Beating the Microbead: How private environmental governance has influenced the regulatory process of banning microbeads in the UK.

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Abstract

Microplastics pollution in marine environments is one of the top global emerging conservation issues (Sutherland et al., 2010), with science gradually emerging about its detrimental impacts on animal welfare and human health. Microbeads have been identified as one source of microplastic pollution intentionally added to personal care and cosmetics products (PCCPs) (UNEP, 2015). Microbead governance has been subject to increasing involvement of private actors such as NGOs and businesses, besides government interventions through regulatory bans. Previous research suggests that private environmental governance has ambiguous effects in terms of democratic decision-making and transparency. This study advances our understanding of the type and impacts of private governance in the regulatory process of microbeads in the UK, drawing on the qualitative analysis of 3 expert interviews and 56 documents submitted to the government during the parliamentary inquiry phase. The case study analysis suggests that private governance of microbeads, in the form of voluntary certification schemes and corporate self-regulation, has the potential to significantly influence regulatory processes through their influence on power and market dynamics, and their ability to create a common discourse.

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Introduction

Problem Indication

Plastic production has increased from 15 million tonnes in 1964 to 311 million tonnes in 2014, and is expected to double again in the next two decades (World Economic Forum, Ellen MacArthur Foundation & McKinsey and Company, 2016). Plastic is cheap and versatile, making it the ideal material for single-use products. Yet, due to inadequate waste management and poor disposal, more than 8 million tonnes of plastic are dumped into the ocean every year (Jambeck et al., 2015). One tube of face wash alone can contain over 300,000 plastic microbeads (Lonne, 2017), which accumulate to an estimated 680 tonnes that are used in personal care and cosmetics products (PCCPs) in the UK every year (HC 179, 24 August 2016). These particles are too small to be captured by waste water treatment facilities, and therefore often end up in the marine environment. Plastic in the marine environment takes more than 400 years to degrade, and likely enters the food chain before that. It can thus be harmful to wildlife but also human health (Gregory, 2009) and has the potential to carry organic and inorganic contaminants (Teuten et al., 2009).

So far, governments around the world were unable to provide reliable solutions to complex, transboundary problems such as marine pollution. In fact, the limitation of states to effectively manage and regulate the marine environment has created avenues for private actors and new kinds of sustainability governance arrangements that have emerged in the last decade, witnessing novel types of interactions between private and public actors (Groeneveld, Bush and Bailey, 2017). For instance, non-governmental organisations (NGOs) and businesses increasingly collaborate to solve environmental challenges. These so-called intersectoral partnerships are defined as “collaborative arrangements in which actors from two or more spheres of society (state, market and civil society) are involved in a non-hierarchical process, through which these actors strive for a sustainability goal” (Van Huijstee, Francken, & Leroy, 2007: 77). They are one type of private environmental governance which is becoming an integral part of corporate engagement and corporate social responsibility strategies, shifting responsibility from the public to the private sphere in time of increasing information availability (Groeneveld, Bush and Bailey, 2017). Private governance is also connected to an increased individualism within society, where “the

citizen-consumer is now being counted on to exercise his or her citizenry (Iles, 2004) and change the infrastructure of consumption (van den Burg et al., 2003)” (Groeneveld, Bush and Bailey, 2017: 422). As a result, environmental certification schemes operated by civil society that encourage businesses to adopt environmentally responsible practices are on the rise and are increasingly being studied (Gulbrandsen, 2014; Cashore, 2002).

When actors from different spheres of society partner up for a common social cause, it changes the dynamics of decision-making and can have important implications, which are worth studying. Intersectoral partnerships are hailed for their ability to overcome governance deficits and bridge the gap between different actors that need to collaborate to solve ‘messy’ problems (Van Huijstee, Francken, & Leroy, 2007). It is widely acknowledged by policymakers and scholars alike that marine pollution cannot be addressed by one actor alone, but requires collective action “across national boundaries and with the private sector, which has a critical role to play both in reducing (...) wastes that end up in the world's oceans, and through research into new materials” (Achim Steiner in Thompson et al., 2011: iii). In fact, ocean governance requires more efforts than just management – namely diverse and effective institutions, new ideas of values and principles (Symes 2006) based on the circular economy, and collaborative action. Examples include fisheries certification and seafood recommendation lists such as the well-known Marine Stewardship Council, which formed as partnership between WWF and Unilever. This study aims to contribute findings to these new ways of governing marine pollution, focusing on the issue of microplastic pollution, which has so far received less academic attention.

As mentioned above, microplastics pollution in marine environments is one of the top global emerging conservation issues (Sutherland et al., 2010). The sources of microplastic pollution are varied, ranging from direct release of small pieces of plastic such as those added to PCCPs, and industrial spillage of pre-production pellets (Thompson et al., 2011: 9), to indirect release through abrasion of automotive tyres or microfibers released in washing machines from synthetic clothing (UNEP 2015). Direct sources are easier to tackle than indirect sources, which is why pre-production pellets and microbeads have been a prominent focus for action. For instance, the UK parliament’s Environmental Audit Committee started an inquiry in early 2016, followed by a public consultation of the Department for Environment, Food, and Rural Affairs (DEFRA) in December 2016, inviting written and spoken evidence from a range of stakeholders to make an informed,

evidence-based decision about a proposed ban on microbeads. On 21st July 2017, it announced its intention to ban the sale and manufacture of products containing plastic microbeads from 30 June 2018 onwards. Interestingly, even before a governmental decision was made, private actors such as NGOs and businesses had engaged in various forms of collaboration, engagement and partnerships, introducing private certification schemes and voluntary phase-out commitments. These private governance mechanisms raise important questions about transparency, legitimacy, and democratic decision-making. Therefore, this study will focus on (I) the collaboration of NGOs and business and the UK government respectively, and (II) the effects of this liaison on the regulatory process of banning microbeads in PCCP.

Concrete Research Objectives

In detail, this empirical case study will **assess to what extent private environmental governance has shaped the state-led regulation of microbeads in PCCPs in the UK.**

To trace this question, deep insights into motivations, strategies and reasoning held by different stakeholders about their involvement in partnerships will be given. Additionally, their strategies of environmental governance and their value parameters will be highlighted. Qualitative data analysis of expert interviews conducted with NGO and business representatives will be complemented by document analysis of written and oral evidence submitted during the UK parliament's inquiry into microbeads pollution, and the summary of responses of DEFRA's public consultation.

An analysis of the impact that intersectoral partnerships have on the political order of societies entails an examination of the "structures within which public issues are discussed and political decision-making takes place, and the content of political choices" (Glasbergen, 2011: 9). Therefore, the following detailed sub-questions will be answered:

1. To what extent has the voluntary certification scheme triggered market change?
2. To what extent have voluntary phase-out commitments by cosmetics companies affected the proposed regulation of microbeads pollution?
3. Is private microbead governance taking power away from democratic decision-making or is it an expression thereof?

4. Do intersectoral partnerships promote a convergence of sustainability discourses?

By tracing these questions, this research will reveal that the types of private governance concerned here – namely environmental certification scheme, and corporate self-regulation - have the potential to significantly influence regulatory processes through their ability to influence power and market dynamics, and to create platforms for a common discourse.

Chapter outline

The first chapter is will introduce the theoretical debates about the shift from government to governance, the role of private environmental governance in the management of marine pollution, and identify the research gaps which this study aims to fill.

The second chapter will explain why a qualitative case study analysis was chosen to answer the research questions, and map the sources of data used for analysis.

The third chapter will give an overview of the case study on microbeads regulation in the UK, mapping out the different NGO campaigns that have had influence on the regulatory process, the ways that businesses have engaged with the issue of microplastic pollution and how the problem is perceived in the wider public.

The last chapter will present the findings of the qualitative research applying a framework of analysis put forward by Bas Arts (2002), which sets out specific dimensions of analysis about the outcomes of collaborative partnerships between businesses and NGOs that strive for a common environmental goal. By answering the research questions, the last chapter will engage the reader in a discussion about the empirical findings and provide avenues for further research.

Theoretical Debate

From Government to Governance

At the World Summit on Sustainable Development in Johannesburg in 2002, intersectoral partnerships became formalised as they were declared an essential tool for implementing sustainable development (Van Huijstee, Francken, & Leroy, 2007). Since then, the increasing importance of the role of civil society actors and the market in sustainable development brought about a shift from ‘government to governance’ (Rosenau and Czempiel, 1992; Visseren-Hamakers, 2009). Indeed, as Van Huijstee, Francken, & Leroy (2007: 76) observe, “market parties and civil society organizations have (...) been invited to and have increasingly taken up their share of responsibility, thus opening up the policy arena to actors from other spheres or sectors of society”. Similarly, Cashore (2002: 504) has noticed that since the 1980s, domestic and international policy-making processes have increasingly been shaped by “procedures in which state policy-making authority is shared with (or given to) business, environmental, and other organized interests” and witnessed the increasing implementation of market-oriented policy instruments.

The rise of ‘privatization’ of governance brought in new actors and networks in intersectoral partnerships that complement existing intergovernmental collaboration and supplant the role of national governments (Hahn & Pinske, 2014; Bäckstrand, 2006). Partnerships bring together a specific set of actors that carry diverse perceptions and value parameters. As such, they are part of networks that govern society. As a result, “political power has become dispersed among a variety of public and private actors” (Glasbergen, 2011: 9), and partnerships are presented in the literature as “political spaces outside the formal political decision-making structures, or only loosely connected to them” (Glasbergen, 2011: 9).

Evidently, academic interest has recently focused on collaboration and partnerships between different actors, which has been studied from a range of disciplines, most prominently Public Administration, Sociology, Business Administration and Management Studies, Political Science, and to a lesser extent Anthropology, Economics and Ecology (Van Huijstee, Francken, & Leroy 2007). As a result, research on private governance

includes diverse areas of chemicals in food products, trade disputes, and environmental management systems (Levy & Newell, 2002).

Partnership literature has critically engaged with various types of governance such as environmental certification schemes operated by civil society groups (Schleifer 2016; Gulbrandsen 2014), international civil liability systems (Boyle 2005), environmental management standards developed by business-civil society collaborations (To and Lee 2014), and voluntary carbon markets (Newell and Paterson 2010). These partnerships tend to involve cross-sector collaboration and directly challenge long held understandings of the relationship between states and private actors (Falkner, 2003). Where ‘private’ actors are involved, the literature has referred to these kinds of interactions as ‘private sustainability governance’ (PSG) (Abbott, 2012) or private environmental governance, which are used here interchangeably. Such new forms of governance have various purported benefits: not only do they have the potential to overcome governance deficits in general (Biermann et al., 2007; Bäckstrand, 2008, Hahn & Pinske, 2014), and “inadequacies of interstate negotiations, institutions and policies” (Abbott, 2012: 543) in particular, but they essentially build bridges between actors that previously found it difficult to communicate (Selsky & Parker, 2005).

Indeed, much has been researched about private environmental governance and the prominent role that private actors play in institutional arrangements of various areas of governance (Schleifer, 2016). Most instances of private environmental governance are better explained as ‘hybrid’ or mixed regimes. This is because states and intergovernmental organisations officially recognize them or even legally incorporate them (Abbott, 2012) and because “the boundary between public and private spheres is blurred” (Clapp, 1998: 295). The creation of the ISO 14000 series - a range of global standards drafted by business representatives allowing multinational companies (MNCs) to apply environmental management systems in their operations in order to reduce transaction costs - has been a great success exactly because states and international organisations recognise the standards and confer legitimacy upon them.

Having established the different types of private environmental governance, the literature mentions several reasons for why they occur. Not only can their rise be explained in relation to inadequacies of national governments to deal with transnational problems.

Rather, processes of globalization, liberalization and privatization all contribute to the rise of private environmental governance (Van Huijstee, Francken, & Leroy, 2007). Authors argue that through a process called ‘sector blurring’ (Bozeman, 1987), such trends have steered the formation of new organizational forms. With the rise of the sustainable development paradigm, responsibilities that were formerly treated separately by different sectors of society, like economic development by businesses, protection of public goods such as social and natural capital by governments, and enhancement of social cohesion by civil society, are now becoming increasingly blurred. Thus, Van Huijstee, Francken, and Leroy (2007) rightly observe that we now increasingly face ‘messy’ problems like pollution, loss of biodiversity and unsafe labour circumstances, which are all exacerbated in their complexity by the increasing globalization of economic activity, by far exceeding the solution capacities of single actors.

In light of the emerging private governance structures, some scholars are concerned about the implications of the shift from public to private authority and the unfolding of market-based and regulatory approaches (Abbott, 2012). Neo-Gramscian scholars, for instance, consider private governance as expression of a wider ideological move towards the market, which is ultimately “structured and legitimized by a ‘global framework of domination’ led by elites from business, civil society and government” in which actors can shape and determine their sources of legitimacy and ultimately reinforce a neoliberal world order (Abbott, 2012: 549; Levy & Newell, 2002; Fuchs & Kalfagianni, 2010; Bäckstrand 2006). There are other dangers of ‘partnerships as steering mechanisms’ discussed in the literature, relating to the fear that they might: replace governmental obligations (Hens and Nath, 2003); reduce political pressure on governments to make binding agreements (Hale and Mauzerall, 2004) or lead to privatization of governance (Visseren-Hamakers, 2009; Falkner, 2003). In fact, closer analysis of the private governance paradigm reveals “complex connections” between “environmental governance and shifts in the relationship between firms, states, and civil society” (Falkner, 2003: 84). Considering these critiques of private environmental governance and its outcomes, it is important to study this phenomenon and its influence on decision making. In fact, Glasbergen (2011), notes in relation to partnerships that they “may help us to understand and evaluate the diversity, dynamics and complexity of governance in liberal-democratic societies on a more general level”, which is why it is important to study them “regarding their impacts on the political order of our societies” (Glasbergen, 2011: 9).

Such analytical focus requires an institutional perspective (see Van Huijstee, Francken, & Leroy, 2007) in terms of analysing the role of partnerships as mechanisms of private environmental governance. Pattberg (2004: 53) applies this perspective in the inquiry about “private rule-making and its functions in the field of environmental politics”, drawing conclusions about the various roles that private governance institutions can play in global environmental governance. Most research focusses on international environmental governance, however, there are few empirical case studies that look at intersectoral partnerships in relation to national regulatory processes. Arts (2002: 26) tries to answer the question about how stable and effective green alliances between NGOs and businesses can be “contributing to - or even substituting - environmental policy-making and regulation”. Nevertheless, his paper has a strong theoretical focus, and merely theorizes about history, strengths and weaknesses of green alliances rather than thoroughly analysing empirical case studies. Therefore, this study aims to build on his theoretical framework by applying it to an ocean governance issue which urgently requires collective action – microplastic pollution.

Ocean governance has so far not been a prominent focus in social science research on intersectoral partnerships. Ingrid Visseren-Hamakers (2009) has studied the contribution and impact of intersectoral partnerships and their role in intergovernmental sustainability regimes in relation to biodiversity governance. She concludes that partnerships can contribute a great deal to biodiversity governance by developing creative solutions and providing quicker and more effective action than through intergovernmental processes. Nevertheless, she cautions that “the growing contribution of private actors in biodiversity governance can also lead to blurred accountability structures and legitimacy questions” (Visseren-Hamakers 2009: 127). Her analysis relies on multiple case studies and expert interviews with practitioners, which provides it with rich qualitative knowledge but lacks generalizable findings. Similarly, there are many case study examples that show potentially positive outcomes of partnerships. Yaziji and Doh (2009) stress the “great gains” that business-NGO partnerships can achieve in terms of social welfare and economic value creation. In addition, Bitzer, Glasbergen and Arts (2013) explore the potential of intersectoral partnerships to improve the position of coffee farmers in Peru, and find that coupled with certification schemes, partnerships can lead to improved market access and environmental management. Thus, setting concerns about the dangers of private

governance for democracy aside, a multitude of scholars recognize that it can act as ‘force multiplier’ in the current sustainable development mission, and that any attempts at solving global challenges without incorporating ‘private’ actors are doomed to fail (Abbott, 2012; Kolk, 2014; Berlie, 2010; Paddison 2013). Yet, these findings merely reflect potential outcomes, and definitive claims about directly attributable effects of partnerships require further empirical research (Bitzer, Glasbergen & Arts, 2013). Importantly, empirical analysis is so far lacking for other transboundary problems like marine pollution, a gap this research attempts to fill.

There are however particular challenges relating to partnership impact and output measurement and many partnership advocates in fact appear to rely on anecdotal case study evidence (Pedersen & Pedersen 2013). Those partnerships that aim to address global problems like biodiversity conservation and marine pollution are very difficult to evaluate for their outputs and outcomes, as they are often complex collaborations involving multiple actors often along the North-South divide (Kolk, 2014: 13). In addition, NGOs and businesses themselves often do not track the results of their partnerships (Pedersen and Pedersen 2013) and apply different performance logics when evaluating social or environmental impacts (Hansen & Spitzek, 2011), which makes reaching conclusions about general impacts difficult.

In contrast, in terms of organisational and operational processes and factors influencing success or failure of partnerships, there has been some substantial academic analysis, especially about what motivates partnerships and how they are managed (Berlie, 2010; Kolk, 2014; Arts, 2002). In terms of failures in the process of partnering, Berger, Cunningham, and Drumwright, (2004) highlight six ‘misses’ inherent in many partnerships: misallocation of costs and benefits, mismatched partners, mistrust, misfortunes of time, misunderstandings, and mismatches of power, and propose various ways of pre-empting some of those predictable problems. With their analysis, the authors show that there are significant challenges faced by ‘social alliances’. Nevertheless, they stress that once these barriers are overcome, partnerships can be “important generators of value for companies, non-profits, and society at large” (Berger, Cunningham, and Drumwright, 2004: 88).

Private marine pollution governance

In relation to marine pollution, which is a complex transboundary governance issue, “formal governance through international institutions or instruments, regional organizations or governments alone cannot resolve this exponentially increasing environmental problem” (Vince and Hardesty, 2016: 126). In the light of a failure of local, regional and international governance to prevent plastics and other pollutants from entering the marine environment, the authors argue that a combination of governance solutions embedded in scientific expertise or what Haas (1992) calls ‘epistemic community’ is needed as they “offer a holistic, integrated approach to reducing litter and waste entering the oceans” (Vince and Hardesty, 2016: 123). Van Sebille et al., (2015) add that action is needed on all levels, and should be coordinated between policymakers, NGOs, the private sector and other relevant stakeholders. It is not just academics that call for increasing collaboration amongst actors and sectors of society: just recently, at the G20 Summit in Hamburg in 2017, world leaders recognized the “need for comprehensive multi-stakeholder involvement” and acknowledged the important role that non-state actors and private sector engagement plays in developing solutions to reduce marine litter (G20 Leaders’ Declaration, 2017: 1).

Academic interest in the field of marine pollution has gained prominence since the 1980s, when the first studies on the so-called ‘Great Pacific Garbage Patch’ emerged, a large area controlled by ocean currents where high concentrations of microplastic particles have accumulated (Day, Shaw, and Ignell, 1988). Since then, plastic production has increased twentyfold from 15 million tonnes in the 1960s to 311 million tonnes in 2014 and is expected to triple by 2050 (World Economic Forum, Ellen MacArthur Foundation & McKinsey and Company, 2016). New research is emerging about how much litter enters the ocean annually (Jambeck et al., 2015), the patterns of circulation (van Sebille et al., 2015), the impacts of marine debris accumulation on wildlife and ecosystem (Gall and Thompson, 2015; Rochman et al., 2015), and potential risks to human health (Thomson et al., 2009).

Such academic interest is mirrored by current media reporting on the issue. Most prominently, the media picked up information from a report published by the World Economic Forum, Ellen McArthur Foundation and McKinsey & Company (2016: 17) on *The New Plastics Economy – Rethinking the Future of Plastics* that warns that “in a business-as-usual scenario, the ocean is expected to contain one tonne of plastic for every three tonnes of fish by 2025, and by 2050, more plastics than fish [by weight].” With these daunting statistics, the issue of marine pollution has recently gained traction and its inclusion in the SDGs means that marine pollution has been placed on the sustainability agenda.

This section has reviewed the literature on private environmental governance and intersectoral sustainability partnerships, and has revealed that despite recent public attention, social science research on marine pollution in general, and microplastic pollution in particular, has been minimal. In addition, as discussed above, there are little empirical findings about the role of private ocean governance in national policy-making. To contribute in both fields, and critically engage with some of the critiques about private governance, the UK’s recent regulatory action on microbeads has been chosen as a relevant case study. It represents an issue of ocean governance that has seen much private involvement, for example NGO campaigns, intersectoral partnerships between NGOs and businesses, and corporate self-regulation, whilst at the same time being governed by state regulation. As such, it enables an investigation of the impacts of private environmental governance on regulatory processes.

The next chapter is going to outline the qualitative research design of this study, explain the methodology, and give a brief background description about the case study on microplastic pollution in the UK.

Methodology

Applying qualitative methods in partnerships research is not a new technique and has delivered important findings and insights about the experiences of actors involved, the challenges they face during the different partnership phases (Brunsting 2014), and the outcomes, strengths and weaknesses of partnerships (Visseren-Hamakers, 2009).

In this study, qualitative methods are combined with a case study approach to gain deep empirical insights about the implications of private governance in relation to microplastic pollution. A case study is a research strategy “which involves an empirical investigation of a particular contemporary phenomenon within its real life context using multiple sources of evidence” (Yin 2009: 145), whilst attempting “to illuminate a decision or set of decisions: why they were taken, how they were implemented, and with what result” (Yin, 2003: 12).

The sources of evidence for the case study are gathered using semi-structured interviews and document analysis - thus a combination of methods, which is called triangulation (Bowen, 2009). ‘Triangulation’ of different qualitative methods is useful for corroborating the ‘social facts’ produced (Bowen, 2009), especially when time and resources are too limited to produce a single type of data with enough validity. Triangulation is also important for taking into account multiple perceptions and for clarifying meaning and verifying repeatability of an interpretation, and it is necessary to avoid misinterpretation (Stake, 2005). As part of this interpretive research, the researcher sticks close to the character of the data, in this case words from documents and interview transcripts, which are attributed with sources of meanings. The resulting data is then categorized using interpretive content analysis. It serves to provide data on context (Bowen, 2009) and actor’s perceptions.

Interviewees were selected based on representation and relevance. Interviews were conducted with the UK-based NGO Fauna & Flora International (FFI), which is leading the national Microbead Coalition, and the Dutch-based NGO Plastic Soup Foundation (PSF), which is leading the international coalition Beat the Microbead, and was involved in the establishment of a voluntary certification scheme called *Zero Plastics Inside*. There are several UK-based cosmetics manufacturers that have acquired it. In addition, a semi-structured interview with Weleda, a Swiss-based multinational natural cosmetics company

was conducted. This company was one of the first to be voluntarily certified with the *Zero Plastics Inside* logo, and has therefore been selected to represent a leader in the field of microplastic reduction efforts.

Semi-structured expert interviews “give substance and meaning to prior analyses of institutions, structures, rule-making, or procedural controls” (Hochschild, 2009: 1). Yet, research participants may be affected by the research process. As a qualitative researcher, heightened reflexivity is an important aspect of data analysis. Selves are shaped by prior experiences, which in turn shape their perceptions and understandings. As such, not only the researcher but also interviewees shape the research process with their own preconceptions and interests. Thus, it is useful to guard against such investigator’s bias complementing this method with other methods like document analysis. Conveniently, documents are unaffected by the research process, and thus lack obtrusiveness and reactivity. Nevertheless, document analysis alone is limited as documents are produced independently of a research agenda and thus may not provide sufficient detail to answer the research question. In addition, there is a danger of biased selectivity if document collection is incomplete (Yin 1994, p. 80 in Bowen 2009). Therefore, all 56 documents that were submitted during the parliamentary inquiry were analysed.

Based on documents and semi-structured interviews, this study will firstly uncover the distinct roles of different actors during the proposals phase, and discuss their motivations and strategies for contributing to the regulatory process on microbeads. Secondly, the results will reveal the type and composition of alliances and collaborative arrangements that exist between diverse actors, for example between NGOs and businesses. These will be analysed to assess their governance functions (see Arts 2002). Lastly, the study will demonstrate the extent to which these alliances and actor-constellations are an expression of private governance, and whether this has the potential, as theorized in the literature, to influence decision-making through underlying power dynamics and a convergence of sustainability discourses.

Case Study: Microbead Governance in the UK

Table 1: Timeline of microbead regulation

Source: Author, 2017

During the 1990s, many cosmetics companies discovered microplastic polyethylene particles, or short microbeads, as cheap and useful ingredients for their product formulations. Since then, plastic ingredients have been used in rinse-off products such as shower gel, face scrubs, and toothpastes and leave on products such as make-up foundation, hairspray, nail polish, liquid makeup, lotions and sunscreen (UNEP, 2015). Environmental assessments that were carried out to test potential toxicity of such ingredients and their risks to human health and the environment did not raise any concerns about negative impacts (HC 179, 29 June 2016). Two decades later, scientific evidence has revealed the potential detrimental physical and chemical impacts that microplastics can have on marine species

and ecosystems (Thompson et al., 2004; Thompson et al., 2011; Van Sebille et al, 2015). Microbeads intentionally added to cosmetic products were identified as one source of such microplastic pollution. Experts suggest that around 680 tonnes of plastic microbeads are used in the UK annually, and 100,000 plastic particles can be released into the sewage system with each shower (Thompson et al., 2004). Microplastics from cosmetics products are estimated to amount to 0.01% to 4.1% of all microplastics entering the marine environment (HC 802, 14 November 2016). Other sources include plastic microfibers that disintegrate from clothing, tyres and larger items floating in the marine environment that break down into smaller pieces. The cosmetics industry argues that microbeads only comprise a very small percentage of the overall microplastics found in the ocean, but it is an easily replaceable and arguably unnecessary substance, which is why regulators have focused on it (HC 179, 29 June 2016).

International action on microbeads has been coordinated by the PSF together with the North Sea Foundation. Both organisations have been at the forefront organizing an international coalition of NGOs through their Beat the Microbead campaign from 2012 onwards. The goal of the campaign is oriented towards partnerships in that it aims to engage mainly with MNCs to advise them on voluntary phase-outs and best practices to develop sustainable products. Part of the campaign involves a certification scheme called *Zero Plastics Inside*, which offers a logo and a platform for companies to be recognized as environmental leaders, and provides transparency to consumers. NGOs have thereby responded to the lack of transparency and information governance around microplastics pollution by engaging with companies and educating consumers – two aspects that were found crucial in leading to the regulatory proposal. These types of private governance link individual responsibility of the so-called citizen-consumer (Groeneveld, Bush and Bailey, 2017) with increased information availability in a digital age. For instance, consumers can download an app with which they can screen PCCP barcodes to determine whether the product contains microplastics. Consumers in this governance arrangement are thus hailed as driving force for change, because not only can they pressure companies to uphold their commitments or adopt commitments if they have not done so before, they can also hold them to account for their actions, and limit their market share through boycott activities.

NGOs in the UK started campaigning and gathering information about the microplastic problem from 2010 onwards. The main players are FFI, the Marine

Conservation Society (MCS), the Environmental Investigation Agency, and Greenpeace. All NGOs collaboratively form the Microbead Coalition and have individually and jointly provided written evidence during the inquiry phase of the Environmental Audit Committee (EAC). In support of the global Beat the Microbead campaign, FFI gathered a comprehensive database about products containing microbeads in the UK, which eventually led to the publication of the *Good Scrub Guide* (Fauna & Flora International, 2016). This comprehensive guide forms part of FFI's strategy to tackle microplastic pollution by engaging constructively with companies to encourage them to phase out microplastic ingredients. The Microbead Coalition mainly engages with small and medium sized enterprises (SMEs), whereas the Beat the Microbead campaign has focused corporate engagement on multinational corporations (MNCs). As such, both governance strategies impact the UK regulatory process, which is why they have both been chosen as matters of investigation.

At the same time, companies themselves have started self-regulatory action by publishing commitments to voluntarily phase out plastic microbeads from rinse-off cosmetics products. Their commitments have been ranked according to four criteria: 1) commitment and information transparency; 2) definition; 3) deadline; 4) application scope (Greenpeace, 2016). In fact, NGOs criticise voluntary commitments for failing to achieve environmental outcomes. FFI, for instance, reviewed 1300 UK PCCPs and found that 16% of them still contained solid microplastic ingredients (EIM0016, 20 April 2016). Nevertheless, the criteria reveal interesting insights about the nature of corporate self-regulatory action, the 'business perspective' and the potential impact of corporate self-regulation on policy making, and will therefore form another pillar of private governance investigated here.

To sum up, the case study presented here will investigate the policy process on microbeads regulation and the different actors and coalitions involved. This will reveal the impacts that private governance has on the regulatory process, the power relations that exist between different actors and within partnerships, and the discourses that are employed to advance different interests regarding sustainability. Before proceeding to examine these findings in more detail, it is useful to set the research into the context of policy-making. Kingdon's agenda setting theory proposes various stages, the first composes a list of problems or issues to which policy decision-makers pay serious attention. Moving an issue

higher up on the agenda involves three phases, namely problems, proposals and politics (Rawat and Morris, 2016). Microplastics as an issue debated in Parliament and the House of Commons has passed the agenda setting stage and is now being discussed in government. Documents of the parliamentary inquiry of the EAC and DEFRA's consultation process are analysed here form the basis for the proposal of new legislation. They are an interesting source of data because they reveal the different perspectives that actors bring to the discussion on microbeads, their view and definition of the problem, and what kind of regulation they favour.

Results and Discussion

Private environmental governance arrangements impact the political order of societies by influencing the structures within which public issues are discussed and political decision-making takes place (Glasbergen, 2011). To understand how this occurs in the context of microplastics regulation, the institutional perspective applied by van Huijstee et al. (2007) is used as a starting point. The institutional perspective looks at partnerships as new arrangements in the environmental governance regime, thus analysing the shift from government to governance and their role in sustainability governance. In addition, the evaluative approach applied in this research draws on the theoretical framework put forward by Bas Arts (2002), which sets out various dimensions of analysis on partnerships' impacts, some of which are elaborated here. These include (1) actor coalitions and actions, (2) power relations and (3) sustainability discourse. An analysis of these dimensions gives an understanding about the types of collaborative governance arrangements that exist on microplastic pollution; the emergence of innovative ideas and forms of dialogue; the underlying power structures that shape the regulatory process, and the enhancement of a common understanding about the issue of microplastics through a divergence of sustainability discourses. Ultimately, these outcomes lead to broader conclusions about the role of private governance arrangements in regulatory processes.

(1a) Private governance: actors, coalitions, and actions

The literature on partnerships distinguishes between different types of collaborative arrangements, ranging in type, number of actors involved, scale, intensity, activities and intentions (Van Huijstee, Francken, & Leroy, 2007). Glasbergen and Groenenberg (2001) categorize collaborative arrangements into informal, extensive co-operation and formal, intensive co-operation between private actors. Arts (2002) in their analysis of 'Green Alliances', notice that generally, informal and extensive cooperation creates rules of the game that are flexible and open, but that the success of the partnership in terms of environmental outcome is limited because business practices are unlikely to change. If it is intensive, formal cooperation, then the nature of the alliance is closed and rather inflexible as it is much more tied in with business traditions, but the potential environmental profit

can be large. Partnerships in this case study can be defined as informal and extensive collaborative arrangements with flexible rules.

On the national level in the UK, engagement occurs between NGOs and SMEs, rather than MNCs. This stands in contrast to what is observed in the partnership literature, where partnerships are mostly between MNCs and NGOs, since smaller companies often do not have the resources and personnel to do so and large international companies have more influence on market demand (Visseren-Hamakers, 2009; Van Huijstee, Francken, & Leroy, 2007). The reason that partnerships between the Microbead Coalition and MNCs do not occur can be explained with the fact that smaller companies are the ones seeking expertise and advice when engaging with NGOs, whereas larger MNCs have their own team of scientists that offer them strategic and scientific advice. Intersectoral partnerships in this case are open and flexible, as they are not institutionalized and are mainly part of an NGO campaign rather than constituting a platform for action.

Interestingly, the type of collaborative arrangement between NGOs and businesses is not only influenced by the different levels of resources that companies are equipped with, but also by NGOs' different strategies of engagement. Generally, NGOs of the Microbead Coalition engage with businesses on an informal basis. However, closer examination of documents and expert interviews revealed that individual NGOs have different strategies of engagement (Interviewee FFI, 03 July 2017). FFI and MCS took a "constructive, positive and collaborative approach" when engaging with businesses, which ultimately proved "really beneficial" because it meant that companies were comfortable talking to them as a stakeholder in that process and were more willing to share information and positions with (Interviewee FFI, 03 July 2017). Such an approach is also reflected in the Good Scrub Guide published by FFI (2016), which compiles a list of companies whose products are free from microplastics, offering consumers the opportunity to influence companies with their purchasing power. Cooperative tactics like these encourage businesses to get behind a public cause (Yaziji & Doh, 2009). Contrary, other NGOs have relied on adversarial campaigning and naming and shaming through publishing rankings with companies that lag in their microbeads commitments (Greenpeace, 2016). Both strategies have enabled NGOs to influence not only business behaviour, but to build up public support and pressure governments into action.

Another type of private governance that has played a role in microbead regulation is corporate self-regulation on microbeads. Generally self-regulation is used by firms to obtain a ‘social license to operate’ and is usually incorporated into their Corporate Social Responsibility (CSR) strategy (Brunsson 1989). According to new institutional theory, corporations conform to societal norms and values, since doing so enables them to maintain legitimacy in the face of potentially competing demands, expectations and pressures (Brunsson 1989). In addition, corporate self-regulation provides firms with the potential to improving long-term profitability and thereby enhancing competitiveness (Bansal and Roth).

Having reviewed the actor constellations that have had an impact on the regulatory process by analysing different actors’ motivations and strategies of engagement, it becomes clear that the main types of private microbeads governance consist of: intersectoral partnership in the form of an informal voluntary certification scheme and informal engagement between businesses and NGOs; and corporate self-regulation in the form of voluntary commitments to phase-out plastic microbeads from rinse-off cosmetics products. Analysis has shown that intersectoral partnerships are shaped by the resources and values of individual actors involved, which in turn influence their strategies of engagement. The next section is going to assess in what ways these private governance moves have been able to achieve their environmental aims and thereby influence the regulatory process.

(1b) Private governance: impacts

Intersectoral partnerships aim for sustainability goals that involve making commodity chains more sustainable. However, in order to transform a ‘normal’ market that allows microplastic particles to be used in the cosmetics industry, into a ‘green’ market where companies that still use microplastic ingredients lose competitiveness, partnerships need to influence the governance structure of the supply chain by addressing the most powerful actors (Glasbergen, 2011). In order to do so, they need to influence the authority and power relationships of supply chain actors. The Zero Plastic Inside certification scheme’s primary objective was always to educate the consumer rather than to change market dynamics (Interviewee PSF, 21 June 2017), thus, it has been limited by its informal and open ‘rules of the game’ from the start. Compared to institutionalized intensive partnerships such as

the Marine Stewardship Council (MSC), the position and influence of informal, open certification schemes to achieve sustainability goals in terms of market change is limited. In addition, since large MNCs that have the ability to influence market demands are not formally part of the certification scheme, the partnership's influence on changing market demand is limited. Businesses, despite having the will to change their practices towards more sustainable production, are still bound to competitive market laws, which makes it difficult for any type of sustainability partnership alone to be successful (Arts, 2002).

Besides the limitations of voluntary certification schemes, triggering market change and thereby successfully governing a sustainability issue also depends on the type of product or issue that is to be regulated. Microbeads are intentionally added and popular amongst cosmetics producers for their low costs and diverse application. Nevertheless, unlike certification schemes that target products used in diverse and large supply chains such as the Forest Stewardship Council, or the Roundtable on Sustainable Palm oil, the Zero Plastic Inside certification targets end products used in small supply chains, namely cosmetics that do not contain microbeads. On the one hand, this could limit the leverage power with which partnerships achieve change. On the other hand, it could result in more successful partnership outcomes because it is easier to get all stakeholders involved and therefore change practices quicker. It lies outside the scope of this study to further investigate whether the size and complexity of the supply chain network that the product is used in, has any effect on the influence that certification scheme exert on markets and regulatory processes, which could be subject to further research.

Turning now to voluntary corporate self-regulation, there is evidence to suggest that it is mainly driven by the fear of government regulation rather than by environmental or social goals (Gunningham and Rees, 1997). In fact, statements made by representatives of multinational cosmetics companies suggest that voluntary commitments to phase-out the use of microbeads in rinse-off cosmetics products were made to transmit the image of a responsible industry and make regulation unnecessary. For instance, Ian Malcomber of Unilever argues that

We are in favour of industry taking responsibility, so we are in favour of an industry-led action through our trade association. We were one of the first to get out and I am quite pleased that our industry colleagues are following on that. I think we would hope that a legislative ban would not be required (HC 179, 29 June 2016).

But there is also a strong opinion in the documents and transcripts analysed that voluntary commitments made by many MNCs have paved the way for regulatory action, not least because they facilitated dialogue between different actors by signalling their readiness to engage in the debate. Analysis indeed suggests that private and public actors alike regard voluntary commitments as a crucial first step towards acting on microplastic pollution. The NGO expert voiced a similar opinion during the interview:

The corporate commitment and actions on this particular topic is the reason why there was regulatory action. Ultimately, regulators don't like to impose rules and actions unless businesses are on board and unless change is already being seen. It was actually that the activities across businesses in the cosmetic industry is what supported the introduction of regulatory reform around the world. (Interviewee FFI, 03 July 2017)

Both observations are compatible explanations for the impacts of corporate self-regulation on policy-making: on the one hand, firms gain legitimacy in the eyes of consumer-citizen, who are concerned about the impacts of microbeads on the marine environment; on the other hand, this legitimacy enables businesses to participate in dialogue with NGOs and the government, creating opportunities for participatory decision-making. A third explanation might be that it was the realization about the inadequacy of voluntary commitments that eventually led to government intervention. Some companies set their time frame for phasing out microbeads until 2020, and there is always the concern that commitments being voluntary, some companies might not phase out at all. Indeed, the government recognizes that “voluntary action alone will not be adequate to tackle the challenges of microbeads, and believe that a legislative ban would be beneficial in bringing greater consistency in the industry” (HC 802, 14 November 2016: 4).

(2) Power relations

Nevertheless, there are concerns that what might be perceived as the creation of dialogue and participatory decision-making, is in fact a process of entrenching existing power structures, mirroring the domination of democratic procedures by powerful actors (Levy & Newell, 2002; Fuchs & Kalfagianni, 2010; Bäckstrand 2006). In this view, private governance is perceived as undemocratic. In order to investigate whether such theorization applies in the context of microbeads regulation in the UK, the next section is going to investigate the power relations that exist between actors and will assess the extent to which

unequal power relations influence the regulatory process. This will determine if private governance can be a move towards more, or less, democratic decision-making.

Mismatches of power in intersectoral partnerships is not a new occurrence (Berger Cunningham, and Drumwright, 2004; Kolk 2014; Setanidi & Ryan, 2007). According to neo-marxist view of power, it should be assumed that large multinational corporations have more power than NGOs and even some states (Balanya et al., 2000), and therefore have more resources to determine partnership strategies and influence the regulatory process. Yet, the configuration is not as simple as neo-Marxists propose: firstly, power has many dimensions (Lukes, 2003; Keohane and Nye 1989) and consists not only of economic resources but also political, cultural and knowledge based resources; secondly, partnership dynamics are diverse, and operate in specific institutional and political contexts. It is thus important to investigate business-NGO relations in terms of power distribution.

In the debate about the regulatory proposal for a ban on microbeads in the UK, NGOs were influential in terms of providing knowledge and expertise. In parliamentary debates, members of the committee often cited evidence provided by NGOs and in their final proposal, NGO demands in terms of wording and definition of microplastics were given due diligence. Overall, NGOs have proven to be more capable and knowledgeable than most companies about environmental issues and debates around microbeads. As Levy and Newell (2002: 96) have rightly observed, “NGOs are sometimes able to compensate for their lack of resources by coordinating their efforts, appealing to moral principles, and exploiting tensions among states and industry sectors with various interests”. NGOs of the Microbead Coalition have proven to be well equipped to communicate their values with the larger public and policy-makers through their outreach campaigns (Beat the Microbead; Good Scrub Guide; petitions). In the certification partnership, NGOs were the ones initiating the scheme and defining the terms of contract. Contrary to well-established certification schemes such as FSC or MSC, where relevant stakeholders all decide on the terms and strategies of the scheme collaboratively, the partnership on microbeads is one sided in that the rules of the game are set up by one stakeholder. Nevertheless, NGOs enjoy public support and higher levels of trust compared to businesses or governments (Jepson, 2005), therefore it cannot be argued that their discretionary power is undemocratic per se.

Similarly, corporate self-regulation involves the privatization of rule-making and enforcement (Gunningham and Rees, 1997), which means that companies can set their own definitions of the issue of concern, define the time frame for action, and set their goals without being monitored or regulated by the state. Some scholars therefore criticize that companies' voluntary self-regulation tactics merely serve private interests at the expense of the public needs (Gunningham and Rees, 1997). Nevertheless, the case study findings suggest that the government regarded public needs over private interests. This becomes especially clear when comparing the UK case with the US Microbeads-Free Waters Act. The latter applies wording in terms of problems and solutions that is much more in line with that of businesses. In fact, the ban was passed through congress so quickly because businesses were instrumental in defining the ban (EIM0042, 08 June 2016). The US government proposed legislation to ban microbeads from "rinse-off" cosmetics, including toothpaste, that contain intentionally added microbeads and are intended to exfoliate or cleanse the body (FDA, 2016). Such wording narrows the scope of the ban to products that are intended to exfoliate or cleanse the body, rather than all products which could potentially be rinsed-off through the drain. On the contrary, the ban proposed in the UK leaves less room for loopholes to be exploited by companies. It similarly proposes to ban the use of plastic microbeads used in rinse-off cosmetics and personal care products. Nevertheless, the government goes one step further by recognizing that microbeads can potentially reach the marine environment through the application of other products, and therefore review available evidence on the existence of solid plastic particles in products that are not covered by the 'rinse-off cosmetics and personal care products' definition, together with the Hazardous Substances Advisory Committee (DEFRA, 2017).

Whether this outcome is the result of a more powerful NGO coalition, a more precautionary approach followed by the government, or of intersectoral partnerships that have shaped business' discourse on sustainability is difficult to determine due to the complexity of the decision-making process and the diversity of variable that influence it, and requires further research. Nevertheless, it can be concluded that the power dynamics exist between different actors, and that they have the *potential* to significantly influence on the regulatory process.

(3) Sustainability discourse

Having established that private governance is not a uniform process but rather shaped by power relations, actor coalitions and different rules of the game, it is now important to turn to the sustainability discourse, which reveals whether there has been a convergence or divergence of ideas about sustainability as a result of collaboration and engagement, and the extent to which it merely serves greenwashing purposes.

The sustainability discourse has been shaped by the Brundtland commission's *Our Common Future* report, and the UNCED's Agenda 21 and "has made the (partial) integration of opposite views on ecological and economic issues possible (WCED, 1987)" (Arts, 2002: 33-34). With the establishment of the Sustainable Development Goals (SDGs), mainstream economist and environmental activists alike have increasingly embraced the sustainability paradigm. Reflected in CSR reports, and official statements about self-regulatory action, companies place increasing importance on communicating their efforts to improve their social and environmental impact, thereby promoting and directing the sustainability agenda (Barin-Cruz & Boeche 2008). In relation to marine protection, "CSR can reflect a firm's intrinsic values associated with its use of the (marine) environment, or promoting its own values in the practices of those purchasing their products (...)" (Groeneveld, Bush & Bailey, 2017: 422).

The extent to which an organization embraces the precautionary principle gives an indication about its true intentions to contribute to sustainable development. The precautionary principle is an integral part of sustainability discourse and, as Feintuck (2005) argues, has

a potentially crucial ideological function as an instrument for ensuring that collective, often non-economic, democratically-derived interests are given due prominence in processes which may otherwise be dominated and/or damaged by economic interests and related technological imperatives claiming legitimacy through "science" or scientific certainty (Feintuck, 2005: 398).

Given the significance of the precautionary principle, UNEP (2015) recommends its application in the management of microplastics, considering the associated potential risks to wildlife and human health.

Analysis of CSR statements of the 30 companies that are certified with the Zero Plastic Inside Logo suggests that all share the same ideas about sustainability, the definition of microplastics and the application of the precautionary principle. By signing the PSF's statement: "*We as a producer declare that all of our products from the brand [...] are 100% microplastic free*" (Plastic Soup Foundation, 2017), they accept that microbeads are only one source of microplastic pollution, and that plastic particles added to any type of cosmetics products, whether rinse-off or leave-on, can potentially find their way into the marine environment and should therefore be eliminated. Even though scientific evidence on the impacts of non-solid plastic polymers is limited, the approach taken by the partnership is that industry and science should prove that they are not harmful to the environment before widely applying them in their product formulations.

It is not surprising that these companies share a common sustainability discourse with the one followed by NGOs, considering that most of them have been so-called 'environmental leaders' before becoming *Zero Plastics Inside* certified. Yet, it can be argued that the integration of sustainability into core business values is not a development to be taken for granted, and that engaging in intersectoral partnerships has promoted such development by creating a new environment to discuss sustainability issues and providing transparency to the consumer. As Glasbergen (2011: 10) observes, despite exemplifying a restricted discourse that is shaped by a non-representative set of actors, partnerships can be "powerful conceptual innovators that define or redefine existing dialogue on how problems are framed and what solutions are available" and thereby "change the governability of societies in a structural way". Given that most demands raised by the NGOs and followed by the partnership have been addressed by the government's final proposal of the ban (Rakowski, 2017), it can be argued that indeed, the dialogue around the framing of the microplastics problem and the proposal of solutions was successful in terms of advancing regulation that takes account of sustainable development.

At the same time, discourse is shaped by companies outside of formal partnerships that only engage with NGOs informally, indicating that there is disagreement at a more fundamental level between those inside and outside partnerships. Indeed, this disagreement is reflected in the limited definitions of microplastics used by companies. As already

established in the previous section, influencing the wording of the ban is important as it has major impacts on the resulting regulation.

Companies, through their self-regulatory action, have not only shaped the term microbeads but also disregarded the precautionary principle. Thereby, they have created a separate discourse. On the one hand, the term ‘microbeads’ is generally unhelpful not only for guiding state regulation but also industry self-regulation. As established, the term is used to describe solid pieces of plastic that exfoliate, rather than encompassing a range of functions that microbeads can have in a range of cosmetics products. On the other hand, it is commonly used by the cosmetics industry to refer to intentionally added solid plastic particles smaller than 5mm, and is commonly used in rinse-off products such as toothpaste and body scrubs.

It makes sense for industry to refer to this term to narrow the scope of the definition for rinse-off products, as these limits the scope of action that companies sign up to. However, the voluntary commitments have been criticized for applying such limited wording, only referring to one type of plastic, polyethylene, excluding other types which can have potentially negative impacts on the marine environment. In addition, NGOs criticize that wording refers to only rinse-off products and not all product types (Greenpeace, 2016), and that their commitments do not explicitly exclude the use of biodegradable plastics and a lower size limit for particles being phased out (EIM0016). During parliamentary hearings, businesses repeatedly resorted to the argument that the scientific evidence for widening the scope of microbeads is lacking, and that following a business-as-usual approach is therefore justified.

Evidently, their sustainability discourse is limited, and the self-regulatory actions proposed are insufficient to adequately address the problem of microplastic pollution. One might jump to the conclusion that this is a clear sign of greenwashing, since businesses usually use self-regulation to gain legitimacy. Nevertheless, considering that greenwashing is evaluated according to the gap between rhetoric and reality (Rhee and Lee, 2003), a closer look on companies’ voluntary commitment reveals that they do not attempt to create a rhetoric which they do not intend to fulfil. Rather, their rhetoric is limited, thereby failing to fulfil adequate commitments as judged by other actors (Greenpeace, 2016). What we see here is thus inadequate commitments that limit action rather than limited actions that fail to fulfil adequate commitments.

Conclusion

The research presented here filled a double analytical gap in the literature by examining the impacts of private environmental governance on policy-making in the context of marine pollution. By doing so, it has confirmed some theoretical findings on intersectoral partnerships' outcomes, whilst disproving others. NGO-business alliances are shaped by many factors including power dynamics, material resources, culture, and institutional setting, and therefore have unique outcomes.

The private governance mechanisms applied to microbead management have different goals and therefore different impacts on the regulatory process. Intersectoral partnerships aim for making commodity chains more sustainable by influencing the authority and power relationships of supply chain actors. The *Zero Plastics Inside* certification fails to influence the market since the scheme's primary objective was always to educate the consumer rather than to change market dynamics. Corporate self-regulation's aim is to avoid government regulation and gain legitimacy. On the one hand, it enabled firms to gain legitimacy in the eyes of consumer-citizen, who are concerned about the impacts of microbeads on the marine environment; on the other hand, this legitimacy enabled businesses to participate in dialogue with NGOs and the government, creating opportunities for participatory decision-making.

Concerns have been raised in the literature that what might be perceived as the creation of dialogue and participatory decision-making, is in fact a process of entrenching existing power structures, mirroring the domination of democratic procedures by powerful actors and thereby making private governance undemocratic. Analysis has revealed that the partnership assessed here has not suffered from the typical neo-marxist power imbalance between businesses and NGOs. Rather, power has been harnessed by less powerful actors for the advancement of sustainable goals. Another concern in the literature was that through corporate self-regulation, businesses can privatize rule-making by setting their own definitions, time frames and goals. Nevertheless, the case study has revealed that despite such powerful strategies, businesses in the UK have not been able to influence the regulatory process in the same way that they have in the US. Further research on corporate power in policy-making could investigate the different factors that led to this outcome. For

now, it can be concluded that power dynamics shape private governance, and that they have the *potential* to significantly influence the regulatory process.

The study has found that private governance shapes discourses about sustainability, and that, depending on whether the business is engaged in a partnership or not, its discourse either aligns with sustainability goals or diverges from it. All companies engaged in the certification partnership have integrated a common discourse about the definition of microplastics and the application of the precautionary principle. Thus, it is argued that the certification partnership has strengthened the sustainability discourse by creating a common platform for dialogue and collective action. Private governance can thus be a powerful tool for conceptual innovation (Glasbergen, 2011). On the other hand, the companies involved in corporate self-regulation apply wording that would leave loopholes if applied to legislation, and disregard the precautionary principle in their management of microplastic pollution. This implies that their core business traditions remain unchanged despite their publicly voiced intention to transform them to more sustainable practices. Nevertheless, closer analysis of the commitments reveals that they do not attempt to create a rhetoric which they do not intend to fulfil, but rather their rhetoric is already limited in its wording, thereby failing to fulfil adequate commitments.

Microplastic pollution cannot be addressed by one actor alone, nor by one country alone. It is a transboundary problem that requires multinational solutions and intersectoral solutions. Scientists have already put forward the idea of a plastic pollution treaty (Simon & Schulte, 2017; Raubenheimer & McIlgorm, 2017). Thus, further research could focus on the private governance of microbeads from an international perspective, investigating the role of partnerships in international campaigns and their contribution to multilateral agreements.

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Appendix

A: Interviewees

Type of data	Organisation	Person	Date
Semi-structured interviews	Plastic Soup Foundation	Jeroen Dagevos	21 June 2017
	Fauna & Flora International	Tanya Cox	03 July 2017
	Weleda	Bettina Wyciok	20 July 2017

B: Environmental Audit Committee inquiry documents

Type of data	Organisation/Person/Title	Reference	Date
Written evidence	Environment Agency	EIM0056	12 July 2016
	Water UK	EIM0055	05 July 2016
	Thames Water	EIM0051	28 June 2016
	Yorkshire Water	EIM0052	28 June 2016
	Professor Richard Thompson	EIM0053	28 June 2016
	Cornwall Plastic Pollution Coalition	EIM0054	28 June 2016
	South West Water	EIM0050	14 June 2016
	Northumbrian Water	EIM0049	08 June 2016
	Southern Water	EIM0048	08 June 2016
	United Utilities	EIM0047	08 June 2016
	Anglian Water	EIM0046	08 June 2016
	Severn Trent Water	EIM0045	08 June 2016
	Wessex Water	EIM0044	08 June 2016
	L'Oréal	EIM0043	08 June 2016
	Dr Danielle Green	EIM0040	08 June 2016
	British Plastics Federation	EIM0041	08 June 2016
	Johnson & Johnson	EIM0042	08 June 2016
	Veolia	EIM0039	25 May 2016
	British Retail Consortium	EIM0037	25 May 2016
	The Cosmetic Toiletry and Perfumery Association	EIM0038	24 May 2016
	Neils Yard Remedies	EIM0036	16 May 2016
	World Animal Protection UK	EIM0013	14 May 2016
	Novamont	EIM0035	27 April 2016
	DEFRA	EIM0034	26 April 2016
	Environmental Investigation Agency	EIM0022	24 April 2016
	Plastic Oceans	EIM0021	20 April
	Brunel University London	EIM0028	20 April
	Plymouth Marine Laboratory	EIM0008	20 April 2016
	University of Exeter	EIM0009	20 April 2016
	CHEM Trust	EIM0010	20 April 2016
	Plymouth University	EIM0011	20 April 2016

	Fidra	EIM0012	20 April 2016
	King's College London	EIM0014	20 April 2016
	British Plastics Federation	EIM0015	20 April 2016
	Fauna & Flora International	EIM0016	20 April 2016
	5 Gyres Institute	EIM0017	20 April 2016
	Royal Society of Chemistry	EIM0019	20 April 2016
	Greenpeace UK	EIM0020	20 April 2016
	CEFAS	EIM0023	20 April 2016
	Marine Conservation Society	EIM0025	20 April 2016
	Grantham Institute	EIM0027	20 April 2016
	Keep Britain Tidy	EIM0029	20 April 2016
	Richard Shirres	EIM0031	20 April 2016
	Cosmetics Europe	EIM0032	20 April 2016
	Thomas Stanton	EIM0033	20 April 2016
	Rame Peninsula Beach Care	EIM0007	20 April 2016
	Dr Natalie Welden	EIM0003	13 April 2016
	Mr Shay Fennelly	EIM0004	13 April 2016
	Dr Shaver	EIM0005	13 April 2016
Oral evidence	Evidence given by Dr Laurent Gilbert, Director for International Development of Advanced Research, L'Oréal, Ian Malcomber, Science Director, Unilever, Dr Patrick Masscheleyn, Director R&D Beauty Care and Global Product Stewardship, Procter & Gamble	HC 179	29 June 2016
	Evidence given by John Chave, Director General, Cosmetics Europe, and Dr Chris Flower, Director General, The Cosmetics, Toiletry and Perfumery Association; Professor Richard Thompson, Professor of Marine Biology, Plymouth University	HC 179	08 June 2016
	Evidence given by George Eustice MP, Minister of State for Farming, Food and the Marine Environment, Dr Gemma Harper, Deputy Director for Marine and Chief Social Scientist, DEFRA and Thomas Maes, National and International Monitoring Programmes Co-ordinator, Centre for Environment	HC 179	14 June 2016

	Fisheries and Aquaculture Science		
	Evidence given by Francisco Morcillo, Public and Industrial Affairs Manager, British Plastics Federation, Dr Laura Foster, Head of Pollution, Marine Conservation Society, Sarah Baulch, Oceans Campaigner, Environmental Investigation Agency, and Daniel Steadman, Marine Plastics Projects Manager, Fauna & Flora International.	HC 179	24 May 2016
	Evidence given by Professor Tamara Galloway, Professor of Ecotoxicology, University of Exeter, Dr Erik Van Sebille, Faculty of Natural Sciences, The Grantham Institute for Climate Change, Imperial College, Professor Frank Kelly, Professor of Environmental Health and Deputy Director of the MRC-PHE Centre for Environment and Health, King's College London	HC 179	09 May 2016
Reports	4 th Report – Environmental impact of microplastics	HC 179	24 August 2016
	5 th Special Report – Environmental impact of microplastics: Government Response to the Committee's Fourth Report of Session 2016-2017	HC 802	14 November 2016

C: Department of Environment, Food and Rural Affairs public consultation documents

Type of data	Title	Date
Reports	Proposals to ban the use of plastic microbeads in cosmetics and personal care products in the UK and call for evidence on other sources of microplastics entering the marine environment	December 2016

	Summary of responses	July 2016
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D: Interview Guide (NGOs)

1. Could you provide a brief description of your role at [organisation]?
2. What is the purpose and aim of [organisation] in general, and of the Microplastics program in particular?
3. To what extent does your organisation engage in partnerships with the private sector e.g. cosmetics industry and others? And what are the motivations for doing so? Has this engagement lead to outcomes which were meaningful for the regulatory process?
4. Have companies reached out to your organisation in order to engage in partnerships?
5. Why do you think some companies find it so difficult to eliminate microplastics?
6. Have partnerships changed your organisation's role in or influence on the regulatory process? Is there a risk of co-option of interests/processes?
7. What aspect of your microbead campaign do you think is most important – educating consumers and raising awareness; or partnering with businesses and thereby changing their practices?
8. Why is banning microbeads so important, besides pressuring companies to comply with their voluntary commitments?
9. Are there other NGOs you know of actively trying to engage in partnerships with businesses on the microbeads issue?

E: Interview Guide (Business)

1. What is your company's official position regarding microplastics?
2. As an organic cosmetics company, you are certified. Do you still get worried consumers who contact you regarding your ingredient use?
3. Why do you think other companies use microbeads?
4. Is your company engaging with stakeholders (e.g. Waste Water Treatment Plants) to research the impacts of your product ingredients?
5. Concerning the EU circular economy strategy, what is your company's position on it?
6. What kind of role should companies take in regulatory processes on sustainability issues?