
2

Consumer Advocacy in the United States and Britain

The phenomenon of consumerism has given rise to a rich and varied literature on the political development of consumer advocacy organizations in the United States.¹ Few of those works, however, systematically address the impact of political institutions and policies on the historical trajectories and political fortunes of those organizations; fewer still compare their American subject matter with organized consumer movements abroad.² This chapter aims to partially rectify this gap in the literature by comparing how governmental policies and the institutional configurations of consumer protection policymaking in the United States and Britain have influenced the strategies and political impact of their respective consumer advocacy organizations. In the process, I outline two contending institutional models of consumer policymaking—the United States’s pluralist, decentralized system and Britain’s centralized, semicorporatist system—to serve as points of comparison for my more in-depth analysis of the Japanese consumer movement.

My decision to bring the U.S. and British cases into an analysis of the Japanese consumer movement is based on the following considerations. First, all three countries have enjoyed comparable levels of economic development since the late 1960s and have faced broadly similar consumer problems, yet the strategies and impact of their respective consumer organizations are quite different. These differences, which are summarized in chapter 9, can be explained using the analytical framework described in chapter 1.

Second, although the U.S. movement differs quite markedly from the British and Japanese cases in regard to both the political and institutional context of movement activism and the movement's strategic behavior and impact on policy, it should be included in any comparative analysis of consumer advocacy if for no other reason than it has served as a model for consumer activism around the world. This is particularly true for Japanese advocates, many of whom have looked to Ralph Nader and his network of organizations for standards against which to measure their own performance. More important, singling out the contextual differences between the American and Japanese movements helps us understand the boundaries of consumer advocacy in Japan.

While the U.S. movement tends to be the outlier of the three cases, the British movement closely resembles the Japanese case in terms of its structural institutional context of movement activism. The fact that British consumer advocates tend to have more direct influence over policy than Japanese organizations do, therefore, gives us more clues to the sources of idiosyncrasies in the Japanese case. Many of those clues, I argue in later chapters, are rooted in the informal institutional practices of Japanese policy-making in particular and in political trends more generally.

The United States: A Century of Consumerism

For most Americans, the phrase *consumer movement* conjures up images of Ralph Nader and his impassioned and highly effective crusade against the excesses of business and government. Few, however, realize that the wave of consumer power that swept the political world during the 1960s and 1970s under Nader's watch was a phenomenon without precedent in American consumer history. And it is a long history, beginning at the turn of the twentieth century and punctuated by a series of political fits and starts.

The First Wave: The Turn of the Twentieth Century

Consumer advocates first appeared on the American political scene during the 1890s in the midst of rapid urbanization and a population explosion, the rise of mass production and the branding of products, the development of national markets in the wake of expanding rail links, mass advertising, and large cost-of-living increases (Herrmann and Mayer 1997:585). These

socioeconomic developments contributed to mounting concerns among urban dwellers about the safety and quality of consumer goods and, in turn, defined many of the issues that gave early consumer representatives their initial *raison d'être*.

Consumer advocates were, in many ways, products of the Progressive Movement, with its reformist and humanitarian outlook (Mayer 1989:10, 18) and tendency to look to government as the primary instigator of social and economic reform (Herrmann and Mayer 1997:585). Accordingly, many of the organs that engaged in consumer politics during this period were not consumer organizations in the strict sense of the term but, rather, organizations that embraced a broad range of social and economic issues in addition to consumer-related concerns. Many of those organizations were led by women and were particularly active at the state and local levels (Brobeck 1997:531). The more overtly “consumer” organs, meanwhile, mixed broad social reform with consumer issues in their agendas. For example, the Consumers League of New York, the country’s first consumer organ, made its mark by publicizing a “white list” of shops that provided not only quality consumer goods but also good working conditions for their staff members (Herrmann and Mayer 1997:585).

As a result of the institutional context of consumer activism, the United States’s early consumer organizations had almost no direct influence over the direction of national policymaking. In theory, the potential for congressional support for consumer issues certainly existed. The lack of a strong tradition of party discipline in both houses of Congress, for example, meant that legislators could champion consumer and other public-interest issues with relative political impunity. In practice, however, the likelihood that long-term advocates of the consumer interest would emerge in the legislative branch of government was weakened by the predominance of business-related interests in the polity.

The legislative record shows how preoccupied lawmakers were with the affairs of industry. Since the vast majority of regulatory measures introduced at this time were designed to promote efficient commerce rather than consumer protection, benefits bestowed on consumers as a result of those measures were either incidental or of secondary concern to legislators (Mayer 1989:11). The expansion of consumer choice as a result of antitrust policies designed to regulate industry is the best example of this tendency.

The informal alliance between government and business was reinforced by a deep-seated distrust of expanding governmental regulation in anybody’s interest, let alone the consumer’s. The business lobby and its allies among

southern Democrats were particularly vocal in this regard (Herrmann and Mayer 1997:586). Not surprisingly, these sentiments often translated into vehement opposition to consumer protection proposals that threatened to restrict industry's economic freedom.

For consumer advocates, the upshot of these informal political alignments and the basic policy orientations of Congress was not only a paucity of close consumer allies in the policymaking system—a key resource for citizen groups seeking to influence policy—but also a distinct unlikelihood that consumer lobbying would have a direct impact on legislative developments. It is largely for these reasons that consumer organizations resorted to boycotts and nonviolent forms of protest to express their political views while looking outside the mainstream political system for support.

Among the more important allies of the organized movement were the muckraking journalists who were themselves both cause and reflection of the Progressive Movement. Many of these journalists featured consumer reform as part of their crusade against governmental corruption and shady business practices. The *Ladies Home Journal* and *Colliers*, for example, were zealous proponents of food and drug safety (Nadel 1971:13). Media attention to consumer issues lent an air of legitimacy to two of the early organized movement's most prominent objectives: the introduction of governmental regulation to enhance the safety of basic consumer products and the development of a "consumer consciousness" in the public at large.

Although consumer organizations achieved few of their regulatory objectives before World War I, they did manage to raise the awareness of ordinary citizens about their identities as consumers—so much so, in fact, that Walter Lippmann felt compelled to remark that the consumer consciousness had begun to outpace the class consciousness of labor (Herrmann and Mayer 1997:586). The development of a nascent consumer identity did not, however, translate into mass support for consumer organizations; nor, for that matter, was it matched by a commensurate level of legislative support for regulation in the consumer interest.

How, then, do we explain the consumer protection measures introduced at this time?

The passage of the Meat Inspection Act and the Pure Food and Drug Act in 1906 offers some clues. Starting in 1892, consumer organizations diligently lobbied both Congress and the White House for passage of a pure food act but were continually defeated by a loose legislative coalition led by southern Democrats and supported by business groups (Herrmann and

Mayer 1997:586). Then the tide quickly turned in favor of the bill's supporters following the publication in 1906 of Upton Sinclair's best-selling book *The Jungle*. A shocking account of the unsanitary conditions of Chicago's meatpacking industry, the book caused an immediate public sensation and prompted President Theodore Roosevelt to throw his support behind a meat inspection bill (Nadel 1971:11). The Pure Food and Drug Act was passed shortly thereafter by an overwhelming majority of both houses.

Put simply, consumer protection legislation was the product of eleventh-hour presidential backing in response to scandal and public outrage (Herrmann 1974:12). Presidents have every incentive to respond to such outbursts because they are elected at large; to ignore public opinion in such circumstances, in other words, is to invite a loss of support at the polls. Consumer organizations and their media allies played a supporting role in the immediate denouement of legislative events by publicly endorsing these last-minute presidential initiatives and the legislators who eventually transformed them into law. Perhaps more significantly, consumer advocates had a longer-term and more indirect impact on the policy process by influencing public opinion. In the case of the Meat Inspection Act and the Pure Food and Drug Act, advocates helped shape the very public sentiments that ultimately persuaded the president to take action in 1906.

As witness to the country's first consumer organizations and the development of a nascent consumer consciousness, the period spanning the final years of the nineteenth century and the first two decades of the twentieth was without a doubt a formative moment in the development of the American consumer movement. That said, the United States at this time was by no means a consumer-oriented polity. As a result of the pro-business policies and political alignments of key policymaking actors, the few governmental consumer protection measures that were introduced during this period were the result not so much of routine policymaking in the so-called consumer interest than of legislative accident or, more rarely, of last-minute presidential responses to public backlashes against the egregious abuses of the health and safety of consumers.

The Second Wave: The 1930s

Consumer activism experienced a lengthy lull as a result of World War I, the decline of the Progressive Movement, and the "business dominated spirit

of the 1920s" (Nadel 1971:16). By the 1930s, however, prevailing socioeconomic conditions made the movement appear ripe for a revival. In addition to the myriad socioeconomic crises normally associated with the Great Depression, American citizens faced a proliferation of consumer problems resulting from the expansion of mass production and mass advertising. The country was also in the midst of adapting to electricity and the diffusion of electrical appliances (Mayer 1989:19), products that were prime targets for proponents of enhanced consumer safety.

Some consumer activists responded to these economic developments by publishing a spate of new antibusiness exposés that strengthened the country's burgeoning consumer consciousness. Among those exposés was *100,000,000 Guinea Pigs: Dangers in Everyday Foods, Drugs, and Cosmetics*, a best-selling book by Arthur Kallet and F. J. Schlink that described the subjection of unwitting consumers to untested and potentially dangerous products and pointed out the weaknesses of the Pure Food and Drug Act.³ Schlink later helped establish a consumer organization that in 1936 evolved into Consumers Union (CU). CU, which publishes *Consumer Reports*, is today regarded as the country's leading product-testing organization and one of its most influential consumer advocacy organs.

While a deepening consumer consciousness and the establishment of Consumers Union are reasons enough to designate the 1930s as a second formative moment in the movement's history, the lack of meaningful access to the policy process prevented consumer representatives from exercising the kind of policy influence that one might expect during periods of economic distress. The fate of the Consumer Advisory Board of the National Recovery Administration (NRA) is a case in point. While consumer organizations hailed the board as the first formal access point for consumer representatives into the federal bureaucracy, movement efforts to have the consumer interest embodied in NRA policy were often rebuffed as board members focused on reinvigorating business (Mayer 1989:23) in response to the policy priorities of the Roosevelt administration. Consumers, in other words, had representation at the national level but, as a result of the policy priorities and informal institutional practices of the 1930s, virtually no voice.

The inability of consumer organizations to gain meaningful inroads into the corridors of policy formulation and implementation was reinforced by a growing distrust in governmental circles of radical political tendencies in the general population. By the end of the decade, many consumer advocates had been put on the political defensive following investigations of Consumers Union by the House Committee on Un-American Activities for alleged

communist activities. Although the charges proved groundless, the incident led to a decline in CU membership (Herrmann and Mayer 1997:588) that was not reversed until well after World War II.

In keeping with both historical precedent and consumer representatives' limited inroads into the policy process, pro-consumer laws introduced during the 1930s were once again the product of scandal and last-minute executive sponsorship, as opposed to congressional initiatives supported by consumer lobbying. The long-anticipated overhaul of the 1906 Pure Food and Drug Act in 1938, for example, was the handiwork of Rexford G. Tugwell, the assistant secretary of agriculture (Nadel 1971:16), and occurred only after the tragic deaths in 1937 of more than 100 consumers of a tainted medicinal drink (Herrmann 1974:18). Clearly, the era of New Deal politics did not include a new deal for the organized consumer movement. Now, as before, consumer advocates operated from the sidelines of interest articulation.

The Third Wave: The 1960s and Early 1970s

After a long period of dormancy triggered by World War II, the political fortunes of the organized consumer movement changed dramatically during the 1960s (Nadel 1971:3). In accordance with historical precedent, the third wave reflected problems inherent in the act of consumption, this time caused by rapid economic growth and the proliferation of new product lines, the expanded use of credit, and the globalization of production (Mayer 1989:13). Moreover, as Americans became more affluent, they grew less tolerant not only of the problems plaguing them as the consumers of goods and services but also of governmental graft and the widening power imbalance between themselves and the country's flourishing business community. To some scholars, the frustrated expectations of American consumers were the source of the movement's coming of age during the 1960s (Finch 1985:25). If the history of the American movement is any indication, however, we can safely assume that socioeconomic grievances will not result in politically powerful consumer organizations if policy and institutional opportunities for consumer activism are not in place. What made the 1960s and early 1970s significant for the American movement was the appearance of precisely those kinds of opportunities.

It all started in 1962 when President John F. Kennedy delivered the country's first consumer message to Congress. In that statement, Kennedy identified the need for greater government involvement in consumer protection

and outlined four basic consumer rights that were to define the parameters of that involvement: the rights to safe products, to consumer-related information, to a range of product choice at competitive prices, and to be heard by both industry and government. By the late 1960s, the list was expanded to include the right to redress for damages caused by defective products and unfair business practices.

Kennedy's commitment to consumer protection made good political sense because it required little budgetary outlay and yet appealed to the electorate at large at a time of rising "public expectations about the capacity of government to improve the quality of life in American society" (D. Vogel 1989:40). Recognizing the political benefits of toeing the consumer line, Kennedy's successors—including Richard Nixon—followed his lead by delivering their own consumer messages to Congress and sponsoring consumer-related legislation.

In a classic example of the impact of policy change on institutional configurations, the elevation of consumer protection on the presidential agenda was quickly followed by the introduction or expansion of executive institutions that were responsible for formulating and executing consumer policy. Kennedy, for example, established the Consumer Advisory Council as an adjunct of the prestigious Council of Economic Advisors. The advisory council served as an intrabureaucratic representative of consumer issues and an adviser to the president (Nadel 1971:51). Similar offices were maintained by subsequent presidents throughout the 1960s and 1970s, although their influence was curtailed during the Republican administrations of Nixon and Ford. Institutional developments elsewhere in the bureaucracy included the establishment in 1973 of the Consumer Product Safety Commission (CPSC), an independent regulatory agency responsible for implementing a wide range of consumer protection statutes (Fise 1997:164), and the expansion of the regulatory powers of the Federal Trade Commission (FTC) and the Food and Drug Administration (FDA).

The policy and institutional changes of the 1960s are particularly remarkable when measured against past trends. As we noted earlier, business and southern Democrats at the turn of the century were loath to sanction the growth of governmental regulatory controls in both areas pertaining to consumer affairs and in the economy more generally. By the 1930s, President Franklin Roosevelt's New Deal policies had enlarged the regulatory role of governmental officials in the economic realm, but that role did not encompass consumer protection to a significant degree. The policies of the Kennedy administration, by contrast, marked the beginning of a new wave of govern-

mental expansion—of a paradigmatic shift, in other words, toward a more public-interest approach to consumer protection that legitimized direct governmental interference in the affairs of business on behalf of consumers.

Members of Congress also jumped on the consumer bandwagon during the 1960s in response to both the reorientation of governmental consumer policy and institutional changes in Congress that were taking place independently of executive initiatives. In the Senate, for example, the decentralization of decision making, the enhanced powers of junior members, increases in the size and influence of committees and subcommittees, and the Democratic landslide of 1964 injected a heavy dose of youth and liberalism into the chamber (D. Vogel 1989:40) and increased the propensity of entrepreneurial politicians (Wilson 1980a:370)⁴ to support new public-interest issues. For many politicians—particularly Democrats—consumer protection was quickly identified as one such issue (see Mayer 1988:89, 1989:32; Nadel 1971:111–12).

The story of Senator Warren Magnuson's (D-Wash.) conversion to the consumer fold is a telling illustration of this trend. During the 1940s, Magnuson had made a mark for himself as a political spokesman of Boeing Aircraft, one of the largest employers in his home state. After almost losing the 1962 election, Magnuson swung his support behind a number of consumer protection bills and assumed the chairmanship of the Senate Subcommittee on the Consumer in an effort to broaden his political support base. The senator was rewarded for his actions by a landslide victory in 1968.

Warren Magnuson's congressional career attests to the impact of broad policy shifts and institutional change in the United States on the willingness of individual politicians to develop consumer-friendly platforms. These contextual developments in turn had a profound effect on the resource configurations of private consumer advocates. For the first time in the movement's history, advocates now had a number of powerful sympathizers and allies in the corridors of national power who were both willing and able to trumpet the consumer cause. The United States is unusual in this regard, for as we observed in chapter 1, organized consumer movements normally have trouble forging alliances with policymakers. It is important to remember, however, that the movement's advances were attributable not so much to the power and savvy of movement advocates as to policy trends and the institutional configurations of the broader political system.

By the mid-1960s, presidential policy initiatives, the expansion of the consumer-related functions of bureaucratic organs, and the decentralization

of power and concomitant rise of consumer movement allies in Congress had led to the enactment of a number of laws that marked the birth of a comprehensive consumer protection policy regime.⁵ Like social movement organizations more generally, American consumer advocates did not instigate these institutional changes, nor did they play a defining role during the initial upsurge in legislative activity. These institutional and legislative developments did, however, encourage consumer organizations to expand their lobbying networks in support of further reform. After years of focusing almost exclusively on product testing, for example, Consumers Union ventured into advocacy politics during the 1960s by establishing offices in Washington, D.C. The era also witnessed the formation of the Consumer Federation of America (CFA), an umbrella group of 200 national and state organizations (Mayer 1989:43) responsible for coordinating consumer lobbying activities and organizing the annual national consumer conference known as the Consumer Assembly.

The most widely recognized organizational development in the American consumer movement at this time was, of course, the appearance of Ralph Nader and his network of advocacy groups. Nader's first foray into the public's consciousness came in 1965 as the author of *Unsafe at Any Speed*, an exposé of General Motors' shoddy manufacturing standards. The following year, as Nader was testifying before Congress for highway and automobile safety legislation, the *New York Times* revealed that Nader's private life had been the target of an investigation by GM. Almost overnight, *Unsafe at Any Speed* became a best-seller and Nader a household word. The publicity surrounding the scandal not only led to a strengthening of the original provisions of what in 1966 became the National Traffic and Motor Vehicle Safety Act, but it also raised the public's awareness of consumer issues and of efforts by the organized movement to pressure the government to do more for consumers (Nadel 1971:141). Nader cashed in on his newfound fame and the expansion of institutional opportunities for political action by establishing his network of organizations and, in the process, paving the way for a flood of highly skilled public-interest lawyers—one of the U.S. movement's most valuable resources—to play a leading role among consumer advocates. In a year or two, Nader and his band of Raiders had transformed the mission of consumer protection in America into a veritable crusade.

Despite the numerous institutional inroads into the policy process that were opening to the organized consumer movement, the consumer crusade was not an easy one for private advocates. Like consumer organizations

everywhere, Nader's consumer network and other key consumer organs never had as many of the resources required for effective lobbying campaigns as did their wealthy opponents in the business community. To compensate for this weakness, many organizations allied with activists in the labor movement. Ties between labor—including the AFL-CIO—and the consumer movement are consequently quite close; unions, for example, participate actively in the Consumer Federation of America and offer many consumer organizations financial support and manpower (Herrmann and Mayer 1997:599).

Consumer advocates also used the courts to enhance their leverage in the policy process. In many cases, judges proved amenable to the consumer cause as a result of several policy-related changes that had been taking place in the court system during the 1960s: the expansion of the doctrine of standing, the strengthening of the courts' willingness to overturn regulatory agency decisions, and the recognition of the right of private citizens to participate in the decisions of administrative agencies (D. Vogel 1989:108). Throughout the late 1960s and 1970s, highly publicized consumer lawsuits—particularly class action suits and those filed under administrative procedure rules—helped shape consumer protection policy by convincing both the general public and bureaucratic officials of the need for reform (Berry 1977:289) while simultaneously making firms more sensitive to consumers' needs (Schweig 1980:200).

When all is said and done, consumer advocates would have made few if any advances in the policy process during the 1960s and early 1970s had it not been for the lack of concerted opposition from the business community. Business had been caught unawares by the sudden and unprecedented upsurge in pro-consumer legislation, and, as a result, was slow to respond (D. Vogel 1989). At the root of the problem was the fact that the business community was poorly organized at this time and bereft of the strong, institutionalized ties with policymakers needed to fend off the consumer attack. Indeed, one could make the case that there was no pressing need for business to be otherwise; this was, after all, an era of economic expansion from which all interests could benefit. It was not until after the 1973 oil shock, when the country entered a period of prolonged economic recession, that business representatives and their political allies were able to organize an effective counterattack against consumerism and its costly economic side effects. Until then, advocates had both the institutional and ideological space in which to press for the fulfillment of their public-interest goals.

Consumer Strategies and Policymaking Roles

When compared with business organizations, the AFL-CIO, or even the National Rifle Association, American consumer organizations have had a relatively weak impact on policy. As we noted in chapter 1, this should come as no surprise given the difficulties confronted by consumer advocates when mobilizing both resources and a highly diffuse consumer constituency. But when we compare the record of American consumer organizations during the 1960s and early 1970s with that of their counterparts abroad, their ability to influence the agenda-setting and policy-formulation processes and to blow the whistle on governmental incompetence looks quite impressive. The key to those successes has been the institutional structure of the American policy-making system.

The impact of consumer advocates on agenda setting and policy formulation was made possible by unprecedented presidential initiatives in the consumer realm and the establishment of informal relationships with pro-consumer congressional entrepreneurs who appeared after the decentralization of Congress. These developments facilitated Nader's efforts to raise the issue of automobile and highway safety in Congress, for example, and to influence the content of corresponding legislation. Access to the courts and to sympathetic officials in the bureaucracy, moreover, enabled advocates to expose graft, administrative errors, and undemocratic procedures in the public sphere.

That consumer advocates managed to achieve a fair number of policy objectives during the 1960s and 1970s is testament to the effectiveness of a finely tuned strategy of persuasion⁶ that included the dissemination of product-testing results, the publication of carefully researched books and articles, and effective lobbying and litigation techniques. Together, these tactics influenced policymakers both directly and indirectly through the formation or activation of public opinion. On many occasions, for example, consumer publications and lawsuits helped turn vague consumer problems into contentious political issues (Mayer 1988:87), which in turn raised public expectations for commensurate solutions at the policymaking level.

As resource mobilization theorists argue, the overall effectiveness of consumer movement strategies in the policymaking process is contingent on access to capital, strategically placed allies, media attention, policy-related information, and intramovement expertise. During the heyday of consumer activism, advocates may not have been as well endowed as wealthy business lobbyists, but they were much better off than their counterparts in many

other advanced industrial democracies. Governmental tax exemptions for donors to nonprofit organizations, proceeds from the sales of publications like *Consumer Reports*,⁷ and, less frequently, foundation and government grants⁸ generated enough money for the country's main consumer organizations to sustain their research programs and lobbying campaigns. As for strategically placed allies, consumer organizations, as we have already noted, had a fair number of supporters in Congress, the White House, and the regulatory agencies, many of whom also served as important sources of insider information about the policy process. Consumer representatives also enjoyed an enduring and productive relationship with the media that continues to this day, a relationship that is undoubtedly one of the most important prerequisites for getting the consumer message to the public (interview, James, May 1999). Finally, the movement's access to expertise was, and continues to be, more than adequate. Although most consumer organizations continually struggle with the problem of personnel shortages, many are staffed by individuals who are highly trained in the law, economics, and even the natural sciences. The remarkably high level of expertise in the organized movement is itself a reflection of the relative openness of both national and state governmental institutions to pressure from citizen advocates. Had such institutional opportunities not existed, talented professionals would have had few incentives to devote their careers to advancing the consumer cause.

In sum, consumer advocacy organizations during the 1960s and 1970s had sufficient inroads into the policy process and access to key resources to adapt to that process in an assimilative manner, pursuing tactics based on rational persuasion, rather than street demonstrations, emotive appeals to the public, and other forms of traditional protest. In this way, consumer organizations behaved much like mainstream interest groups rather than mass-based social movement organizations. This is not to suggest, however, that advocates routinely cooperated with the "enemy"; to the contrary, they took pains to preserve their political independence and to avoid co-optation by either business groups or the state. They sought, in other words, to be "in" the system, not "of" it.

Recent Trends

By the mid-1970s, consumer advocates could claim victory on a number of fronts: products were now safer than ever before; consumer fraud was on

the decline; and both industry and government were much more attentive to the voices of consumers. But the political fortunes of consumer organizations had begun to change by this time in response to a confluence of developments: the economic slowdown of the post-oil shock period, the reorganization of business interests at the national level, the dissemination of new ideas about consumer protection in the policymaking realm, and the devolution of powers from the federal government to the states.

As economic growth slowed after the mid-1970s, an increasing number of scholars, policymakers, and business representatives called for the state's retreat from the affairs of private business as a way to jump-start growth rates. Although consumer protection was far from the forefront of this neoliberal rethink, proponents justified regulatory reform to consumers on the grounds that it would lead to lower prices, more technological innovation in the marketplace, and, consequently, a greater range of product choice. This free-market approach to consumption was reminiscent of the first two waves of consumer movement history when the consumer interest was addressed via the beneficial but nevertheless incidental side effects of pro-business, market-oriented policies. By the Reagan administration—a “cruel time,” in Nader's words (*New York Times*, May 10, 1989)—the approach had once again placed consumer representatives on the political defensive.

The consumer retreat was fueled not only by shifting governmental policies and ideas about consumer protection but also by the mobilization of firms in response to the regulatory gains of the public-interest movement (*New York Times*, May 10, 1989). A few of those firms established rival “public-interest” organizations of their own to disseminate the new neoliberal creed and to discredit the accomplishments and reputations of Nader and other consumer advocates (*New York Times*, April 22, 1982).⁹ Others simply intensified their lobbying efforts for deregulation. In response to these policy and political realignments, the budgets and consumer-related responsibilities of regulatory agencies like the Federal Trade Commission shrank (*New York Times*, May 26, 1981); the role of the president's consumer adviser was scaled back; and the balance of power in Congress shifted toward the proponents of regulatory reform. For consumer representatives, the net effect of these developments was a decline in the number of institutional opportunities to disseminate their ideas and influence the policy process.

As the number of institutional opportunities for consumer activism at the national level decreased, so, too, did the political and economic resources at the disposal of representative organizations: the number of potential allies

in Congress dwindled; the flow of public-interest lawyers into consumer organizations slowed; and access to government grants narrowed (interview, James, May 1999). Not surprisingly, the ability of consumer organizations to achieve their policy-related goals decreased accordingly. From the late 1970s, when long-term movement efforts to establish a national consumer agency were roundly defeated in Congress,¹⁰ through the 1980s, the rate of introduction of new consumer protection legislation fell dramatically.

Consumer organizations may have suffered an overall decline in their capacity to influence the content of national public policy following the resurgence of business and the narrowing of access points into the policy process, but they certainly did not disappear. In fact, some consumer organizations continued to exert limited influence over both public opinion and the national agenda-setting and policy implementation processes—a feat that speaks volumes about the success of the organized movement's past policy gains, its organizational flexibility, and its ability to expand the conceptual boundaries of consumer activism.

On the issue of regulatory reform, for instance, Nader's well-publicized "populist critique" (Derthick and Quirk 1985:41) of national regulatory agencies (D. Vogel 1980/81:609) encouraged governmental actors to reform the system. As early as the Nixon administration, for instance, a well-publicized Nader exposé led to the wholesale overhaul of the Federal Trade Commission. Selective movement support for the government's deregulatory proposals also had an influential impact on public opinion. Advocates worked hard, for example, to strengthen public support for airline, telephone, and banking deregulation, although many later criticized some of the specifics of deregulation on the grounds that they led to higher prices for low-income consumers (Brobeck 1991). Finally, although Nader's network, in alliance with labor unions, ultimately failed to prevent the passage of the North American Free Trade Agreement,¹¹ it was instrumental in raising public awareness of the social and environmental costs of economic globalization and in placing the domestic and international ramifications of free-trade agreements on the national political agenda (D. Vogel 1980/81:1; interview, James, May 1999).

The continuing impact of consumer organizations on public opinion has been facilitated by the expansion of opportunities for consumer activism at the subnational level. Both state and local governments have been involved in consumer protection since the late nineteenth century, but it was not until the 1960s and 1970s that their consumer-oriented roles expanded with the establishment of state consumer affairs offices (Gregg 1997:527) and, by

the end of the 1970s, the rapid expansion of the consumer-related responsibilities of state attorneys general (Blanke 1997:538; *New York Times*, February 8, 1988). These trends continued into the 1990s as numerous states established independent councils or agencies to represent the legal and economic interests of consumers before bureaucratic commissions overseeing utilities, insurance, health care, and other consumer-oriented programs (Gregg 1997:531). In these and other cases, institutional innovations at the state level were facilitated by interstate cooperation through such organizations as the National Association of Consumer Agency Administrators and the National Association of Attorneys General (Gregg 1997:531).

Institutional developments at the subnational level led to some interesting changes in the organized movement as it sought new inroads into the policy process and closer contacts with the citizenry during the era of regulatory reform. Consumers Union, for example, established regional chapters in Texas and California during the late 1970s. Together with other organizations at the state level, these chapters have indirectly influenced national policy on such issues as insurance and health care by helping set consumer precedents at the state and local levels via the courts and legislative assemblies (interview, James, May 1999). Ralph Nader, meanwhile, poured his energies into the expansion of his state and local consumer networks.¹² Although the diffuseness of the consumer constituency and the relative weakness of consumer grievances will undoubtedly prevent the American consumer movement from becoming a truly mass movement, the aim of Nader and other advocates has been to inject a stronger grassroots element into the overall movement (*New York Times*, April 27, 1982) now that the level of direct consumer access into the national policy process has diminished. The strategies of these organizations, meanwhile, appear to have remained more or less the same. What is distinctive about consumerism after the late 1970s is the fact that the number of governmental targets of movement strategies has expanded.

As consumer organizations responded to institutional shifts in the national policymaking system, many of their policy priorities changed as well. Now that consumer organizations are more firmly entrenched in the nation's cities, for example, they are more in tune with the problems of elderly and low-income consumers (interview, James, May 1999), whereas in the past they were mainly spokespersons for the middle class. Furthermore, as consumer organizations try to extend their appeal to a broader cross section of the population, more and more are addressing such issues as good governance, environmentalism, health care, taxation, and other issues that thirty

years ago were only minor points on the consumer agenda (see Kroll and Stampfl 1981). Clearly, the concept of “consumer” has been taking on more and more attributes of “citizenship” as the movement adjusts to the changing institutional opportunities of consumer activism at the turn of the new century.

British Consumerism

The politics of postwar consumerism in Britain raise some intriguing questions for students of comparative consumer movements. Between 1875, when the country’s first food and drug act was enacted, and the early 1990s, Britain introduced more consumer protection laws than did the United States (M. J. Smith 1993b:201). At the same time, however, Britain’s network of consumer advocacy organizations has not been nearly so politicized as the American consumer movement; nor does it enjoy comparable levels of influence over the national policy process. Where, then, do these laws come from? Are governmental policymakers simply more pro-consumer than their American counterparts, thereby negating the need for a more active consumer movement?

Institutional factors hold the answers to these questions. While American consumer organizations have been characterized by a high degree of organizational independence in relatively pluralist and adversarial interest-group and policymaking settings, Britain’s leading advocacy organizations have cooperated with governmental and business actors in a semicorporatist institutional setting based in the national bureaucracy. The ramifications of these institutional arrangements for the politics of consumer protection policymaking in Britain are at least twofold. First, since leading consumer advocates are not only “in” the system but also “of” it, they have fewer incentives to build a more politicized network of private consumer organizations, or, for that matter, to adopt aggressive lobbying tactics. Second, while British policymakers are not necessarily any more enlightened than their American counterparts, they do have strong institutional incentives to encourage compromise between consumer and business actors and to formulate policies that accommodate the interests of both. The result is a body of consumer protection law that, while extensive, is far softer on business than are comparable American statutes.

The following is a brief overview of these institutional arrangements and their impact on the historical development, political strategies, and policy-related influence of British consumer advocacy organizations.

The Institutional Backdrop

Although the British consumer movement can trace its roots to the early nineteenth century, when the consumer cooperative movement was first launched,¹³ routinized consumer participation in national policymaking processes is widely regarded as a postwar phenomenon (see Hornsby-Smith 1986; J. Mitchell 1997). As in the United States, the politics of consumer participation in these processes are conditioned by formal and informal institutional opportunities for the representation of the public interest by various actors in the political system. Unlike the United States, however, those opportunities are relatively narrow in scope. Although party competition has encouraged virtually all parties to incorporate consumer issues into their political platforms, for example, the potential for the British Parliament to give rise to political entrepreneurs who distinguish themselves by their commitment to consumer policy is curbed by such informal institutional features as party discipline and centralized decision making, particularly in the powerful House of Commons. Furthermore, the prime minister, who is chosen from among members of Parliament rather than elected directly by the public at large, like the American president, has fewer incentives to espouse broad consumer interests as part of his or her political platform. Finally, the courts have not developed into a powerful alternative avenue for the articulation of the public interest. For years, lawsuits were harder to launch and much more costly than in the United States, and onerous procedural barriers discouraged plaintiffs from bringing cases to completion (Smith and Swann 1979:150–51). By the mid-1970s, however, this began to change as measures were introduced to simplify and reduce the costs of small-claims cases at the county court level (Wraith 1976:51–52). Consumer access to the courts expanded further during the 1980s and 1990s as more and more British lawyers accepted cases on a contingency basis (O'Connor 1998:67–68). These changes notwithstanding, the British courts are still much more costly and complex than their American counterparts and hence harder for consumers to access.

With regard to the processes of policy implementation, moreover, consumer representatives or private citizens have fewer opportunities to alter or reverse bureaucratic decisions. This is particularly true for regulatory policy. In the United States, agency procedures hold regulators publicly accountable for their actions, while a decentralized judicial system enables private citizens to contest individual regulatory decisions. The same cannot be said

of Britain, however, where decision making is more centralized and discretionary and private citizens still face considerable legal barriers in the court system when seeking retribution for damages caused by, say, antitrust enforcement (Swann 1989:7). British consumers do have access to administrative redress via the Parliamentary Commissioner for Administration, a kind of ombudsman established in 1967 for citizens whose interests have been harmed by executive actions, but its effectiveness as spokesperson for consumers is weakened by the fact that it must deal with a wide range of non-consumer issues as well.

In keeping with trends in many other policymaking fora (see Jordan and Richardson 1982:81), consumer protection policymaking throughout much of the postwar era has been carried out in an informal institutional context of “bureaucratic accommodation” and consensus building. Centered in the bureaucracy, the process involves consultation and negotiation with concerned groups linked to the government in subunits resembling policy communities (Jordan and Richardson 1982). Consumer organizations have assumed a fairly well-defined place in these subunits, performing in them the twin functions of setting agendas and providing decision makers with specialized information about consumer-related issues.

The Advocates: Public and Private . . .

The most influential consumer advocacy organs in this policymaking configuration have been the National Consumer Council (NCC) and the Consumers’ Association (CA). Formed by the Labour government in 1975, the NCC is a publicly funded,¹⁴ nonstatutory body (Hornsby-Smith 1986:292) with a wide-ranging mandate to conduct research on consumer-related issues and to represent the interests of consumers in the bureaucracy, Parliament, and, in the past, nationalized industries (G. Smith 1982:272). While the NCC resembles consumer agencies at the state level, there is nothing like this organ at the national level in the United States aside from the presidential consumer adviser, who performs far more limited functions and is backed by a much smaller staff.

The NCC’s position as official spokesperson for the consumer interest has often been criticized because the council is not a mass-membership organization (Cullum 1997; J. Mitchell 1997:577). One might also argue that it runs the risk of being captured by governmental actors, industry, or the

political parties, given its close association with government. In practice, however, there is no compelling evidence that the NCC is controlled by any of these actors (J. Mitchell 1997:577; M. Smith 1991:125); to the contrary, some analysts regard the council as a “genuine public-interest organization” and applaud its political neutrality (M. Smith 1991:125). That said, the NCC’s close and institutionalized ties with the government do encourage cooperative relations with other interests—even business groups. For example, the NCC forms alliances with the major parties and business groups to support specific policy proposals. Although American organizations have allied with other interests like labor unions and environmental groups on certain issues—particularly during the past two decades in response to their relative political decline—alliances with business groups have been rare.

The NCC has never approximated the policy-related influence of American consumer organizations during the 1960s and early 1970s. In accordance with the informal institutional custom of bureaucratic accommodation, this is largely attributable to the comparatively close ties between business groups and the government and the resulting influence of business interests over policy. Consequently, NCC policy proposals are often defeated or watered down in response to business demands, and consumer policy in general tends to be much more solicitous of business interests than is comparable policy in the United States.

By the same token, since the mid-1970s the NCC has helped secure important protections for British consumers because of the quality of the information it provides, information that is well regarded by both civil servants and politicians (M. Smith 1991:124). In this respect, the NCC’s ability to persuade other policymakers of the need for stronger consumer protection measures resembles that of many American consumer organizations. What distinguishes the NCC from American organizations is the fact that persuasion is carried out from a highly institutionalized position *within* the centralized policy process.

As noted earlier, the institutionalized relationship between the NCC and the government has had ramifications for consumerism as a politicized movement, for by establishing an effective body within the purview of the policymaking system that is mandated to speak out on consumers’ behalf, the government has in effect weakened incentives for the further mobilization of private advocacy groups (M. J. Smith 1993b:204). It has also weakened the inclination of other consumer organizations to adopt the aggressive political tactics of many American organizations. This is not to suggest that there are no Nader-like organizations in Britain; indeed, a few of them do

exist, particularly for specific issue areas (G. Smith 1982:291). They are, however, an exception to the norm.

If any one private organization epitomizes the “British norm” of consumer activism, it is the Consumers’ Association. Since 1957, when it was established with the financial help of the Consumers Union in the United States, the CA has addressed the problems of middle-class consumers (Hornsby-Smith 1986:304) by adopting the model of consumerism perfected by its American mentor. For example, it launched *Which?* the British equivalent of *Consumer Reports*, a magazine that provides members¹⁵ with product-related information generated by its in-house product-testing facilities. In the first week of its existence, *Which?* attracted more than 10,000 members to the CA (J. Mitchell 1997:595),¹⁶ a telling illustration of the public’s need for up-to-date information in the new consumer culture. By the 1960s, the CA had replaced consumer cooperatives as the leading nongovernmental spokesperson for the consumer interest.

Like Consumers Union, the CA focuses on product testing and the provision of information to its members and employs full-time advocates who lobby government for specific consumer protection policies. Proceeds from *Which?* and affiliated publications, moreover, have given the organization a healthy resource base that in 1994 totaled roughly \$60 million (*The Economist*, June 18, 1994:62).¹⁷ It is here that the similarities end. Whereas Consumers Union has maintained a careful organizational distance among itself, the federal government, and business interests, the CA tends to take assimilative politics to new heights by linking arms with the NCC in cooperative relationships with such actors. The CA has even supplied personnel to both the NCC and the Office of Fair Trading (Hornsby-Smith 1986:304), Britain’s equivalent of the Federal Trade Commission and one of the few bureaucratic organs with a consumer affairs division. By the 1980s, the CA had become such a fixture in the political establishment that it was no longer seen as a serious threat by business. In the words of one analyst, “The CA is now as much a part of the conformist British scene as the House of Lords, tea, and the test match” (G. Smith 1982:290).

Finally, a note about consumer-related activities at the local level. Although local governments are not as involved in consumer protection as the American states are—a reflection of Britain’s unitary system of government, which grants the localities little more than the power to execute national policies—consumer activity at the local level did increase during the 1960s and 1970s, when the number of local consumer groups reached a postwar high of about fifty (J. Mitchell 1997:578).¹⁸ It was during this time that local

governments introduced some interesting consumer-related institutions, the most important of which were the nonstatutory Consumer Advice Councils, which offered local consumers advice and, in some cases, conciliation and arbitration services (G. Smith 1982:280). Operated by staff members trained by the CA, the Consumer Advice Councils served as pivots for close working relations among the CA, local consumer groups, and local governments (G. Smith 1982:280).

. . . And Their Roles in the Policymaking System

Like American organizations, the impact of British organizations on policy depends on their ability to persuade policymakers that stricter consumer protection measures are in everyone's best interest. Unlike American organizations, however, their "strategies of persuasion" put far more emphasis on the routine dissemination of information in government circles than on the publication of scathing exposés, litigation, and aggressive lobbying, a strategy that reflects their limited but entrenched position in the policymaking system.

The institutional space occupied by consumer advocacy organizations and the resulting emphasis on strategies of rational persuasion enable those organizations to perform the following functions in the policymaking system. First, because of the NCC's mandate to represent the consumer interest in both Parliament and throughout the bureaucracy, both the NCC and, to a lesser extent, the CA, perform important consultation services for other actors in the policy process. The quality of such services in turn positions the two organizations to influence the processes of agenda setting and policy formulation, although these functions should not be overestimated, given the power of countervailing business interests in the decision-making process. Both functions are carried out in a centralized and consensus-oriented political system that encourages consumer organizations to balance the consumer interest against other contending interests in society. As we noted earlier, the result is consumer policy that fulfills many consumer protection objectives but that is often much softer on business than is corresponding policy in the United States.

What, then, is the role of public opinion in the British consumer policy process? Like consumer organizations in the United States and elsewhere, British organizations try to enhance their policymaking influence by conditioning public opinion about consumer issues. The NCC and the CA do

this by publishing high-quality reports, books, and consumer magazines and by cooperating closely with the media on an issue-by-issue basis.¹⁹ Although the activation or manipulation of public opinion can be a significant—albeit indirect—determinant of the willingness of policymakers to strengthen national consumer protection policies, it is not as important a political strategy as it is in the United States, since key consumer advocates are already so firmly entrenched in governmental circles.

Over the years, the NCC and the CA have been recognized as influential forces behind the introduction of a number of consumer statutes. During the 1960s and early 1970s, for example, these organizations helped with the implementation of incomes and pricing policies²⁰ by taking part in efficiency audits of specific industries and submitting suggestions for investigations to the National Board for Prices and Incomes (G. Smith 1982:15–17). They also contributed to the introduction of toy and electrical safety regulations, the enactment of the Unsolicited Goods and Services Act of 1971, and the Unfair Contract Terms Act of 1977 (G. Smith 1982:288; J. Mitchell 1997:576), the partial lifting of controls on retail shopping hours, and the introduction of regulations governing car safety and food hygiene (J. Mitchell 1997). Last but not least, the NCC was instrumental in the passage of the Credit Unions Act of 1979 and the Consumer Safety Act of 1986 (J. Mitchell 1997:579).

Consumerism During the Thatcher Era

As in the United States, British consumer organizations lost some of their political influence during the 1980s as the government grappled with such pressing economic problems as industrial decline and the loss of international competitiveness, inflation, high taxes and low income levels, and low-quality social services. As the official opposition during the late 1970s, the Conservative Party interpreted these problems as caused by excessive governmental involvement in the affairs of business (Fleming and Button 1989:85–86). Following her ascension to power in 1979, Margaret Thatcher consequently embarked on a long-term program of neoliberal political and economic reform that focused on the privatization of industry, deregulation, and a strict monetary policy.

Since the Thatcher reforms were driven primarily by politicians, they represented a departure from traditional modes of bureaucracy-centered policymaking. Thatcher's efforts to override tradition did not, however, go

completely unchecked; before long, she was forced to abandon some of the more radical aspects of her proposals as a concession to her opponents. Her government did manage, though, to shift the focus of consumer policy from an interventionist governmental stance in the economy to one that left far more to market forces.

In keeping with these new policy pronouncements, the size of the government's consumer administrative apparatus was scaled down. For example, the Department of Prices and Consumer Protection, which had been an important ally of consumer organizations during the Labour governments of the 1970s, was abolished and its functions subsumed under the junior-ranking minister for consumer affairs and small firms in the Department of Trade and Industry. Although the NCC was retained, financial support for that organ dropped precipitously.

Public and private consumer organs at the local level also felt the pinch. Most of the Consumer Advice Councils that had been established during the 1960s and 1970s, for example, disappeared after the Thatcher government ended its financial support in 1979 (G. Smith 1982:281). Not surprisingly, the loss of a local governmental ally had a deleterious effect on private consumer groups at the grassroots level, the number of which dropped to a postwar low of just sixteen by the mid-1990s (J. Mitchell 1997:577).

Although opportunities for consumer organizations to influence the policy process were reduced as a result of the policies and institutional changes of the Thatcher era, consumer protection policy did not take as much of a beating as it did in the United States during the Reagan administration. In fact, the government actually *strengthened* legal and regulatory protections for consumers by introducing the Consumer Safety Act and a number of other statutes and by shielding the country's social regulatory regime from deregulation. This suggests that despite Thatcher's free-market and anti-bureaucracy persuasions, the long-standing policymaking customs of bureaucratic accommodation and compromise among contending interests still prevailed. It also attests to the entrenched position of consumer advocates in the policy process, a position that was not easily usurped by a change in governmental personnel. By the early 1990s, the consumer's enhanced position in the economy was officially recognized in the so-called Citizens' Charter, a governmental statement of what consumers should reasonably expect from their public institutions: high standards, information, openness, choice, nondiscrimination, accessibility, and redress (Cullum 1997:174).

Consumer organizations contributed selectively to the reform process by conveying valuable information to both politicians and bureaucrats. With

regard to airline deregulation, for instance, the country's leading organizations extensively researched the economic and safety ramifications of comparable reforms in the United States and concluded that deregulation was in the consumer's best interest (Swann 1989:17). Consumer advocates also supported the deregulation of the professions and efforts by the General Agreement on Tariffs and Trade (GATT) to lower international trade barriers (G. Smith 1982:13), and opposed the inflationary Common Agricultural Policy of the European Union. In each instance, advocates were determined to lower consumer prices and increase the range of product choice in the marketplace.

The fact that privatization policies occupied such an important position in the neoliberal agenda of the Thatcher government had interesting—and unique—results for both regulation and the role of consumer organizations in the policymaking sphere. In many cases, the privatization process resulted in the “re-regulation” of a number of sectors in order to control competition where monopolies had once existed.²¹ In keeping with their traditionally consultative functions, consumer advocates went on to perform watchdog functions in agencies like the Office of Telecommunications (OFTEL) that were established to oversee these new regulatory controls (M. Smith 1993a:154). Consumer organizations may have played only a minor role in the movements to privatize and deregulate industry in Britain, but the end result of those policies was the establishment of new governmental agencies that in some ways enhanced the representation of the consumer interest in the political system.

Although contemporary British consumers are in many ways better off politically than their American counterparts, consumer advocates have not done as much as American organizations to expand their constituencies and adjust their principles and policy goals to the socioeconomic and institutional changes now confronting the movement. The CA and the NCC, for example, have done little to coordinate their advocacy activities with the wishes of smaller advocacy organizations and local consumer groups, many of which have vociferously opposed governmental efforts to deregulate the economy and privatize public corporations. Neither organization, moreover, has done much to embrace environmentalism, which is of increasing concern to consumers (Middleton 1998:213–27). Nor, with the partial exception of the NCC, has the organized movement shed its middle-class orientation by appealing more to underprivileged consumers (*The Economist*, June 18, 1994:62). The Consumers' Association, for example, continues to champion the kinds of consumer issues that were popular two or three decades ago

while failing to address many of the problems affecting “consumers-as-citizens” at the turn of the century. Had consumer advocacy organizations enjoyed broader membership bases or been faced with more narrow or less secure inroads into the policy process, they, like their American counterparts, might have proved more flexible in their organizational and conceptual approaches to consumerism. For now, however, they appear stuck in an increasingly outdated “middle-class groove” (*The Economist*, June 18, 1994:62).

Conclusion

The American and British consumer advocacy movements share a number of characteristics. Both experienced their most formative moments during the postwar period, when mass production and mass consumption had created a plethora of consumer-related problems and rising expectations of the quality of consumer life had reached new heights. Both movements, moreover, were largely guided from above by consumer advocates rather than fueled from below by grassroots citizen activism. Finally, consumer organizations in both countries looked primarily to their governments as the most capable guarantors of the consumer interest and suffered institutional setbacks when those guarantors retreated from the affairs of business.

American and British consumer organizations differ, however, in how they have articulated the consumer interest in the policy process and in their impact on policy outcomes. These differences, as the previous analysis has shown, can be largely explained with reference to the institutional contexts of the two movements. The relatively pluralist, decentralized, and fluid consumer policymaking process of the United States, for instance, has given American consumer organizations the kinds of political access and resources that have enabled them to maintain their organizational independence and to adopt aggressive but assimilative—as opposed to protest-oriented—strategies in the policy process. When the alliance between business and government is relatively weak and diffuse, those organizations perform agenda-setting, policy formulation, and bureaucratic whistle-blowing functions that have contributed to one of the most progressive consumer policy regimes in the world.

In Britain, by contrast, a more rigid, centralized, and semicorporatist consumer policy process combined with a closer and more enduring government-business relationship has compelled consumer organizations to

cooperate much more closely over the long term with other actors in the political system. As a result, advocates perform broad consultative functions in the policy process, as well as agenda-setting, policy formulation, and watchdog functions, and are more likely to seek compromise with business interests than their American counterparts are. At the same time, British consumer advocates throughout most of the postwar period have played a highly routinized role in the institutions of consumer policymaking while American advocates must constantly adapt to the vicissitudes of the United States's more fluid, decentralized political system. British consumer organizations, in other words, are more secure in their respective institutional context but have been largely incapable of bringing about the kind of progressive consumer protection policies that marked the heyday of American consumer movement activism.

In Japan, the institutional context of consumer politics resembles that of Britain in that policymaking is centered in the national bureaucracy and based in many ways on consensus building among different interests. But whereas British consumer organizations participate regularly and meaningfully in national consumer protection policymaking, Japanese consumer representatives have little more than symbolic representation in that process. On the surface, at least, the Japanese consumer policy process can be likened to a system of "corporatism without consumers."²² The reasons for the virtual exclusion of consumer representatives from national policymaking circles are rooted in the institutions of Japanese politics, especially those that appeared in the context of one-party dominance. How this particular state of affairs arose, as well as the efforts by evolving consumer organizations to permeate the system from below, are the subjects of the next three chapters.