builds up a coalition together with some NGOs against potential restrictive legislation.

⁴² By improving the efficiency of own anti-food waste policy, stores deprive the food aid associations of donations received so far (less volume or lower quality).

In addition, E.Leclerc rises in political debate on an alternative issue linked to food waste and opens a new front for nonmarket action. E.Leclerc expects the government to mobilise the European Commission and its counterparts, in order to change the regulations on the use-by date or the rules regarding size sorting for fruits and vegetables.

Once the law passed, the previously observed approach of individual shops to donations policy is reinforced: some search for innovative beyond-compliance solutions, while those so far reluctant to food donations adopt the wait-and-see position in the absence of sanctions.

In conclusion, the issue of donations is of high intensity starting with a political appeal for the food retail sector to act and ending with a collective voluntary engagement. In fact, while facing the same external pressure, Auchan and E.Leclerc present two different approaches to cope with the situation.

Auchan participates voluntarily in initiatives promoted by public authorities – national pact, pilot projects and voluntary agreement – and capitalize on their previous experience. It wishes to influence the practice uptake on a sectoral level and to further establish a common sectoral standard. Attempts to neutralize the issue among the general public and to establish alternative normative institution through collective voluntary engagement are aimed at moving out of the political arena. The representatives of the company are convinced that it would stop the legislative procedure and avert the regulatory threat.

E.Leclerc's arguments used in a political debate are aimed at mobilising other actors (shifting responsibility or showing the negative externalities) to make them enter the political arena or move their position on the issue. Also, the company opens a new front of the political bargain by rising an alternative nonmarket issue.

Self-regulation of plastic-related issues

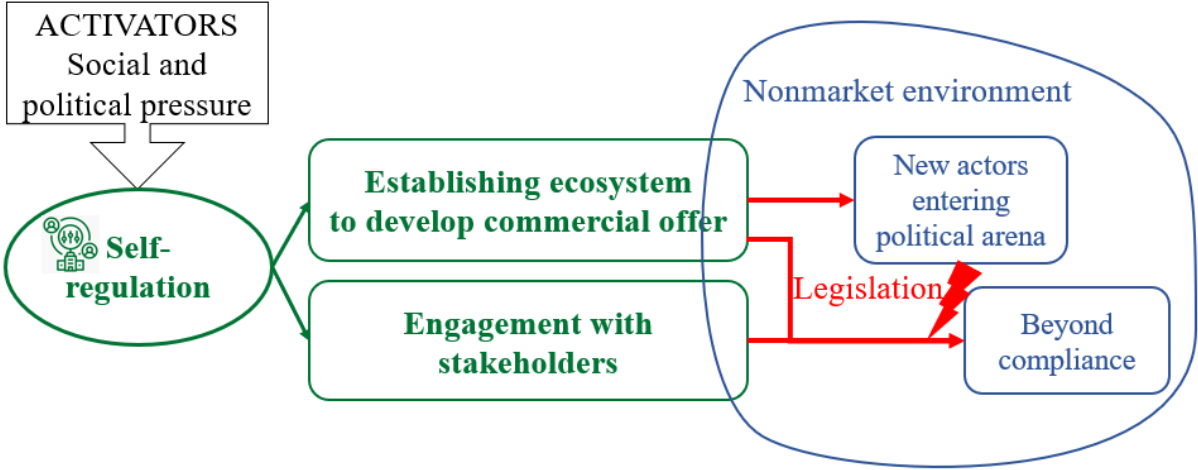
This sub-section presents the nonmarket context of plastic policy and trajectories undertaken by Auchan and E.Leclerc to cope with the issue.

The topic of plastic use by companies is multi-faceted. Retailers develop their plastic policy regarding the following issues: packaging, product display, items to sell, and equipment. Over the decade, sparse initiatives to better manage plastic waste, have been developed by retailers. As far as misuse of plastic is concerned, the progressive reduction of

single-use plastic bags usage and single-use plastic items provision was introduced by consecutive laws. The major effort was targeted at single-use plastic bags and their replacement with other types of bags. Also, some retailers, together with local associations and lately beverage industry, initiated actions on collecting plastic caps and bottles. However, in global terms plastic has been considered by sectoral associations as a nonmarket issue only from 2018 on. Plastic was the subject of workshop themes within the framework of the Circular Economy Roadmap. Also, 100% recycled plastic was in the political program of a candidate for presidency Emmanuel Macron. After his election in 2017, it has become one of the important issues. Consequently, about 2018, the plastic issue emerged as a political and social concern. It was due to different reasons: social pressure from NGOs⁴³, mediatisation of ocean pollution by micro-plastic⁴⁴ and higher issue awareness within the large public, together with the political will to focus on the issue.

Case 4 - Pla-A – mobilising self-regulation to engage other actors in the political arena - example of Auchan regarding plastic policy

Figure 36. Case 4 – Plastic - Auchan



⁴³ For instance: Expedition 7^e continent - <http://www.septiemecontinent.com/>; GreenPeace – série Documents clés, article *Pollution des océans : l'impacte des plastiques* published on March 2018 and *Pollution plastique – changeons de modèle économique* published on August 2018 (retrieved on April, 22nd 2019) <https://www.greenpeace.fr/pollution-oceans-limpact-plastiques/>

<https://www.greenpeace.fr/pollution-plastique-changeons-de-modele-economique/>

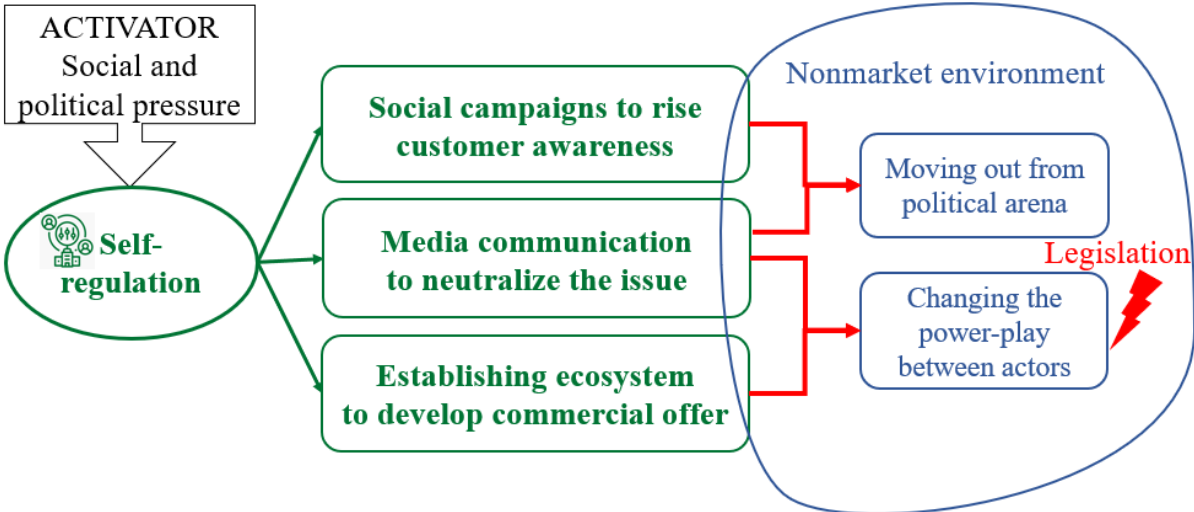
⁴⁴ French nation television program *Cash investigation* issued in September 2018 – *Plastique : la grande intox* <https://www.youtube.com/watch?v=wZT3drAYIzo>

Auchan self-regulations while perceiving weak signals from society. In the early 2000s, the company has undertaken a few initiatives to limit the distribution of plastic bags for free. Later on, Auchan establishes an industrial partnership and develops innovative, sustainable solution aimed at plastic reuse. The company develops a commercial offer based on substantial self-regulation and aligned with political and social expectations. It is further mobilised as a market differentiation factor.

With time, external pressure rises and is replaced by regulatory threat. Eventually, several laws are introduced to reduce the use of plastic in the economy. Consequently, the company gradually expands its self-regulation to different usages of plastic (bags, bottles, and other items). Auchan creates together with its suppliers (i.e. TTPlast, Roxane) dedicated circular ecosystems and leaves them an active role in the political bargain. It deliberately renounces lobbying against prescriptions and tends to benefit from beyond-compliance behaviour. The company further engages in a multistakeholder initiative to reaffirm its voluntary engagement and to work within a network of companies to innovate and promote plastic reuse.

Case 5 - Pla-EL – mobilising self-regulation to change the political arena landscape – example of E.Leclerc regarding plastic policy

Figure 37. Case 5 – Plastic – E.Leclerc



E.Leclerc demonstrates existing long-term and substantial self-regulation. It highlights efforts that have been undertaken for over 20 years to limit and eventually stop the distribution of single-use plastic bags. Thus, in the political debate, it positions itself as “not

concerned” and does not participate in concentrations. Self-regulation is mobilized as buffering nonmarket strategy. In media, it communicates on a discrepancy between legislation and reality - the law being introduced with a significant delay regarding the initiatives undertaken by the company.

As the issue of plastic use reduction modifies its scope (moving from plastic bags to all plastic), the company clearly states its willingness to act upon all types of plastic usage. However, it raises the argument of respect for contractual engagements with suppliers and the difficulties that they might have to comply with new stringent regulations. E.Leclerc positions itself as the leader of the trans-sectoral collective movement to defend its partners in the value chain.

To recapitulate, over time, Auchan company had presented a coherent plastic policy intended at promoting reuse and recycling while not necessarily opposing itself to the use of plastic overall. Also, for the last two years, contrary to the general effort in reducing the use of plastic, the company recognizes that the sanitary context has induced an appeal to additional over-packaging and disposable items. While sometimes Auchan gives the impression of going against the grain of political and social expectations, it follows a coherent policy and respects the rule of not communicating excessively.

The approach of E.Leclerc group to plastic policy is characterised by the will to response to contradictory signals (sanitary concerns, sustainability of supply chain, marketing issues and stores’ willingness to attract more buyers). This merchant approach to ecological self-regulation focused on clients’ needs and expectations coupled with the integration of upstream partners seems to be typical to E.Leclerc group. The company’s frontman is highly active in media and often speaks up on societal issues, but in general, the group carry on rather discreet activities in the political arena.

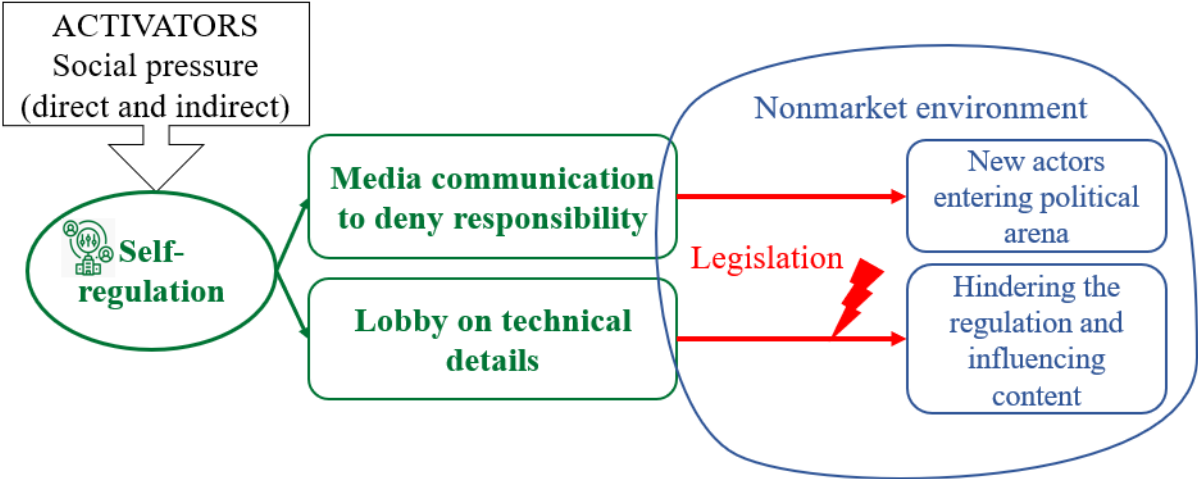
Self-regulation of packaging-related issues

This sub-section presents the nonmarket context of packaging policy and trajectories undertaken by Auchan to cope with different aspects of the issue: overpackaging, unpacking platforms at checkout, and quality of recycled packaging.

From a practical standpoint, the main packaging functions are the protection and conservation of the contained product. Moreover, there is obviously a marketing function that comes on top of facilitating the use. Also, the packaging is important in terms of transport and storage with the functions of regrouping several consumption units and conceiving the logistic units. Last but not least, packaging responds to another major function which is regulatory support⁴⁵. As a consequence, retailers have to respond to contradictory injunctions and diverse expectations expressed by various stakeholders in the market and nonmarket environments. For instance, 86% of French people believe that packaging has a role to play in protecting the planet, but they are not sufficiently informed about its real environmental impact. However, the issue of more sustainable packaging remains important only for specific categories of consumers⁴⁶. Thus, while continuing to work on greener packaging, retailers cannot afford to focus entirely on its ecological aspects.

Case 6 - ReP-A – mobilizing self-regulation to influence the content of executive acts – example of Auchan regarding substances in recycled packaging

Figure 38. Case 6 – Recycled Packaging - Auchan



A national section of European NGO Foodwatch issues a report tackling different companies on hazardous substances, potentially dangerous for consumers, in their packaging.

⁴⁵ Conseil National de l’Emballage, a series of reports « Pour...quoi s’emballer ? », <https://conseil-emballage.org/publications/>.

⁴⁶ Yougov survey conducted in January 2020 for Smurfit Kappa, <https://www.smurfitkappa.com/fr/events/journees-emballage-durable-et-responsable>

Auchan is concerned as one of the worst cases among studied producers (manufacturers and retailers as to their own brand products). The NGO launches a “name-and-shame” campaign.

Auchan replies directly in the media admitting being aware of the issue but still working on the best solution to modify its packaging. Internal self-regulation policy is not well established. The company communicates to exempt oneself from responsibility as the law in force is respected. It uses the argument that the packaging is made of recycled materials, and depicts social demand as exaggerated.

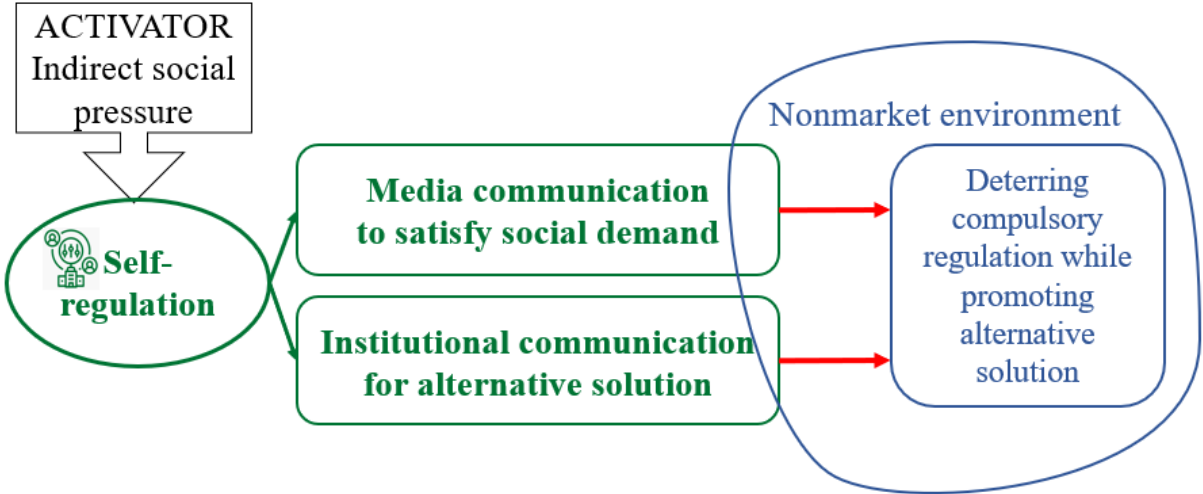
Foodwatch renews its test and while judging unsatisfactory Auchan’s actions to solve the problem, the association reiterates the “name-and-shame” campaign. It also fills in the official complain to executive authorities claiming the withdrawal of concerned products.

The NGO and the company share a complementary approach towards political decision-makers. Both call on public authorities to regulate the issue (the French government for the former and the European Commission for the latter). While Foodwatch wants manufacturers to be obliged to prevent food contamination by mineral oils hydrocarbons (zero tolerance), Auchan asks for clearer regulations (establishing thresholds, and setting up comparable and uniform methods of analysis). The NGO continues to regularly realize food quality controls and intensely advertise its results. It also decides to lobby directly on the EU level and launches an international petition.

As French policymakers seize the issue and the regulatory threat becomes real, Auchan joins collective action. The sectoral lobby has an ambiguous position of accepting the principles but exempting retailers from responsibility (shifting the responsibility onto packaging manufacturers) and lobbying on the detailed content of executive acts regarding the transition period and verification measures. The political activities are aimed at hindering the regulation, and influencing regulatory content of executive acts, as well as bringing new entities into political debate.

Case 7 - OP-A – mobilising self-regulation to introduce alternative solution – example of Auchan regarding overpackaging

Figure 39. Case 7 – Overpackaging - Auchan



A civic initiative (online petition) requesting European regulation against overpackaging is launched in France. The issue quickly spreads on social media and expands to other countries. Indirect social pressure is exerted on Auchan in the presence of self-regulation. Also, the company is accused of non-respect for its earlier voluntary commitments.

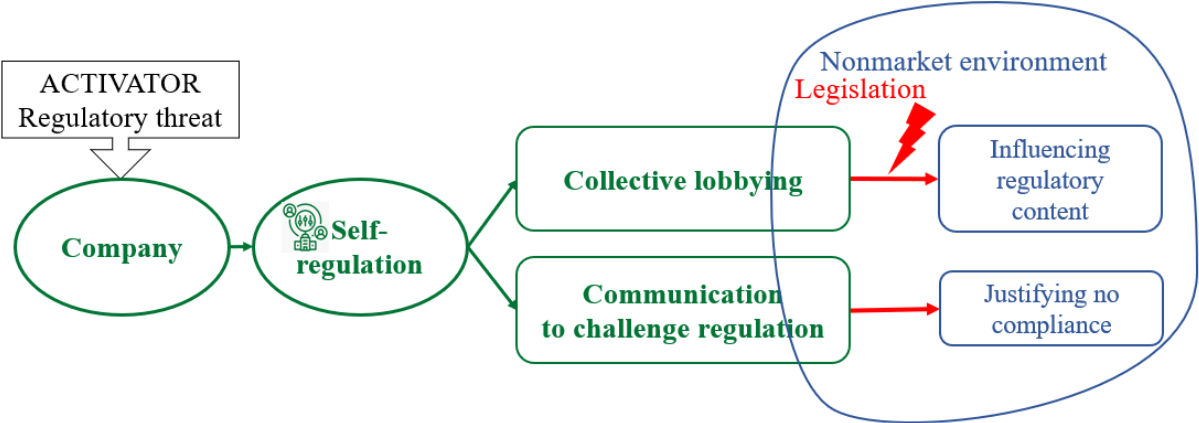
Auchan engages in media campaigns targeting the general public in France. The company demonstrates existing progress in reducing overpackaging from its own-brand products in order to satisfy social demand. Also, its institutional communication insists on the fact that social demand for more sustainable packaging remains contradictory to consumer behaviour⁴⁷. Consequently, the company decides that it is more appropriate to act upon consumer awareness instead of imposing compulsory regulation. Thus, it works on attracting NGOs and policymakers’ attention to the responsibility of other actors. The focus moves from retailers to other actors – customers and manufacturers – and other potential solutions rise in political debate.

⁴⁷ To reinforce its argument, Auchan provides a concrete example of its self-regulation initiatives. As the company preceded to removal of cardboard box from toothpaste, it registered a drop in sales due to the modified packaging.

Eventually, the number of signatures required under the European Citizens' Initiative has not been obtained. Furthermore, in France, an NGO entered the nonmarket arena and positioned itself as more legitimate to lobby on the issue. It claimed to be more efficient in the political arena (on the national level) than a civic initiative built from scratch.

Case 8 - Che-A – mobilising self-regulation to challenge the law and justify no compliance – example of Auchan regarding unpacking platforms at the checkout

Figure 40. Case 8 – Checkout - Auchan



Under regulatory threat, Auchan conducts a pilot project that turns out to be dissatisfactory. The attempt to neutralize the issue by establishing self-regulation fails and the regulatory threat is still present. Other retailers’ self-regulatory initiatives bring similar results and, as collective action was judged more likely to succeed, the FCD lobbies against the compulsory creation of “unpacking platforms”. The federation manages to modify the scope of the application without challenging the principle.

Auchan decides to deliberately not comply with the law - taking a wait-and-see position during the period between the promulgation of the law and issuance of application decrees. However, the regulation is not enforced (executive authorities neither control nor sanction companies that do not respect the law). Auchan deliberately fails to comply, as do other companies. For a decade, the regulation on “unpacking platforms” has remained a dead letter.

Political decision-makers attempt to reiterate the regulation and it is again discussed while proceeding draft of the Circular Economy Law. The company communicates regarding the incompatibility between the law and the existing waste recovery system. Despite retailers’

efforts, the issue is always considered by political decision-makers. Under such circumstances, Auchan decides to abandon lobbying against the reiteration of the prescription deeming the issue as secondary and not worth further effort (in the light of other legislative challenges).

Currently, the regulations require shops with a sales area over 400 m² to set up “unpacking platforms” but still, the law is largely not respected.

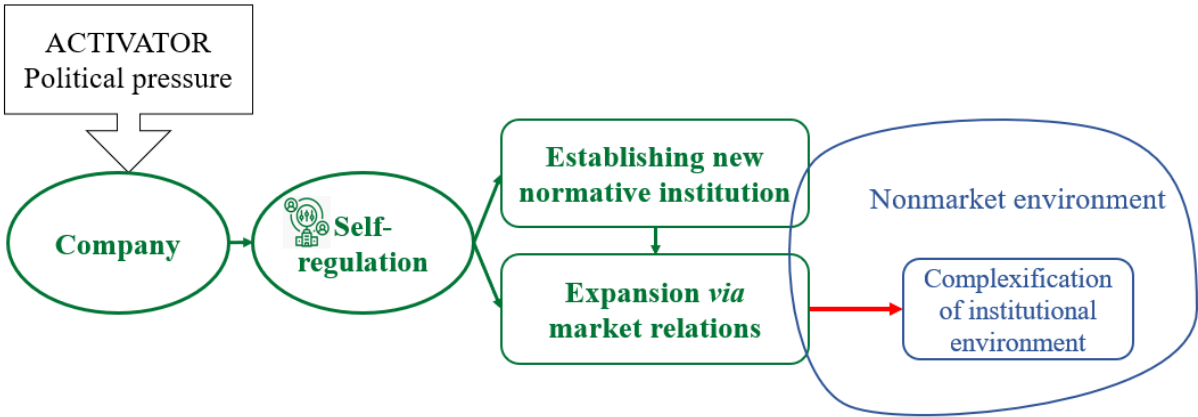
In conclusion, Auchan mobilizes self-regulation to respond to various types of external pressure. It uses the self-regulation argument in both media and institutional communication. Also, the company leverages its voluntary initiatives to engage in collective action and lobby via the sectoral federation. It is demonstrated that self-regulation can be mobilised to considerably different objectives: hindering regulation, influencing its content or resisting its implementation.

Self-regulation of information provision and labelling-related issues

This sub-section presents the nonmarket context of information provision on sustainability characteristics of products and labelling policy. It further exposes trajectories undertaken by E.Leclerc to cope with the issue.

Case 9 - Lab-EL – mobilising self-regulation to introduce alternative normative institution – example of E.Leclerc regarding information provision and labelling

Figure 41. Case 9 – Labelling – E.Leclerc

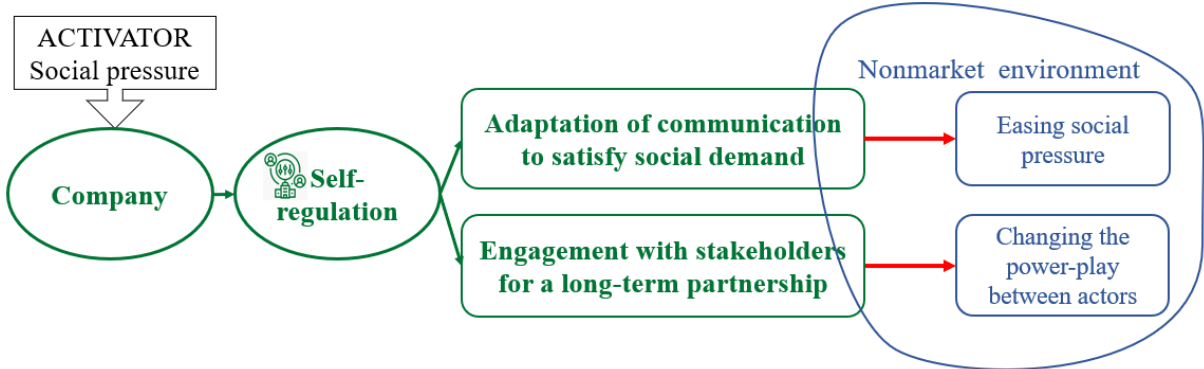


The political will to act upon the issue of environmental rating and information provision is clearly stated and the national pilot project is launched. E.Leclerc does not self-regulation specifically on the issue, although it had previously taken disparate initiatives. It decides to act but refuses participation in the collective project under public agency supervision. Instead, it establishes its own alternative information scheme.

The label established by E.Leclerc takes into consideration over 40 criteria and is based on manufacturers' declarations regarding products' characteristics. Thus, self-regulation initiative induces modification of relations with stakeholders (suppliers, customers). As a consequence, it increases the complexity of both market and nonmarket environments and attenuates regulatory threats.

Case 10 - ReP-EL – Mobilising self-regulation to modify stakeholder relations – example of E.Leclerc partnership with Foodwatch

Figure 42. Case 10 – Recycled Packaging – E.Leclerc



The Foodwatch exerts direct social pressure on the company when self-regulation does not exist. Actors are open to collaboration. The NGO launches a “naming and shaming” campaign in the media regarding misleading product information. In addition, it mobilises consumers with an online petition.

E.Leclerc decides to satisfy social claims with the least costs by adapting its communication and marketing (becoming more transparent and changing the information on packaging instead of modifying ingredients and product composition).

The company and the association set up a partnership focused on information transparency and food quality, which allows E.Leclerc to improve its policy and advertise the collaboration with other nonmarket actors. Further, the company decides to integrate FoodWatch into its “stakeholders panel” – an advisory body that helps the group to develop sustainable policies. This self-regulation under social control increases the firm’s legitimacy, while the NGO releases pressure and renounces its adverse position.

To summarise, E.Leclerc is proactive in the nonmarket environment, especially regarding relations with social actors. The company carry strong convictions in terms of sustainable development. The communication is personified, and the group is embodied mainly by its CEO who is very active in the media. While pressure from different stakeholders results in many contradictory signals imposed on the retailer, the specificity of E.Leclerc is to present an integrative approach to self-regulation and to largely communicate via different channels with the voice of its chairman. Even though on the store level the practices remain uneven, the central office collaborates with various stakeholders in the market and non-market environments to align divergent interests.

Appendix 12. Auchan’s nonmarket interactions - food waste issues

For the last decade, following international tendencies⁴⁸, French authorities have made the fight against food waste a national priority. In 2008, ADEME carried out a pilot project to evaluate the carbon footprint of food retailers. Evidently, the participants were not aware of the scale of the food waste problem. At that time, the food waste issue was not targeted but turned out to be a critical savings opportunity and leverage to limit the general environmental footprint. From 2012 on, it has become a dominant issue in public debate, strongly induced by the public authorities. Clearly stated political will made it a “national concern”. The fight against food waste is at the crossroad of health, environmental and trade policies, as the legislation on food products is stringent for sanitary reasons. Food retailers have long been a privileged target for politicians and activists fighting against food waste, mainly due to their value chain position.

In October 2012, Auchan was already the first French retailer to sign the commitment to fight against food waste at the Retail Forum in Brussels. The company signed the Retailers' Environmental Action Programme⁴⁹ and still remains an active member of the European Retail Forum for Sustainability⁵⁰ – a platform animated by the European Commission.

⁴⁸ In 2011, food waste has become considered as political issue, after publication of report “Global food losses and food waste – Extent, causes and prevention” by United Nations agency (FAO. 2011. Global food losses and food waste – Extent, causes and prevention. Rome <http://www.fao.org/3/mb060e/mb060e00.pdf> retrieved on Oct, 10th 2019.) At the end of 2011 a “Report on how to avoid food wastage: strategies for a more efficient food chain in the EU” was presented by Committee on Agriculture and Rural Development of European Parliament. Also, two months later, European Parliament voted a resolution of 19 January 2012 on how to avoid food wastage: strategies for a more efficient food chain in the EU (2011/2175(INI)). The year 2014 was established a European Year of Combating Food Waste.

⁴⁹ Retailers’ Environmental Action Programme - terms of reference

https://ec.europa.eu/environment/industry/retail/pdf/reap_tor.pdf

Retrospective Assessment of Changes in Performance of REAP Signatories

<https://ec.europa.eu/environment/industry/retail/pdf/Retrospective%20Assessment%20of%20REAP%20performance%202009-2014.pdf>

⁵⁰ The Retail Forum for Sustainability main webpage
https://ec.europa.eu/environment/industry/retail/index_en.htm

The contributions of stakeholders within forum are structured in 3-years work plans, and each year different issues are tackled, for instance: 2010 – labelling, 2011 – waste minimisation and packaging optimisation, 2013 - CSR Reporting/Environmental management, 2014 - Greening the Supply Chain/Cradle-to-cradle. The progress of goal achievements is tracked by independent third-party and communicated in transparent manner on the Forum’s website.

In France, the real political impetus for the fight against food waste was given at the end of 2012 by Stéphane Le Foll and Guillaume Garot when the two ministers announced the preparation of a plan to combat food waste. Multiple actors (national and regional agencies, local authorities, associations, the food industry, retailers, restaurants, and specialised start-ups) have been engaged to move forward in the fight against wastefulness and raise consumer awareness. ADEME – French Agency directly supported many initiatives and pilot projects for Ecological Transition⁵¹.

National Pact against food waste took the form of collective voluntary commitment⁵². The representatives of food retailers, including Auchan, and E.Leclerc, among others, as well as FCD (in parallel to individual commitments of its members), signed it in 2013. The Pact was promoted by the Ministry of Agriculture at that time, M Guillaume Garot, and engaged various actors beyond the retail sector, for instance, restaurants, farmers' cooperatives and agri-food industry, and local authorities. The national Anti-Waste Day was set for Oct 16th, and companies use this occasion to organise one-off events.

In a press release issued at the occasion, Auchan highlighted commitments undertaken at the EU level and confirmed its willingness to fight food waste. Also, the company promoted voluntary actions already put in place. They aimed at limiting food waste (reduced prices of products with limited consumption date, donations, food-waste to energy recovery), offering solutions to help consumers adapt their purchases (bulk sale, adapted packaging, “buy one, get one free later” offer), and rising employees and customers' awareness.

In the Fall of 2014, Prime Minister Manuel Valls entrusted Guillaume Garot MP with a mission to identify the difficulties generating food waste that persist throughout the food chain and to propose adjustments to the legislative and regulatory framework. A strong

⁵¹ ADEME plays a crucial role in testing novel solutions, diffusing good practices, and more general promotion of sustainability, activities and projects implemented by other actors – companies, local communities, industrial associations. For instance, regarding food waste prevention, the agency published in November 2013 detailed study proposing multiple tools and solution for actors in retail sector. It conducted from 2014 on a pilot project on food waste with a dozen of hypermarkets (report published in 2016) and later on published the guidelines how to avoid costs by reducing the waste generation instore.

⁵² In French Pact National contre le gaspillage alimentaire. Source: https://www.cnis.fr/wp-content/uploads/2017/12/DPR_2013_2e_reunion_COM_environnement_pacte_gaspillage.pdf, retrieved on Sept, 18th, 2020.

This first pact covered a period from 2013 to 2016 and was followed by the 2nd edition from 2017 to 2020. The Pact was initially signed by: sectoral association FCD and following companies Cora, Auchan, Carrefour France, Casino, E.Leclerc, Metro, Monoprix, le Groupement de Mousquetaires, Simply Market and System U.

political will to act upon the issue was clearly stated, and multiple actors gathered to establish a comprehensive vision of the problem and find a consensus.

At the end of 2014, during the work on a parliamentary report regarding food waste (coordinated by M. Garot MP), the representatives of Auchan were requested to present in detail their current practices. Anne-Cécile Bergonzi, in charge of sustainability projects, and two store managers (Guillaume Troude and Alain Reners) had testified about the practical aspects of the issue, feasibility of potential solutions and existing daily practices. Auchan mobilised various leverages in lobbying procedures and tended to exert influence individually, in addition to the sectoral representation.

On April 14th, 2015, the final report was submitted to Ségolène Royal, Minister of Ecology, and Stéphane Le Foll, Minister of Agriculture. In his report entitled "Fight against food waste: proposals for a public policy", M. Garot made several recommendations, including prohibiting large-scale distribution from throwing away food, making donations of unsold, consumable food compulsory, modifying the rules on use-by dates, promoting the "doggy bag" in restaurants, among others.

The direct consequence of the Garot report took the form of legislative attempts via amendments to the Macron bill and the Energy Transition bill. The anti-food waste measures added to the drafts tackled the retail sector exclusively and were seen by stores' managers as unjustified. Even though regarding the value chain, distribution is responsible for 14% of the total waste⁵³, the retail sector was in the spotlight as the principal responsible for food waste. Unanimously food retailers seized the matter and put in place campaigns to demonstrate their existing engagements and develop new solutions. Simultaneously retailers unanimously disclosed the general responsibility for all food losses and the fact of being pointed out as a scapegoat⁵⁴.

⁵³ Statistics shows that in the food retail sector, the average losses and wastage recorded were 197 tonnes per establishment per year in supermarkets and hypermarkets (over 400m²) (UrbanFoodLab, 2011).

Food waste in food value chain : primary production – 32%, processing – 21%, distribution – 14%, consumption – 33% (ADEME, 2016).

⁵⁴ <https://www.la-croix.com/Actualite/Economie-Entreprises/Economie/Gaspillage-alimentaire-comment-la-grande-distribution-lutte-deja-2015-08-25-1347786#>

<https://www.rtl.fr/actu/debats-societe/gaspillage-alimentaire-leclerc-accuse-royal-de-faire-sa-rentree-sur-le-dos-de-la-grande-distribution-7779519094>

https://www.lexpress.fr/actualite/societe/loi-anti-gaspillage-la-grande-distribution-se-defend_2103710.html

Moreover, in 2015 the sectoral association FCD signed a framework agreement with Coop de France, the representative agricultural and agri-food cooperatives organisation. The two lobbies have drawn up a roadmap to working together on several subjects, including food waste. This step allowed moving from a confrontational approach to a constructive one. It enabled food sector actors to present a unified front towards public authorities judged as incapable of making laws that could solve anything and pertaining unaware of retailers' and farmers' respective constraints.

In its official press release, the group Auchan indicated being “pleased” with the ban on throwing away still consumable food products. It has committed itself to support all the different initiatives that could be taken by the public authorities (reflection on expiry dates, fruit and vegetable sizing obligations, awareness campaigns, etc.). Also, the company stated that the legislation only made compulsory the practices successfully implemented by the company for over 20 years but regretted that it did not address the main causes of food waste and omitted to onboard other major players aside from retailers. However, local managers demonstrated their incomprehension regarding the legislation.

Further, since 2017, more than 230 Auchan shops have signed a partnership with TooGoodToGo – a service company connecting shops and restaurants with customers willing to buy at discount price the food left over at the end of the day. In 2018, Auchan signed the #ChangeTaDate petition launched by TooGoodToGo. According to the official communication, the objective of Auchan was to “help consumers understand expiration dates”. The willingness to act upon the consumers' awareness is the approach that led the company to form another partnership. In October 2017, Auchan officialised with the university AgroParisTech a joint initiative aimed at the co-construction of the first massive open online course in France dedicated to the topic of anti-food waste. Auchan launched the course in 2018 during the International Agricultural Show. Building on its success, the following sessions were proposed in 2019 and 2020. It is a typical example of an initiative turned toward public opinion and aimed at raising consumer awareness.

Appendix 13. Auchan's and E.Leclerc's nonmarket interactions - food donations issue

Generating food waste seems inappropriate from an environmental point of view, but also it remains unjustified when some people seek food aid. Thus, the issue of donating unsold food is also closely linked to the fight against poverty and malnutrition. In fact, since the end of the 1980s, French companies have been encouraged through fiscal policy measures to donate unsold products⁵⁵. At that time, food donations were realised through local partnerships managed by respective stores individually.

Since the 1990s, Auchan has been a pioneering company in food donations fostered by existing fiscal leverage. In 1995, Auchan established a national partnership with Banques Alimentaires for food and non-food product donations. The yearly collection of food items and essential products was organized at the store entrance. It was renewed 20 years later. In 2012, 56 hypermarkets donated food regularly. Also, in December 2011, the association Les Restaurants du Coeur appealed for more contributions in terms of food aid, as the supplies they received would not allow conducting their campaign throughout the winter. Auchan replied positively and mobilised its staff to provide more donations.

The donation practice also emerged within E.Leclerc movement, as some stores have provided food aid to local organizations. For instance, the hypermarket in Coulanges-lès-Nevers started its partnership with Epicerie Solidaire in 2005. Aside from the individual actions conducted by store managers and local associations, in 2011, regional purchasing centres of E.Leclerc donated over 33 tons of food to the association Banques Alimentaires and 42 tons the year after.

At the beginning of 2015, a public online petition was launched by a local politician claiming a law making it compulsory for supermarkets to donate all their unsold goods daily to associations for further distribution. Arash Derambarsh, who created the petition with a well-known French actor Mathieu Kassovitz, asked for integrating the issue in one of the forthcoming laws, as the report by Guillaume Garot MP would not be debated until Fall 2015

⁵⁵ The 1989 finance law, passed on 23 December 1988, also known as the Coluche bill or amendment (official name is Article 238 bis of the General Tax Code) creates an additional tax deduction for companies donating to certain charitable and humanitarian associations known as "organisations for helping people in difficulty".

and then possibly voted in 2016. Till mid-April, the petition has been signed by almost 180 000 people. An amendment was introduced in the Macron bill making it compulsory for retail shops with a surface area of more than 1,000 m² to set up an agreement to organise the secure collection by food aid associations of unsold foodstuffs that are still consumable. The National Assembly afterwards deleted the amendment voted by the Senate in April in the new reading.

The Garot report's main measures regarding the food retailers were added to the draft of the Energy Transition bill, which was examined on second reading by the National Assembly in May and then by the Senate in June 2015. Both chambers voted for amendments, making it compulsory for supermarkets to donate their unsold food to charities. When the anti-food waste measures consisting of food donations were voted numerous store directors expressed their perplexity. Afterwards, the Constitutional Council censured specific provisions on food waste contained in the Energy Transition bill due to procedural errors⁵⁶.

In August 2015, after several regulatory unfruitful attempts to introduce compulsory donation by retailers of unsold food, Ségolène Royal, Minister for Ecology at the time, called retailers to restore some of the provisions censured by the Constitutional Council through a voluntary engagement. In this regard, she convened the representatives of the relevant companies to a special meeting. It was the beginning of a period lasting for ten days or so when the tensions around the idea of sectoral engagement were present in the media. Some suggested that targeting the retailers, who were the best allies in fighting against food waste, might ruin the political credibility of the minister.

However, the day following the promulgation of the Energy Transition bill, on Aug 18, 2015, a group of senators presented a new bill on this subject while expressing their legitimate doubts about the success of the voluntary approach. The agreement would ease tensions but, for some MPs, would not solve the problem. The action undertaken by the government to push for voluntary commitment was called a “smokescreen”. According to them, only the law

⁵⁶ Décision n° 2015-718 DC du 13 août 2015 Loi relative à la transition énergétique pour la croissance verte, <https://www.conseil-constitutionnel.fr/decision/2015/2015718DC.htm>, retrieved on Sept, 18th, 2020.

could force retailers to change their practice, as the engagement announced by the executives may not be respected by the operational managers, especially in franchise stores⁵⁷.

In its immediate response, Auchan reminded that the company has already implemented most of the commitments expected by the government and claimed that 100% of hypermarkets practised daily donations to various associations. Auchan announced that it would sign the voluntary agreement. The firm stated to be fully in favour of this pragmatic approach, which made it possible to leverage actions already undertaken, share good practices, and structure the process on a sectoral level.

On the contrary, in response to the minister calling the retailers to sign a voluntary agreement, M. M.-E. Leclerc deplored her methods. The statement by Minister Royal accusing supermarkets of destroying their unsold stocks by bleaching them, thus making them principally responsible for food waste, was immediately described by M.-E. Leclerc as a PR stunt. After citing many local initiatives undertaken by different stores (“*anti-gaspi*” shelves, fruit & vegetable baskets, onsite food transformation), M.-E. Leclerc was outraged that Ségolène Royal would reap the benefits of retailers’ work. Indeed, in 2015, 95% of E.Leclerc chain stores formalised a food donation agreement with at least one association, and 50% have three or more partners. M.-E. Leclerc recalled the need to give adequate means to associations (i.e. more money so that associations can have more volunteers and essential infrastructure to store the products better). In the same interview, he suggested that the minister should commit to giving more means to local authorities to set up sorting in schools, introduce the issue to school programs, and raise public awareness. He also considered the backfire of a highly efficient internal anti-food waste policy, where retailers would improve their daily operations to the extent that food donations to charity associations were no longer possible (the risk confirmed in 2019 in the evaluation of Garot Law⁵⁸).

At the end of August, during the meeting when the retailers signed the voluntary engagement, the issue of use-by dates have been risen by representatives of E.Leclerc, as they expected the government to mobilise the European Commission and its counterparts in order

⁵⁷ <https://www.ladepeche.fr/article/2015/08/27/2166000-gaspillage-royal-fait-rentree-dos-grande-distribution-proteste-leclerc.html>, retrieved on Sept, 18th, 2021.

https://www.lepoint.fr/societe/les-supermarches-sommes-de-lutter-contre-le-gaspillage-alimentaire-27-08-2015-1959691_23.php, retrieved on Sept, 18th, 2021.

⁵⁸ <https://agriculture.gouv.fr/gaspillage-alimentaire-evaluation-de-lapplication-des-dispositions-prevues-par-la-loi-garot>, retrieved on Sept, 10th 2020

to change the regulations on the use-by date or the rules for size sorting for fruits and vegetables.

Overall, the participants of this meeting seemed satisfied with the results that allowed calming the controversy raging for the past several days around the issue of food waste. The Government had obtained a commitment from retailers to take over the censured provisions in the framework of a voluntary agreement, including the ban on the destruction of unsold food that can be consumed, an impossibility for manufacturers to prohibit the donation of private label products, and generalisation of donation agreements to an authorised food aid charity (for all stores of more than 400 m²). However, for companies which the Minister of Ecology pointed out, all these actions were not innovative. The sectoral association FCD was glad that the voluntary commitment allowed retailers to avoid imposing the solutions through the law. On the other hand, the government had also committed to certain measures (promotion of retailers' initiatives, provision of the regularly updated list of charities eligible for donations). In parallel, the food aid associations emphasized the importance of the State's engagement to maintain subsidies and support for donations in the long term.

However, the legislative efforts continued in the Fall of 2015. During the hearings by the senatorial committee on the specific anti-food-waste bill, different stakeholders expressed their positions, including nine NGOs, three retailers, and two sectoral federations⁵⁹. It can be noted that the representatives of associations were twice as many as those of economic actors. It allows thinking that they benefited from the privileged access to decision-makers. Regarding food donations, the report presented at National Assembly in November 2015 specified that economic actors in the retail sector had spontaneously set up food donation agreements with charities and continued discussions to establish a universal reference agreement. Thus, the objective of the legislation was to “recognize and legitimize their intervention”⁶⁰.

⁵⁹ N°3223 Assemblée Nationale, Enregistré à la Présidence de l'Assemblée nationale le 17 novembre 2015. Rapport fait au nom de la commission des affaires économiques sur la proposition de loi visant à lutter contre le gaspillage alimentaire (n° 3052) par M. Guillaume Garot Député, https://www.assemblee-nationale.fr/14/rapports/r3223.asp#P506_97616

⁶⁰ “(...) many large retailers have spontaneously set up food donation agreements with charities; it is therefore a question of establishing a normative standard that recognises and legitimises their intervention, and that obliges recalcitrant retailers. A standard agreement is currently being prepared in the context of discussions between the major charities and the main distributors: the aim is to complete the legislative impetus by communicating a reference agreement, which can generalise virtuous behaviour in compliance with the law.”

When Garot Law was proceeded at the end of 2015, the representatives of the Auchan group - Marketing Director, Public Affairs Director and Sustainability Manager - participated in parliamentary hearings. It was another opportunity to emphasise Auchan's long-standing commitment to food donations. However, framing donations as food waste was considered a corporate communication trap. On different occasions, Auchan underlined that its main objective was to sell products of good quality at affordable prices. Wasting food or throwing away other products generates losses and nonsense for retailers. And from an economic point of view, donations as a solution for food waste recovery only limit losses. Also, two representatives of E.Leclerc group were auditioned. Together with national Sustainability and Quality Manager, Tomas Pocher - the most engaged on environmental issues storeowner, known as "Mr Anti-Waste" - has presented concrete solutions. Surprisingly, the Garot report, issued a few months earlier, provided examples of initiatives undertaken by Thomas Pocher, without previously talking to the person concerned.

The introduction of new regulations was pushed forward by some service companies that developed their business models based on food-waste donations and recovery (for instance, Comerso, Phenix, TooGoodToGo)⁶¹. The collaboration with companies specialised in anti-food waste changed the daily onsite practices. For instance, each retailer has its policy regarding short-dated products removal from the shelf. It is called the "freshness charter". This practice is put in place to guarantee consumers that after buying a specific product, it's not required to consume it immediately but can be kept for a few days. Typically, the removed products were redirected to the donations. Introducing the new solution - dynamic shelf policy - consisting of selling fresh consumable products in a short time deprives associations of some potential resources.

The new legislation enjoyed widespread support across partisan lines, a rare occurrence in France. In December 2015, the French National Assembly voted unanimously on the specific anti-food-waste bill to prevent retailers from spoiling and throwing away unsold food. The bill of 11 February 2016, known as the Loi Garot, bans supermarkets from destroying

n° 3223 Assemblée Nationale - enregistré à la présidence de l'assemblée nationale le 17 novembre 2015. Rapport fait au nom de la commission des affaires économiques sur la proposition de loi visant à lutter contre le gaspillage alimentaire (n° 3052) par M. Guillaume Garot.

<https://www.assemblee-nationale.fr/14/rapports/r3223.asp>, retrieved on Nov, 18th, 2021.

⁶¹ Since 2017, more than 230 Auchan shops have signed up the partnership with TooGoodToGo – service company connecting shops and restaurants with customers willing to buy at discount price the food left over at the end of the day.

leftover products by obliging food stores of more than 400m² to sign agreements (food donation contracts) with associations to donate foodstuffs. Indeed, stores are not forbidden to throw away, but only to consciously prevent the waste of unsold goods.

Once the bill was passed, M.-E. Leclerc indicated on his blog that it brought nothing new regarding food waste policy. Unsurprisingly, it is an opinion shared by other representatives of E.Leclerc group. Seemingly, Auchan insisted that donations were a well-established practice even before the law was implemented. Through a specific communication strategy launched in local media (articles providing examples of stores and their statistics of donations in recent years), Auchan demonstrated that making donations compulsory did not significantly change their practice. Also, the company reminded that the aim was not to donate but to manage stocks better.

It may be observed that the way of thinking about food donations differs between actors. For a long time, donations were seen more in terms of charity than anti-waste policy. At the beginning of 2017, a journalist contacted different retailers in the department of Loiret to get information about their food donations. A local E.Leclerc refused to communicate on the issue using an argument of not communicating “on humanitarian or charitable actions”. The store's reply can be considered surprising, knowing that all competitors except one were fully transparent regarding their food donation practices. Nevertheless, it shows that in 2017, over a year after the Garot Law entered into force, the food donations were still considered by this manager as confidential charity policy rather than anti-food waste action worthy of being publicized. Also, advertising donations as a solution to food waste attracts attention to the issue, which was considered harmful for the whole group.

The effects of Garot Law have been immediately perceived. According to the leading national association for food aid, a significant increase in recovered volumes of food has occurred since 2016⁶². The new regulation has pushed 12% of the laggards to put daily

⁶² The volumes recovered from large and medium-sized retailers have increased by 11.2% in 2017 and 4.7% in 2018 to reach 48,000 tons in 2018. The number of donor stores has also increased by 16% in two years and reached 2 717 stores (for all retailers; in 2016 - 2350 stores participated in daily donations, in 2014 – 1879 stores).

Source : Rapport d'activité du réseau des Banques alimentaires 2018 - https://www.banquealimentaire.org/sites/default/files/2019-07/Rapport%20annuel%202018%20PP_BD.pdf, retrieved on Sept, 18th, 2020.

Data according to annual reports of Banques Alimentaires 2014 and 2016.

<https://www.banquealimentaire.org/sites/default/files/2019-05/Rapport%20annuel%202014%20BD-min.pdf>

donations in place and 23% of stores already giving unsold food to strengthen their policy⁶³. 5,000 new local associations have been set up in less than two years to collect and distribute unsold food⁶⁴.

Moreover, it was also observed by the managers in central structures of E.Leclerc, that all stores had not systematically practised donations. Indeed, the policy of the whole E.Leclerc chain was not fully harmonised. They recognized that the organization mode (group of independent retailers) does not ease the internal control over store managers and implementation of good practices. Deplorably, in February 2019, the E.Leclerc supermarket in Mimizan was caught red-handed throwing away consumable food. The action was carried out and publicised by Arash Derambarsh, who also initiated complaint proceedings against the store. It required E.Leclerc group to conduct a crisis communication campaign and to acknowledge the misfunctions.

Once the legislation came into force, the sanction for non-respect of its prescriptions was a fine of 3750 euros. The report on the evaluation of the Garot Law was submitted in June 2019. As one of its consequences, the penalty was raised to 10 000 euros, arguing that retailers had been granted the adaptation period long enough. It can be recognized that the enforcement of the law (including controls and sanctions) remains not sufficiently dissuasive for some economic actors.

<https://www.banquealimentaire.org/sites/default/files/2019-05/Rapport%20annuel%202016%20Banques%20Alimentaires%20BD.pdf>

⁶³ A survey (of 164 hypers and supermarkets) carried out in December 2017 showed that before the enforcement of the anti-food waste law, 87% of stores had already implemented anti-waste practices (for example, 100 percent of Auchan hypermarkets and 95 percent of Leclerc shops donated to associations). Source: Comerso, 2018.

⁶⁴ https://www.lepoint.fr/high-tech-internet/gaspillage-alimentaire-une-appli-pour-relier-supermarches-et-associations-16-10-2017-2164844_47.php, retrieved on Nov, 18th, 2021.

Appendix 14. Auchan's and E.Leclerc's nonmarket interactions - plastic policy

For a long time, the plastic policy focused on eliminating plastic bags. As early as 1995, E.Leclerc group launched a pilot project on the withdrawal of single-use plastic bags in 42 stores. In 1996 the project was expanded to the national level. Alternatives were created, and an exchange of old sacs for new ones was offered. In 2006 the company sold 48 million reusable bags, and in 2014, the volume almost tripled (177 million).

In 2003, an important awareness campaign, “No more plastic bags”⁶⁵, was launched by Serge Orru (Orru, 2005), director of association World Wildlife Fund, in partnership with food retailers⁶⁶. This campaign also responded to a strong incentive from the Ministry of Ecology and Sustainable Development⁶⁷. It has rapidly transformed from a local initiative to a national engagement of multiple retailers. A significant decrease in bag usage was reported (the number of bags dropped from 17 billion in 2003 to 700 million in 2013)⁶⁸.

Simultaneously, in November 2003, FCD launched the "Checkout bags" operation. Further, in 2009 the FCD signed an agreement on biodegradable waste bags for waste collection with the Ministry of Ecology. This campaign was evaluated as successful as the number of plastic bags available in stores free of charge has dropped drastically⁶⁹. It allowed retailers to position themselves on the issue in the following years. The standard solution was to propose the sale of reusable shopping bags.

Auchan's approach to plastic was based on two commitments: to reduce the sources of plastic pollution on which the company has the capacity to act and to raise awareness and mobilise its stakeholders, including suppliers, employees, and customers. The efforts focused on single-use plastic products and all types of plastic packaging (household, transport and logistics, distribution, checkout). The ‘Green checkout’ project was already largely

⁶⁵ In French: *Halte aux sacs plastique*.

⁶⁶ In May 2003, the four brands present on the Corsica island (Géant, Casino, Système U, Champion and Carrefour) organised a consultation with their customers in all their shops, with the help of the Corsican Environment Office, so that they could be involved in the choice of a replacement solution for plastic bags.

⁶⁷ Questioning by the Minister, Roselyne Bachelot-Narquin, at the La Baule conference in September 2003.

⁶⁸ https://www.corsenetinfos.corsica/Halte-aux-sacs-plastique-Une-campagne-initiee-il-y-a-10-ans-par-le-Festival-du-vent_a5799.html, retrieved on Dec, 18th, 2019.

⁶⁹ In 2002, 10.5 billion free carrier bags compared to 0.71 billion in 2012. Source: Ecoemballages sagements.

implemented in 2008. This initiative emerged thanks to the internal environmental contest organized in 2004. It originated in Martingues town, where specific checkouts promoting reusable bags while not providing plastic ones for free were created. The following year all hypermarkets followed the training to implement such a project, and more than half (56 of 120) adopted it. Immediately (according to the statistics from 2005), the number of single-use plastic bags distributed free of charge dropped by 51%. The principle was rapidly expanded to all of the company's shops, and since 2008, free single-use plastic bags have not been provided at checkouts anymore.

Several governmental initiatives have aimed to tax or eliminate plastic bags by proscribing free-of-charge bags offered to consumers. The Agricultural Orientation Law from 2006 aimed to ban the distribution of all single-use non-biodegradable plastic carrier bags (free of charge or for a fee) from 1 January 2010. Nevertheless, at the end of 2009, the decree that shall determine the conditions of this ban was not published, and the prescription was not implemented. In the 2009 Finance Act, an amendment intended to tax cash register bags and disposable fruit and vegetable bags made from petroleum. Although it was finally rejected, this amendment was mainly aimed at promoting bags made from bioplastics⁷⁰. Further, the National Assembly has adopted in the first reading of the 2011 draft budget a special tax on plastic bags distributed free of charge at checkout counters. Again, the Senate has rejected the tax project. Indeed, the government was against this fiscal solution and a large lobby coalition, including retailers and the French plastic industry, claimed its abandonment. The senators toned down their refusal by postponing the introduction of this tax to 2014⁷¹.

The industrial partnership between Auchan and TTPlast company (launched in 2008), aimed at providing bags from recycled plastic pallet-wrapping covers, brought its first results in 2013 when clients could purchase the recycled bags in stores. Such an initiative, replying to sustainability and circular economy challenges, was applauded by local and national politicians. It was also advertised as a competitive differentiating factor⁷². In 2016, nearly thirty Auchan Retail France shops and warehouses supplied 80% of the plastic needed for

⁷⁰ Cniid, *Le point sur... les sacs de caisse. De la diminution à la taxation en passant par l'interdiction*, Dec 21st 2009, <https://cniid.fr/Le-point-sur-Les-sacs-de-caisse,180>, retrieved on Dec, 18th, 2019.

⁷¹ The amended finance law (Article 47) introduced in principle on 1 January 2014 a tax of approximately €0.06 per bag on all single-use plastic carrier bags.

⁷² "Leclerc wanted to delete them. Auchan prefers to recycle them", Source: LSA, Oct, 2012, *Des sacs 100% recyclés pour Auchan*

producing recycled and reusable checkout bags made in France⁷³. Thus, when the legislation banning free single-use plastic bags was implemented, the company was not concerned about it.

Consecutive laws enacted in 2015 and 2016 banned: oxo-fragmentable bags (from 2015 on), single-use plastic bags at checkouts (from mid-2016 on) and outside the checkout (such as fruit and vegetable bags) unless they are compostable at home and bio-based (from the beginning of 2017). The restrictions on plastic bags were introduced gradually by consecutive decrees (according to bags' technical characteristics), partially due to a major lobbying campaign carried out by representatives of the plastic industry. For instance, Martin Tarrach, Managing Director of TTPlast was very active in the political arena in 2015 regarding the issue of plastic bags⁷⁴.

When consecutive laws introduced the ban on single-use plastic bags, E.Leclerc essentially presented itself as a 'pioneer' company for withdrawing single-use plastic bags. This ground-breaking attitude was also recognized by its competitors and journalists. In 2016, a media campaign (in journals and on billboards) directly tackled the Ministry of Ecology to remind her that it's been over twenty years that E.Leclerc engaged on the issue. In the past, in 2003, the same communication strategy tackling Roselyne Bachelot was implemented⁷⁵.

Figure 43. E.Leclerc advertisement regarding the ban on single-use plastic bags



Source: <https://www.nouvelobs.com/politique/20160702.OBS3826/egerie-d-une-pub-leclerc-segolene-royal-s-amuse-puis-s-agace.html>

⁷³ In 2017, the total of 5 000 tonnes of flexible plastics were recycled. The goal announced at that time was to double the volume in 2025. Source: Sustainability reports of Auchan.

⁷⁴ <https://www.lavoixdunord.fr/art/region/lens-un-pas--plus-vers-l-interdiction-s-sacs-ia35b54051n3026071>, retrieved on Dec, 18th, 2019.

⁷⁵ <https://www.usinenouvelle.com/article/leclerc-met-la-ministre-de-l-ecologie-dans-son-sac.N1751432>, retrieved on Dec, 18th, 2019.

Still, in 2017, E.Leclerc continued to carry social awareness campaigns on plastic bags. Plainly, 20 years of individual self-regulation, along with social movements and sectoral initiatives, were not enough to eliminate plastic single-use bags from the market.

Finally, the Energy Transition bill introduced the ban on single-use plastic bags while granting the right to sell the so-called multi-use plastic bags with different technical characteristics. To adapt to the new legislation, Auchan continued its partnership with TTPlast by creating a new offer of plastic checkout bags – thicker than the previous models and advertised as reusable and compatible with standard 20-litre household waste bins. Auchan used the opportunity to promote its virtues in line with the logic of circular economy, contributing to ecology and employment. Fundamentally opposed to the total prohibition of plastic bags, the retailer emphasised that recycled plastic bags benefit from a more favourable environmental footprint than paper bags. However, the company renounced participating in political debate in the future.

Auchan defended the collaborative approach of retailer-producers⁷⁶ to promote the use of recycled plastic. In 2011, it partnered with a producer of mineral water Roxane (bottled water sold under the brand Cristaline)⁷⁷. It consisted of introducing the system of onsite plastic bottles disposal for customers. Special events were organized, in the presence of the representatives of the company and local politicians, to inaugurate kiosks collecting empty plastic bottles to give more visibility to the initiative⁷⁸.

Further, the problem of “all-plastic” has become a political issue to a large extent as a result of actions conducted by activists against plastic pollution in the oceans and seas. In 2013, the project “ Expedition 7e continent” was initiated in France⁷⁹. A year later, major

⁷⁶ in French system a principal responsibility for product recycling is put on the seller and not necessarily on manufacturer.

⁷⁷ The first scheme of plastic bottles deposit for local recycling was tested in 2011 in Aubière. In 2015 a national initiative was launched after carrying out multiple pilot projects in different locations. At that time the so-called *ÉcoBoxe* was installed in 15 hypermarkets, and in 2019 the number of stores collecting bottles was multiplied by five. In 2020, in total, over 100 million bottles have been processed since 2015.

⁷⁸ For instance, hypermarkets of Manosque and Montivilliers, both inaugurated in 2018.

La Provence, Sept 15th, 2018, Une deuxième vie pour nos bouteilles en plastique; L'hypermarché Auchan de Manosque s'est doté d'une machine de collecte.

Le Progrès de Fécamp, March 2019, Montivilliers : inauguration de l'Ecobox installée au centre commercial de la Lézarde

⁷⁹ <https://www.septiemecontinent.com/les-expeditions/>

scientific research on plastic pollution in the World's oceans was published⁸⁰. In 2014, the European Environmental Agency published multiple reports and articles on waste, especially plastic pollution⁸¹. At the EU level, A European Strategy for Plastics in a Circular Economy was issued at the beginning of 2018. The following year, the Directive on reducing the impact of certain plastic products on the environment was published⁸².

This political will to act upon plastic pollution in a broader context of the circular economy has also been noticed in France. According to the EGAlim Bill (2018), several single-use items cannot be offered for sale from the beginning of 2020, for instance, disposable tableware and plastic cotton buds. The Circular Economy Law voted in 2020 extended the prohibition (from 2021) on single-use plastic items to other products: straws, cutlery, fidget spinners, cups and lids, fast food boxes, balloon sticks, confetti, etc.

Unquestionably, the issue of plastic is connected mainly to policies on the circular economy. The National Packaging Council⁸³ bears witness to this evolution. Historically involved in developing a packaging waste prevention policy, it works on developing a responsible eco-design policy for all product packaging. Its president, M. Michel Fontaine, warns that companies and consumers tend to focus only on the end-of-life of plastic packaging. In contrast, looking at the product/packaging combination over its entire life cycle is more important⁸⁴. The eco-design remains a paramount solution regarding its potential to reduce the amount of waste⁸⁵. Thus, plastic products and packaging turn out to be a dominant subject of societal and political discussion on waste and related pollution.

⁸⁰ Eriksen M, Lebreton LCM, Carson HS, Thiel M, Moore CJ, Borerro JC, et al. (2014) Plastic Pollution in the World's Oceans: More than 5 Trillion Plastic Pieces Weighing over 250,000 Tons Afloat at Sea. PLoS ONE 9(12): e111913. <https://doi.org/10.1371/journal.pone.0111913>

⁸¹ <https://www.eea.europa.eu/fr/signaux/signaux-2014>

<https://www.eea.europa.eu/fr/signaux/signaux-2014/gros-plan/des-ordures-dans-nos-oceans>

⁸² <https://eur-lex.europa.eu/eli/dir/2019/904/oj>

⁸³ *Conseil national de l'emballage* - <https://conseil-emballage.org/>

An association created in 1997 as a moral authority bringing together the different institutional and economic actors in the packaging value chain

⁸⁴ Interview of M. M. Michel Fontaine: "Plastic is a perfect example. For many people, it is no longer a material, it is a waste product that pollutes the oceans and must be disposed of. Any material, even if its environmental impact is three or four times greater, will be preferred to a plastic bag."

Source : LSA Green, *Le casse-tête de l'écoconception des emballages*, published on March, 25th, 2020

<https://www.lsa-conso.fr/le-casse-tete-de-l-ecoconception-des-emballages,343440>, retrieved on Dec, 18th, 2021.

⁸⁵ For instance, packaging represents nearly 40% of the plastic used in Europe every year, according to PlasticsEurope, the European association of plastics producers.

In 2018 first edition of “The No Plastic Challenge” was launched by No Plastic In My Sea, an organisation that fights against plastic pollution and its consequences on the marine ecosystem. These actions aimed at onboarding consumers and demonstrating how changing daily routines may help preserve the planet have become very popular and organized locally by various organizations and institutions. 2019 was marked by multiple social campaigns launched by well-known NGOs. For instance, Conservation International published a campaign that directly tackled the retailers on “stupid packs” to denounce the over-usage of plastic packaging for fruits and vegetables⁸⁶. In contrast, WWF published a series of reports and guidelines for policy decision-makers⁸⁷. However, National Packaging Council noted that the scientists who base their analysis on facts and figures have become inaudible by a large part of society, including political decision-makers, and that the public debate on plastic had become far from rational and emotional arguments took over.

More recently, government and civil society organisations have undertaken an initiative to co-create a National Pact on Plastic Packaging. This commitment is at the heart of the strategy detailed in the Circular Economy Roadmap and the European Plastics Strategy. It is also based on the vision of the Ellen MacArthur Foundation's Global Commitment to the New Plastics Economy. The Pact was signed in February 2019 during a meeting at the Ministry of Ecological Transition and Solidarity under Brune Poirson, Secretary of State. It brings together all the voluntary players in the plastics value chain: producers, converters, national brands, distributors, and waste management operators.

Auchan engaged as a founding member of the French Plastic Pact⁸⁸. Periodic reports are published to follow the companies’ progress in achieving the abovementioned goals. Also, the pact’s website provides information on a large number of projects as a response to the undertaken commitments. A few months earlier, following the publication of the Circular Economy Roadmap (June 2018), Auchan Retail France presented its objectives aligned with an ambition to recycle 100% of the plastics produced by its business by 2025. For instance, in

<https://plasticseurope.org/wp-content/uploads/2021/10/2018-Plastics-the-facts.pdf>

⁸⁶ https://www.adsoftheworld.com/media/design/conservation_international_stupid_packs

⁸⁷ <https://www.wwf.fr/sengager-ensemble/relayer-campagnes/pollution-plastique>, retrieved on Dec, 18th, 2021.

⁸⁸ Following food retailers have signed the Plastic Pact: Groupe Carrefour, 3 retailers of Groupe Casino (Casino, Monoprix, Franprix), and System U. The signatory companies undertake to: eliminate problematic or unnecessary plastic packaging by 2025, develop business models for reuse, re-use and bulk sales, eco-design packaging to make it reusable and 100% recyclable, collectively achieve 60% of plastic packaging effectively recycled by 2022, incorporate an average of 30% recycled plastics in packaging and work on other innovative solutions, among other things.

its annual report - edition 2020, Auchan communicated on eliminating single-use plastic tableware from sale from 2019. Indeed, regarding regulations in force, the company did it somewhat in advance; however, it seems as if the omission to cite the legal obligation in that matter (voted in 2015 and in force gradually for different categories of products from 2020 on) was deliberate.

After the publication of Circular Economy Roadmap, E.Leclerc announced its plan to reduce the use of plastic, especially the non-recyclable one, while considering the retailer's purchasing policy and sales forecasts. This commitment can be presented as an early-compliance policy when the company implements expected regulations regarding the legal timeframe of withdrawal of single-use plastic items from the market. Indeed, every self-regulation initiative is subject to global reflection on its impact on the entire value chain. E.Leclerc recognizes that the optimization process can be introduced relatively easily and within existing regulations, contrarily to attempts at radical change (replacement of the material by a new one). The latter requires time for the upstream (i.e. production equipment) and downstream adaptation but may necessitate engaging in a political bargain on a new legal framework.

When the draft Circular Economy Law was debated in parliament, the group decided to promote the deposit system for plastic bottles. It was very similar to an initiative put in place by a competitor a few years earlier. In 2019, in partnership with start-up Cycleen, E.Leclerc installed plastic bottle collectors in stores. The pilot project of 37 machines in the Occitaine region has rapidly expanded. In July 2019, during the inauguration of a machine at the Rouffiac-Tolosan shopping centre, Mr M.-E. Leclerc advocated for the deposit of plastic and glass as a systemic solution. He called the government to follow Germany's example, where this solution is largely developed. The partners claimed that recycling should no longer be part of the world of waste but should become a service offering a different, incentive-based experience.

Appendix 15. Auchan's nonmarket interactions - packaging issue

Since 1995, all producers of packaging waste have been subject to the legal obligation to sort and recover their packaging waste⁸⁹. Retailers participate in building waste recovery channels and have to contribute financially to the structuration of the waste disposal sector⁹⁰.

The packaging is tightly linked to issues like food quality and conservation conditions, provision of valuable information to the customer or circular economy. Many voluntary engagements are related to the optimisation opportunities existing concomitantly for logistics or financial profit. Also, industrial and commercial packaging can be highly valued as recycled material, which modifies the balance of the benefit-cost ratio of specific anti-waste solutions.

For a long time, regarding products sold under its brand (private labels), Auchan had committed to improving their recyclability through eco-design⁹¹, integrating materials from recycling and eliminating unnecessary packaging⁹². In 2004, the company boasted of reducing the packaging of mashed potatoes while demonstrating its advantages for logistics in terms of transported volume and diminished weight⁹³. In 2010, Auchan, a member of Club Déméter – think and do tank on sustainable logistics - actively participated in a packaging group. In the

⁸⁹ Following the Extended Producer Responsibility as the principle for waste prevention brought to national legislation from the EU, unless they produce less than 1,100 l/week and they are collected by the Public Service (decree n°94609 of 13 July 1994).

⁹⁰ The eco-participation is the annual financial compensation paid by a company (producer, distributor, or importer) to a certified eco-organism for the management of the disposal of waste generated by its activities.

⁹¹ Eco-design is defined by the European Environmental Agency as “the integration of environmental aspects into the product development process, by balancing ecological and economic requirements”. Eco-designed packaging is viewed as process/product innovation for greater ecoefficiency through incorporating environmental and/or social concerns into packaging life cycle. These concerns may vary from adaptation to consumers' specific needs, through resources conservation, to public health issue.

Source: <https://www.eea.europa.eu/help/glossary/eea-glossary/eco-design>

⁹² Since 2012, Auchan Retail France has been working on the gradual elimination of the flow pack for organic fruit and vegetables sold individually or in batches (over 14 references). The alternatives proposed are labels, stickers, or ribbons. In 2021, this represented almost 20% of the offer (compared to 3% in 2015). In overall, it regards different types of products, for instance: elimination of plastic windows on "vehicle" toys (46 references) results with unitary reduction plastic of 21.7 g; replacement of the plastic inner tray blister pack of hair dryer with a cardboard pulp tray results with unit reduction of plastic of 70 g.

https://pacte-national-emballages-plastiques.fr/progres-et-realisation/?_sfm_annee=2019&_sfm_organisation=544, retrieved on Jan 15th, 2022.

⁹³ 2 cm reduction in case height for the same volume of product contained: cardboard weight reduction of 11.7%, 16% of additional volume transported in one truck.

Source: Auchan, 2004, presentation of Sustainability Director.

mid-2010s, a new trend in the retail sector emerged: specialized bulk stores, often operating in downtowns and dedicated to wealthier customers concerned with environmental issues. However, since 2004, Auchan has already introduced bulk sales into its offer. Later, it claimed recognition of the company's policy for 'democratising' bulk sales while mobilising arguments for fighting food waste and overpackaging. Indeed, in 2004, a new concept of a zone dedicated to bulk sales was introduced and implemented in all hypermarkets. Called "Self-discount", its primary motivation was to allow clients to buy cheaper the exact volume of product they needed. Only afterwards, the ecological aspect of bulk sales was enhanced.

Overpackaging and unpacking platforms

Also, in 2010, a social movement for imposing limits on manufacturers in terms of packaging (against overpackaging) mushroomed. It started with several groups on social media referring to the international petition website *over-packaging.eu*. The website was launched by Frédéric Crépin, a French army soldier who presented this initiative as civic and apolitical, without links to any NGOs. Its main objective was to submit a draft law in Brussels. Thus, the petition was translated into a dozen European languages. His action resulted from disappointment regarding Grenelle law, which did not include any specific provision against overpackaging. Also, it was impossible to verify if retailers respected their commitment from 2008 when they announced a voluntary engagement to reduce the weight of their packaging by 1kg per inhabitant over five years. Whereas environmental associations aligned with the civic initiative, a representative of France Nature Environnement expressed his conviction that the issue raised in the petition should be passed on to an organized pressure group. He positioned associations as more legitimate (than ad-hoc civic initiatives) to enter the political arena and lobby for legal changes requiring more sustainable behaviour from retailers.

In 2011, as a reply to an online petition launched for European law against overpackaging, Auchan indicated that it had already reduced its packaging by 1,000 tonnes per year⁹⁴. Also, the company insisted on the negative impact a new lighter package could have on sales by giving an example of toothpaste tubes sold without cardboard packaging. Indeed, in March 2010, the retailer eliminated cardboard boxes for toothpaste and chocolate mousse sold under its own brand, but it resulted in a significant drop in sales for the former.

⁹⁴ For the total of 8900 tonnes from 2004 to 2010. The numbers communicated in 2013 indicate 12 200 tonnes of packaging removed from own brand products since 2005. Source: Auchan, 2013, Sustainability report.

Thus, the packaging is essentially used as merchandising tool and sustainability issues are disadvantaged compared to the pressure on sales.

Following the international benchmark, the first “unpacking platform” was installed in France in 2008. The National Centre for Independent Information on Waste (in French *Centre national d'information indépendante sur les déchets* - Cniid) published guidelines for shops wishing to set up this solution⁹⁵. The idea of compulsory creation of unpacking platforms had been removed from the Grenelle conference conclusions but reintroduced subsequently in the draft law. The Senate had adopted an amendment to the bill in this sense, and the Assembly validated the mandatory implementation of platforms dedicated to collecting overpackaging in supermarkets. The FCD's lobbying managed to change the threshold of shops concerned from 500 to 2,500 m² of sales area. The compulsory collection of over-packaging at the checkout was introduced by the *Grenelle 2* Law of July 2010⁹⁶. At the beginning of 2010s, Auchan tested the return of packaging in 11 of its shops for over a year. The results were disappointing, and the company abandoned the creation of dedicated zones, despite the legal obligation. Indeed, some operational managers claimed that transferring the sorting channel that worked rather well (selective household sorting) to stores that are not equipped and adapted to the treatment of additional materials pictures the persisting regulatory misalignment regarding the economic reality. Retailers are constrained to sort different types of materials and have created much more recycling channels than required. Most retailers did not implement the regulation for practical reasons. However, no sanctions have been taken by the public authorities.

Afterwards, the food retailers were accused by some NGOs of deliberate inertia and intentional non-compliance. Meanwhile, the Ministry of Ecology considered a reminder of the law towards the companies while regretting the ambiguous law (lack of precision regarding the bodies in charge of enforcing this obligation and the sanctions incurred in case of no respect). The FCD claimed that the partial results from the pilot project (conducted in partnership with food retailers, ADEME and the Ministry of Ecology) had indicated the low quality of packaging recovered (mixed with other waste), which made it unsuitable for further recycling. The assumption that the new system would improve recycling was considered

⁹⁵ *Cniid*, which has been supporting one-off unpacking operations in supermarkets since 1993, recognized in its report from 2009 that the main advantage of unpacking platforms is that they raise public awareness, even though they remain inadequate with the existing waste recovery system.

⁹⁶ Precisely: "no later than 1 July 2011, all retail establishments of more than 2,500 square metres (...) must have at the checkout a take-back point for packaging waste from products purchased in this establishment".

wrong, and the main legislative objective (transfer of overpackaging waste flow and associated costs from households to retailers) was not reached⁹⁷. A decade later, the Circular Economy Law (in French *Loi AEGEC*) proceeded the issue of compulsory unpacking platforms again. Auchan's position, together with its competitors, was to resign itself to the repetition of a provision in another legislative act. The company did not wish to lobby against this regulation, knowing that it would remain a "dead letter" once the law entered into force.

Use of recycled packaging

Recycled packaging is considered a viable solution to limit waste production, even though using recycled packaging has raised another issue. In October 2015, Foodwatch warned the public regarding the chemical contamination of many food products due to their recycled cardboard packaging. It revealed that over half of tested everyday consumer foods were contaminated with mineral oils dangerous to health and presenting a carcinogenic risk. The NGO claimed the problem had been known (by the industry and the authorities) for years but remained unsolved⁹⁸. Indeed, in 2011, another French consumer association alerted on the migrations of some hazardous substances from packaging to food⁹⁹.

Auchan was targeted in this campaign, as the retailer's own-brand coral lentils contained the highest level of mineral oil among all tested products. The company responded to Foodwatch that it had changed the packaging of the contested product. In a press release, Auchan said it was aware of the risks and had already been working on modifying the packaging. The new virgin fibre packaging was introduced from the February 2016 deliveries. Even though the answer was not judged satisfactory by Foodwatch, the NGO and the retail group shared a complementary approach. Both called on the public authorities to regulate the issue. Foodwatch sought national regulation, whereas Auchan at the EU level. While Foodwatch would like to see manufacturers obliged to take measures to prevent contamination by mineral oils hydrocarbons (zero tolerance), Auchan asked for more explicit regulations on this subject, including establishing thresholds and comparable and uniform methods of analysis.

⁹⁷ <https://www.actu-environnement.com/ae/news/emballages-cniid-grenelle-hypermarches-13024.php4>

⁹⁸ <https://www.foodwatch.org/fr/communiqués-de-presse/2015/des-hydrocarbures-dans-nos-assiettes-foodwatch-tire-le-signal-dalarme/?cookieLevel=not-set>

⁹⁹ UFC – Que choisir, Emballages alimentaires - Les hydrocarbures migrent, published on Sept, 27th 2011
<https://www.quechoisir.org/enquete-emballages-alimentaires-les-hydrocarbures-migrent-n2865/>

In November 2016, Foodwatch published results of their controls regarding actions undertaken by retailers to reduce the presence of potentially carcinogenic hydrocarbon derivatives in the composition of packaging that comes into direct contact with food¹⁰⁰. Among the retailers, most were identified by the NGO as "major players (that) have finally made a clear commitment to fight against the contamination of their products by substances that can cause cancer". Only Auchan was pointed out as a company that made not enough to solve the problem.

However, as a public health issue of this importance is at stake, the NGO considered it unacceptable "to rely solely on the goodwill of industry". Regarding the identified products, under the provisions set out in the Consumer Code, Foodwatch called the relevant authorities to order the suspension of their marketing, their withdrawal, recall and destruction. Moreover, it claimed that national regulations to be implemented concerning the acceptable quantities of aromatic mineral oils in food products. Foodwatch's leaders were received by the public authorities to discuss the issue. Also, in 2016 Foodwatch launched another public petition addressed to four French ministers (Consumer Affairs, Economy, Health, and Environment) asking for regulation on the issue. Again, in 2021, Foodwatch tested some products, indicating undesirable substations in some foods¹⁰¹. The latest public petition was launched in December 2021 and is addressed to the EU Commissioner in charge of Health and Food Security and heads of 27 Member countries. In two months, it was signed by over 73,000 people.

Further investigations and other scandals regularly revealed by Foodwatch pushed public authorities to seize the subject. Currently, at the European level, only one product is regulated (powdered baby milk). In France, the Circular Economy law introduced a gradual ban on using mineral oils on packaging and printings. In January 2022, public consultation regarding executive acts took place. Auchan participated in a concertation meeting with other members of the FCD and presented a common position. The main concerns were the duration of the transitional period, measuring methods, and degree of control over manufacturers.

¹⁰⁰ <https://www.foodwatch.org/fr/actualites/2016/aliments-aux-hydrocarbures-des-distributeurs-sengagent-le-gouvernement-traine/?cookieLevel=not-set>

¹⁰¹ <https://www.foodwatch.org/fr/actualites/2021/contamination-des-aliments-par-les-huiles-minerales-resultat-des-tests-foodwatch/>

Appendix 16. E.Leclerc's nonmarket interactions - environmental labelling and information provision

One of the paramount methods of raising consumer awareness of sustainability challenges is information provision (on the packaging or *via* on-site signage). Packaging is essential as information support, and various regulations are applied regarding the type of information that must be indicated. Consequently, the labelling rules enable the consumers to get comprehensive information about the content and composition of purchased products. Labelling also allows companies to differentiate their products by indicating additional facts regarding products.

In 2008, a pilot project on carbon footprint in E.Leclerc store in Templeuve resulted in an innovative program aimed at raising consumer awareness of the environmental impact of their shopping habits. It consisted of a dual display of products cost - in euros and CO₂ equivalent. Each customer was informed of the volume of greenhouse gas emissions induced by the production, distribution, and consumption of the purchased food product.

Figure 44. Example of a ticket with dual product costs – financial and environmental



Source: Toogezer magazine, edition Summer 2008 https://boutdumonde.eu/wp-content/uploads/2018/04/toogezer_n4.pdf, retrieved on Sept 20th, 2019.

Later, a complete advertisement system was developed (posters, leaflets, stands, insertions in leaflets, website) to inform clients about the environmental initiatives implemented in stores. The global awareness campaign entitled “I save my planet “ (in French *J'économise ma planète*) aimed to show the impact of food products on global warming while providing customers with the keys to act. Nevertheless, the environmental focus in advertising did not

last for a long time. Even though the communication campaign was judged satisfactory, these initiatives usually reach consumers in a shop's catchment area; thus, their effect is limited. Also, the company had to adapt advertisements and sell arguments to the targeted population.

Indeed, the labelling policy was often used by E.Leclerc as a marketing argument. In 2010, the group launched a new logo, "Lightweight packaging, preserved nature", for some of its own-brand products. Eliminating cardboard boxes for various products was a part of the global eco-design policy¹⁰². The suppliers of E.Leclerc own-brand products were encouraged to sign specific contractual engagements to protect the environment (in French *Contrats de progrès pour l'environnement*). At the end of 2010, four food products selected by the retailer according to the criteria of their composition, packaging, the information given to the consumer and price were granted the "E.Leclerc Responsible Consumption" label¹⁰³.

A specific measure born of the Grenelle Forum concerned the environmental labelling and establishment of multi-criteria indicators (to go beyond the reductionist approach of considering the environmental impact in terms of CO₂ emissions). In July 2011, a national pilot project was launched a year later than initially planned. The four voluntary companies - Auchan, Casino, Carrefour et Intermarché - were free to choose the medium (internet, packaging, shelves) and the data communicated to consumers (overall score or detailed figures per criterion). This full-scale testing of environmental labelling promoted by the French Minister of Ecology at that time - Nathalie Kosciusko-Morizet - covered hundreds of products and lasted one year. As part of the ADEME project, Casino tested 134 food products (three criteria used: greenhouse gas emissions (CO₂ eq.), raw water consumption, water eutrophication; communication support: front of products and website *indice_environnemental.fr*)¹⁰⁴, while Auchan tested only five private label food and non-food items (three criteria retained: global warming, water eutrophication, acidification of the natural environment; communication support: mailing to 75,000 customers). Nonetheless, the test was not conclusive. In particular, the FCD regretted the difficulties in gathering information from suppliers and required, as a prerequisite for any obligation relating to

¹⁰² Leclerc's eco-design policy has enabled a total reduction of more than 18,000 tonnes of packaging in ten years. For instance, the cardboard boxes were eliminated for toothpaste, mayonnaise tubes, as well as yoghurts by 4.

¹⁰³ <https://www.mouvement.leclerc/consommation-responsable-eleclerc-une-premiere-selection-de-4-produits>, retrieved on Sept, 20th, 2019.

¹⁰⁴ Since 2008, Casino group – the most advanced in product labelling among retailers - has offered 700 references of products indicating their carbon index.

environmental labelling, the creation of a reliable and consensual public database covering the main components and ingredients of the consumer products concerned and the conception of tools to support businesses.

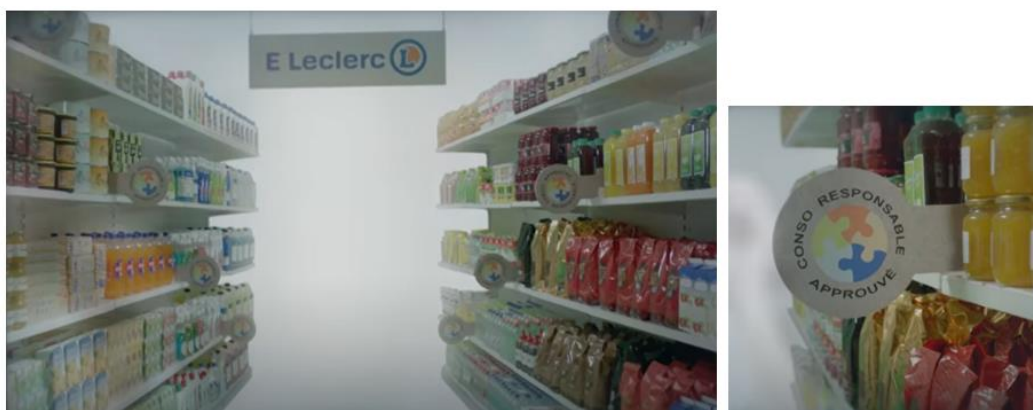
In this context, “E.Leclerc Responsible Consumption” label further evolved, as E.Leclerc announced in October 2011, into the new logo “Responsible Consumption Approved”. With this initiative, the group developed an advanced alternative scheme, unlike most of its competitors taking part in the national experiment on environmental labelling launched by ADEME.



Figure 45. The label created by E.Leclerc regarding responsible consumption

Various communication channels were activated to promote the scheme. The logo was displayed on a selection of products and in stores via shelf-stoppers. Moreover, it was advertised mainly on TV and through other media. Also, a dedicated website was created.

Figure 46. Images from E.Leclerc TV advertisement – Conso Responsable – 2013.



Source: <https://www.youtube.com/watch?v=VdAVBbDT9KM&t=24s> , retrieved on Sept 20th, 2019

The operation initially concerned 50 products (36 national brands and 14 private labels) and was quickly expanded to 700 items with an objective to cover 5% of the offer (i.e. 3000 products) by the end of 2012. E.Leclerc has defined multiple criteria, grouped into five main categories and 38 sub-categories. In addition to environmental characteristics, the retailer's approach included the nutritional aspect and three eliminatory criteria. However, the products were not appraised but simply classified as responsible according to the manufacturer's declaration (no third-party analysis or control).

The new logo did not necessarily facilitate customers' access to responsible products. Instead, it induced an additional feature in negotiations with the food industry and manufacturers (extra in-store advertisement by highlighting the efforts of the company's suppliers who declare producing more responsibly). The position of E.Leclerc group's head seems to confirm this dual interplay (toward suppliers and customers). M.-E. Leclerc considered "environmental labelling as a deterrent for consumers" while indicating on his blog that this logo was aimed to encourage innovation by suppliers and to provide a reference point for consumers who feel somewhat lost in the jungle of labels. Indeed, for consumers, creating a completely new logo brought nothing new regarding the quality of products, production methods or supply. By taking up the sustainable consumption speech codes, E.Leclerc created an alternative label – a new normative institution - rendering it more challenging to establish a universal system that all actors would recognize (economic, social and political).

Lastly, the additional advantage of establishing an independent logo is linked to savings generated for both company and the consumer. Affixing well-known sustainable logos (for instance Marine Stewardship Council or Forest Stewardship Council) on its packaging is subjected to a fee, which necessarily entails additional costs.

Until now, despite other projects conducted by ADEME, no single environmental information system on the product's impact has emerged in France. On the other hand, manufacturers multiply logos on their products, inducing more confusion among consumers. Still, almost a decade later, finding credible information regarding the environmental footprint of products is hard, while some NGOs already call on multi-criteria labels. Indeed, with time multiple social initiatives have emerged to rate products¹⁰⁵. Currently, none of the private

¹⁰⁵ For instance OpenFoodFacts and OpenProductFacts collaboration with numerous commercial applications indicating products' ratings.

initiatives is intended to be generalised in France. However, authorities continue working on establishing a unified official system, and self-regulatory initiatives could be continued with the idea of aligning afterwards.

In 2014, E.Leclerc was targeted by a direct social campaign. The first public campaign of Foodwatch association carried in France brought to light that the own-brand ham labelled “100% meet” contained only 84% of the meat. Several other products were indicated as presenting misleading information on packaging. The NGO’s objective was not to push the company to change recipes but to enforce transparency and possibly modify certain ingredients. According to Foodwatch, retailers have doubled responsibility as producers of own-brand products and as distributors who sell products without checking ingredients and adequacy of the provided information¹⁰⁶. The social pressure exerted by the NGO *via* its media campaign mobilised many consumers against misleading information on the packaging. Foodwatch launched an online petition that gathered nearly 100,000 signatures. Consumers have regained power and made companies accountable, expecting retailers to be more transparent and provide evidence in their quest to “consume better”. Products ought to be more virtuous and labels more legible. Consequently, E.Leclerc group preferred to respond to the demands of Foodwatch and ultimately modified the information mentioned on ham packaging.

In response to another scandal brought to light by Foodwatch regarding mineral oils, E.Leclerc was the first retailer to engage on the issue of cardboard packaging containing



Source:
<https://www.foodwatch.org/fr/actualites/2014/foodwatch-demarre-fort-monsieur-leclerc-reagit/?cookieLevel=not-set>



Source :
https://www.challenges.fr/challenges-soir/comment-l-ong-foodwatch-a-fait-plier-leclerc_76222

¹⁰⁶ “The whole chain must be held legally responsible: distributors cannot escape their responsibilities” - Ingrid Kragl, Information Director at FoodWatch France, https://www.huffingtonpost.fr/2014/05/06/jambon-dinde-leclerc-denonce-ong-foodwatch-grands-groupes-industriels_n_5272744.html

dangerous substances. This time, after a meeting between M. M.-E. Leclerc and leaders of Foodwatch held in September 2016, Mr M.-E. Leclerc announced on his blog that the company was working with the association to create new specifications for its own-brands' packaging.

Figure 47. Example of packaging modification by E.Leclerc

The company admitted that Foodwatch had a collaborative stance and was willing to cooperate on the issue, which is not necessarily the case for all NGOs. One of the possible solutions was to renounce the usage of recycled cardboard packaging when in direct contact with the foodstuff (replacing it with virgin cardboard). The company committed to modifying the relevant packaging by the first half of 2017 and no longer selling nationally branded products that pose a risk as of the 2017-2018 commercial negotiation campaign. Therefore, being oneself under social pressure regarding the packaging was later turned into a commercial argument used in the negotiations with the suppliers.

Over time, E.Leclerc has developed an open approach toward NGOs. The retailer has established a stakeholder panel composed of NGO representatives to challenge and enrich E.Leclerc's sustainable development policy. The structure allows the company to maintain dialogue with social actors and to benefit from their critical and constructive views. About ten stakeholders participate in these panels: environmental protection associations, international solidarity associations, and nutritionist specialists. Generally, two panels are organised each year, and the topics discussed at these meetings vary according to the issues at stake and current events. This collaboration with stakeholders on issues identified as potential risks helps to anticipate potential market and nonmarket disturbances.

RÉSUMÉ

Cette thèse explore l'autorégulation du point de vue de la stratégie hors-marché et vise à révéler le lien entre l'autorégulation et les changements dans l'environnement hors-marché via les mécanismes opérant dans le contexte politique et social d'une entreprise.

Nous proposons d'étudier dix cas tirés des deux entreprises dans le secteur de la grande distribution alimentaire en France, en identifiant les initiatives d'autorégulation dans le cadre de la prévention et gestion des déchets et étudiant la manière dont les entreprises les valorisent dans un contexte socio-politique.

A travers d'entretiens, d'analyse de données corporatives et sectorielles et d'une revue de presse, nos résultats permettent d'identifier trois mécanismes qu'une entreprise peut activer en mobilisant l'autorégulation dans l'environnement hors-marché: approuver l'engagement volontaire, transformer la géographie du pouvoir et façonner la réglementation. Nous proposons aussi un modèle des interactions entre les mécanismes.

MOTS CLÉS

Stratégie hors-marché, Autorégulation, Approche fondée sur les mécanismes, Grand distribution alimentaire, Gestion des déchets

ABSTRACT

This thesis investigates self-regulation from the nonmarket strategy perspective. In particular, it aims to reveal the link between self-regulation and the transformation of the firm nonmarket environment by comprehending how the changes take place.

We propose to study ten cases drawn from the two companies in the French food retail sector, by identifying self-regulatory initiatives for waste prevention and management and how companies leverage them in a broader socio-political context.

Through interviews, analysis of secondary corporate and industry-level data and press review, our results identify three nonmarket mechanisms that a company can activate by mobilising self-regulation in the nonmarket context: endorsing the voluntary commitment, transforming the geography of power, and shaping the regulation. We also propose a model of the interactions between the mechanisms.

KEYWORDS

Nonmarket strategy, Self-regulation, Mechanism-based approach, Food retail, Waste management