

Full Length Research Paper

A comparative analysis of current trade union trends in the European Union and South Africa

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The primary objective of this study was to establish what factors currently influence trade unions as organisations in South Africa and the European Union and then to compare these factors. To conduct this study a pure literature examination was done. Firstly the levels of trade unionism were established and thereafter the factors contributing to the levels of trade unionism were identified. The difference between a developing country and already developed countries was explained before comparisons were made between South Africa and the European Union. Common factors that influence trade unions as organisations in both the European Union and South Africa include unemployment levels and job insecurity, changes in the employment relationship, work relationships outside the traditional employment relationship and finally the reasons why people join trade unions. Lastly, an interesting finding that emerged was that certain factors influencing trade unions as organisations are unique to specific countries.

Key words: Trade unions, European Union, South Africa, employment relations, labour force, unionism, developing countries.

INTRODUCTION

When considering the levels of trade unionism, a key starting point is to view the level of trade union density, defined as the proportion of employees who are union members (Fulton, 2007). Trade union density or trade union membership has fallen in most European countries in the last twenty to thirty years (Jensen, 2005). There has also been a decline of trade union membership in South Africa in recent years (Department of Labour, 2010b).

When these facts are considered, the question that arises is whether union decline should be a cause for general concern. Historically, unions have provided significant services to workers at enterprise and national level (D'Art and Turner, 2008). However, what trade unions did in the past is by no means an indication of what they will do in the future. Bibby (2004) therefore

justly comments that trade unions do not have a "divine right" to exist. While several have asked whether this decline can be attributed to specific economic, social, or institutional causes, few have provided concrete suggestions about how cross-national studies in this genre can offer information on efforts that seek to reverse this decline (Sano and Williamson, 2008). If the trends and tendencies of trade unions in first-world countries could be compared with those of third-world countries, it could provide meaningful insight into the future of trade unions as organisations.

For these reasons, it is of the utmost importance to establish the factors that contribute to the level of trade unionism in both first-world countries and third-world countries. In this article, a comparison will be made between the European Union (EU), which will represent first-world countries and South Africa, which will represent a third-world country. If it were possible to identify similarities and differences of the factors contributing to the level of trade unionism, one may be

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able to identify the factors that can be a cause for concern. By identifying these factors, it could help to develop much-needed suggestions on how to reverse the tendency of declining union membership numbers or, stated differently, the declining levels of trade unionism in South Africa.

METHODOLOGY

This article specifically aims to provide a comprehensive insight into the level of trade unionism in both the EU and South Africa, respectively. This research is unique in its field and, because of its unique nature, the paramount way to conduct such a study was to do an in-depth literature study. The literature that was studied specifically focused on the factors contributing to the level of trade unionism in those particular countries. Given the fact that this research is one of a kind in many aspects, the literature relating to the topic was in many instances rather limited. For this reason, specific works from a number of professionals and experts received a great deal of attention, since these works were very conducive to this research.

The main objective of this study was to first identify the specific factors that may influence the level of trade unionism in the respective countries and then to draw comparisons between first-world countries (the EU) and a third-world country (South Africa). The layout of this article is as follows. First, the level of trade unionism in the EU was established. Thereafter, the factors that contributed to the level of trade unionism in the different countries of the EU were determined. The area that follows explains the differences between developing and developed countries and how this phenomenon may influence the comparison of trade unions in the EU and South Africa. Subsequently, the focus shifted to South Africa where the levels of trade unionism in this country were determined and subsequently, factors that contribute to the level of trade unionism in South Africa were discussed. Following this area, comparisons were drawn between the EU and South Africa, specifically focusing on the level of trade unionism in these countries and the factors contributing to these levels of trade unionism. In the conclusion of this article, the most pressing issues for trade unions were highlighted, the limitations of this research were considered, and suggestions for further research were made.

LEVEL OF TRADE UNIONISM IN THE EUROPEAN UNION

Towards the end of the 1970s, various social, economic and political changes combined to create a colder climate for trade unions (D'Art and Turner, 2008). Consequently, over the last twenty years, there has been a distinct decline in trade union membership throughout most of Europe (FedEE, 2009; Fulton, 2007; Sano and Williamson, 2008; D'Art and Turner, 2008; Waddington, 2005; Rust, 2001).

The union membership losses are seen clearest in Central and Eastern Europe where, since the fall of the Iron Curtain in 1989, there were industrial restructuring and other fundamental changes in the role of trade unions. This had a major impact on its numbers (FedEE, 2009; Fulton, 2007). Furthermore, in Western Europe, major membership declines are evident in most of the

countries (Fulton, 2007). To be able to comprehend what the level of trade unionism is in the EU countries, numerous examples of trade union levels in the EU should be examined. These statistics will provide insight into the levels of trade unionism and the influence the unions have as organisations in the respective countries.

The average level of union membership across the whole of the EU, weighted by the numbers employed in the different member states, was 25% in 2007 (Fulton, 2007). This is a clear indication that membership numbers are declining, if it is considered that estimates show that union density fell from 32.6% in 1995 to 26.4% in 2001 in the then EU states (Waddington, 2005). The Federation of European Employers (FedEE) (2009) estimated that, in the medium term, the average level of unionisation across the EU will have fallen even further to just under 20% by 2010.

In Germany, for example, the main union confederation, the Deutscher Gewerkschaftsbund (DGB), has lost 43% of its membership since its peak in 1991 (Fulton, 2007). Also, in Poland, the recent low levels of unionisation, at only 14%, is in marked contrast to that of the Soviet-controlled era, when almost all workplaces were unionised (FedEE, 2009). Most of the employees who remain trade union members in Poland work for former state-owned companies (FedEE, 2009). In the United Kingdom, trade unions suffered major losses in the 1980s and in the first half of the 1990s. It would seem that membership numbers have stabilised, although the figures for 2006 show a slight fall in union density (Fulton, 2007).

In only eight out of the current 27 member states of the EU, more than half of the employed population are members of a trade union (FedEE, 2009). In fact, the European Union's four most populated states all have modest levels of unionisation, with Italy at 30%, the United Kingdom at 29%, Germany at 22% and France at only 8% (Fulton, 2007; FedEE, 2009). As a consequence, three out of every four people employed in the EU are now not members of a trade union (FedEE, 2009).

It should be noticed, however, that levels of union density vary widely across the EU, from 80% in Denmark to 8% in France (Fulton, 2007). Therefore, while trade union density has fallen in some European countries in the past two decades, for example in Germany, United Kingdom, Holland and Italy, in other countries – especially in the Nordic countries – the density level has been quite stable on a much higher level (Jensen, 2005). In most countries, union membership has been falling, but even where it is growing, it has not generally kept pace with the rise in the numbers of people employed (Fulton, 2007). In the EU, only seven states out of the 27 – Belgium, Cyprus, Ireland, Italy, Luxembourg, Malta and Spain – have seen a gain in union members among the employed in recent years and, in most of these countries, this growth has not kept pace with the overall growth in

employment, meaning that union density has drifted downwards (Fulton, 2007). According to Verma and Kochan (2004) as cited in D'Art and Turner (2008), it is thus important to understand that even though density levels may vary across membership states, trade unions now represent a smaller proportion of the employed labour force in Europe than at any time since 1950.

Factors contributing to the level of trade unionism specifically in the European Union

As can be seen from the statistics that were explained and discussed earlier, there is no doubt that trade union membership in the EU is declining. In most literature available on this topic, a distinction is made between external threats to the trade unions and internal inadequacies of trade unions to adapt to a changing world. In this research article, the decline of trade union membership numbers in the EU, considering all these factors in a combined form, will be examined, since all of these factors contribute to the decline of trade union membership in the EU.

Labour force composition

The first issue is the changing composition of the labour force. Increased problems to recruit union members and the changing composition of its potential and actual membership pose major challenges to union movements in Europe (Ebbinghaus, 2002). Employment is shifting from industry – where unionisation rates tend to be relatively high – to private sector services – where unionisation rates are lower (Waddington, 2005). Notably, greater union strength in the public than in the private sector is a common factor across Europe, both east and west (Fulton, 2007). Therefore, even though most union members are employed in the public sector, this sector represents a relatively small proportion of the labour force in most EU countries (Waddington, 2005). In Poland, for example, a survey in 2005 found that 67% of respondents from the public sector reported that there was a union in their workplace, while in the private sector the figure was only 9%. In the Netherlands union density is highest in public administration – at 39% (Fulton, 2007). There is thus a remarkable difference between the public sector and private sector union representation.

Unemployment

The second factor that contributes to declining union membership is that unemployment figures are on the rise. Rising unemployment has had a negative influence on trade union membership numbers (Waddington, 2005). In most countries, trade unions offer relatively few services to the unemployed and the consequence is that most

trade unionists who become unemployed abandon their union membership (Waddington, 2005). However, in the Nordic countries of Denmark, Sweden and Finland, where approximately three-quarters or more of all employees are in unions, these high numbers are a reflection of an approach that sees union membership as a natural part of employment (Fulton, 2007). In these countries, retired and unemployed people form an increasing proportion of union membership numbers (Waddington, 2005). This is because, as in Belgium – which also has above-average levels of union density – unemployment and other social benefits are normally paid out through the union (Fulton, 2007). According to Carley (2004) as cited in Waddington (2005), the data that was supplied by the European industrial relations observatory suggests that between 15 and 20% of trade union members in the EU are either unemployed or retired.

Age of trade union members

Another cause for concern about future levels of trade unionism is the low membership numbers among young workers (Ebbinghaus, 2002). Since the early 1980s, there has been a substantial rise in the percentage of employees who have never been union members (Bryson and Gomez, 2005). The tendency not to become a union member can be caused by a number of factors *inter alia* that trade union practices are seen as too formal and old-fashioned and as such they put potential members off, particularly the young. Young people perceive trade unions as being dominated by middle-aged men and in some countries trade unionists are still seen as primarily male and employed in manual occupations (Waddington, 2005).

Skill levels of the labour force

The next factor that became apparent is that a rising proportion of trade union members are employed in managerial, professional or associate professional occupations (Waddington, 2005). To organise professional workers successfully and appropriately, unions need to understand their needs and concerns (Bibby, 2004). Numerous scholars believe that collectivist attitudes among workers have been replaced by individualistic leanings (Furåker and Berglund, 2003). However, the problem is that with the general individualisation of society (Beck, 2000 cited in Jensen, 2005), potential members are less likely to join trade unions. The evidence on the extent of individualisation is mixed, but it is clear that potential members are more individualistic than in the past, which means that trade unions have to be seen to deliver “value for money” if they are to recruit members (Waddington, 2005). Unions

must be able to handle the consequences of the alleged individualisation process, for if they are not able to do so, they are likely to run into problems keeping and recruiting members (Furåker and Berglund, 2003). Professionals expect unions themselves to be professional, and to deliver the services members need in an efficient way (Bibby, 2004). In order to do this, several of the unions and confederations that represent members from these occupations tend to highlight individual rather than collective membership identities, particularly on the issue of pay (Waddington, 2005). The sense of collective solidarity is likely to be weaker than for other groups of workers, and there may be less of a tradition of union organisation on which unions can build (Bibby, 2004).

Changing employment relationships

Another tendency emerging in the labour market is that employment relationships are changing (Bibby, 2004). A study that examined why members leave unions was conducted in the UK. It considered the results of three large trade unions and found that the majority of leavers from each of the unions left because of changes in their employment circumstances (Waddington, 2006). These changes in organisations caused hierarchical power disparities to be removed and thus reduce conflict between employees and managers (Hodgson, 1999 cited in D'Art and Turner, 2008). Even where the legal employer/employee relationship remains unchanged, the implicit contract between company and worker – by which an individual could expect to be offered security and reward in exchange for his or her corporate loyalty – has certainly changed (Bibby, 2004). Previously, or rather in the traditional employment relationship, a trade union's function was to engage in collective bargaining with its members' employers, and to represent its members in grievance and disciplinary matters (Grogan, 2003). A large number of potential union members now feel that they can best deal with their manager directly, rather than rely on a union representative as an intermediary, and thus also remain apart from unions (Waddington, 2005).

A further problem arising in the changing employment relations is the new forms of contractual relationships that are developing outside the traditional employer/employee contract on which so much employment legislation and social insurance protection, particularly in Europe, are based (Bibby, 2004). This includes, for example, agency working and corporate outsourcing to nominally independent freelance contractors (Bibby, 2004).

A growing number of employers are resisting unionisation to a greater extent than in the past (Waddington, 2005). While this tendency is often linked with United States employers setting up operations within the EU, there is increasing evidence of European-based employers questioning the need for a union presence,

particularly in the new member states (Waddington, 2005). Attempts by employers to decentralise collective bargaining have also required trade unions to establish new co-ordination mechanisms, which several have failed to do, with the consequence that members may feel isolated from the union while at the workplace (Waddington, 2005).

An increase in the number of women entering the workforce

An interesting tendency emerging in the labour force of the EU in recent years is that union membership is becoming increasingly feminised (Waddington, 2005). Trade unionism in the 20th century was mainly a man's business (Mac Shane, 2001). This has of course been related to the fact that male workers in the greater part of the 20th century dominated (in numbers) the workforce (Jensen, 2005). The growing participation of women in the labour market since the end of the Second World War has meant that the female share of the membership base in the trade unions has been growing (Jensen, 2005). In Sweden, for example, union density among women is 81% as compared with only 75% for men (Fulton, 2007). The trade union density in the rest of the Nordic countries, including Norway, Denmark and Finland, is also higher among the female workers compared with the male workers (Jensen, 2005). However, in some countries, such as Germany, Italy and Austria, the level of male unionisation is higher than the level of female unionisation (Jensen, 2005). In this day and age, women demand an equal presence in the labour market, but have different priorities from male workers (Mac Shane, 2001). It is important to notice that, even though union movements have become more inclusive, the representation of women's interests in union decision-making, particularly in collective bargaining policy, still lag behind (Ebbinghaus, 2002). Although this tendency has received some attention, as was apparent from the literature studied, it remains unclear what influence it will have on the level of trade unionism.

Numerous factors may contribute to the declining figures of trade union members or the level of trade unionism experienced in the EU. The factors that were highlighted and discussed in the preceding section received a great deal of attention in the large amount of literature examined. This was a clear indication that these were the most pressing issues when considering the declining trade union membership figures in the EU.

DEVELOPED COUNTRIES VERSUS DEVELOPING COUNTRIES

The next area of this article will focus specifically on the

level of trade unionism and the factors contributing to these levels of trade unionism in South Africa. Thereafter, a comparison of the levels of trade unionism will be drawn between South Africa and the EU. However, before a comparison can be drawn between South Africa and the EU, it is important to consider and to understand that, while the EU consists only of already developed countries (Adams, 2002), also known as industrialised countries, South Africa is still classified (broadly considered) as a developing country or developing economy. How does one distinguish between developed and developing countries? Generally, terms such as rich and poor, advanced and backward, high income and low income and industrial and agricultural are used to differentiate between developed and developing countries (Adams, 2002).

Developing economies are sometimes also referred to as low-income and middle-income economies, and developed economies as high-income economies (The World Bank, 2011). When classifying economies the main criterion used is the gross national income of a country (The World Bank, 2011). This term was previously referred to as the gross national product (The World Bank, 2011). Based on its gross national income per capita, every economy or country is classified as low income, middle income (subdivided into lower middle and upper middle), or high income (African Development Bank Group, 2010; The World Bank 2011).

The term first world – industrialised or developed countries – refers to the fact that these countries are the nations in the world with the most advanced economies, highest standards of living, the most advanced technology and have the greatest influence in the world (Nations online, 2010). They have extensive infrastructure, a largely urban population, an educated labour force and, frequently, competence in high tech and science (Adams, 2002). They tend on the whole to be wealthy, they have a higher income per capita than most other countries and they are oriented towards a free market economy (Bothma, 2010). Many of these countries are mature, and consequently, are growing only slowly (Adams, 2002). Population growth is often stagnant and the population tends to be an ageing one (Bothma, 2010). The developed countries of the world include, in North America, the United States and Canada; in Europe, the countries of the European Union; and in the Pacific, Japan, Australia and New Zealand (Adams, 2002; Bothma, 2010).

South Africa, on the other hand, is still a developing country. According to the country classification of the World Bank, South Africa is an upper-middle-income country (The World Bank, 2011). Other countries in Africa, apart from South Africa, that also fall under the upper-middle-income category, include Algeria, Botswana, Gabon, Namibia, Equatorial Guinea, Seychelles, Mauritius and Libya (African Development

Bank Group, 2010). All of the middle-income countries face significant development challenges, but the nature of these challenges varies substantially within the group (Fallon et al., 2001). The middle-income countries vary from countries that are still very poor, to better-off transition economies with relatively sophisticated emerging markets. Progress with integration into the global economy varies greatly from one middle-income country to the other (Fallon et al., 2001).

However, in a continent where over 70% of the countries fall under the low-income category (African Development Bank Group, 2010) South Africa, with its upper-middle-income status, is an anomaly among the developing countries. South Africa has a two-tiered economy; it is both a developed country with good infrastructure, but also a country with huge social and economic problems associated with a developing country (U.S. Department of State 2010; Layne, 1998; Bothma, 2010). This implies that, even though South Africa is developed in many aspects, it still has a productive and industrialised economy that exhibits many characteristics associated with developing countries, including a division of labour between formal and informal sectors and uneven distribution of wealth and income (U.S. Department of State 2010; Bothma, 2010).

After South Africa's re-acceptance into the international community following the many years of isolation under the apartheid government, it is understandable that it has only recently become a fully fledged member of the global community (Venter, 2003). To illustrate how keen South Africa as a country is to develop and to be part of the global community the following example is provided. In 2010 the State President of South Africa, Jacob Zuma, expressed the desire and willingness of South Africa to be considered among the leaders of the developing world by joining the rest of the Brazil, Russia, India and China (BRIC) countries (Wong, 2010; Volkhonsky, 2010; Olesen, 2010; Blanchard, 2010). The BRIC nations (the informal grouping of Brazil, Russia, India and China) are all developing countries, but they are unique in the sense that all of these countries are fast-growing economies.

As a result of this aspiration of South Africa, voiced by the State President, the country was invited to join the BRIC group in December of the same year (All Africa.com, 2011; BUA news, 2011). Early in 2011 during the state of the nation address by the State President, he reconfirmed that South Africa would be joining the "important bloc of emerging economies" (The Herald online 2011; IOL news, 2011). South Africa was officially incorporated into BRIC at the heads-of-state summit held in China in April 2011 (All Africa.com, 2011; BUA news, 2011). The inclusion of South Africa – the first African country to be admitted to the group – saw the acronym changed to BRICS (All Africa.com 2011; Inessa, 2011). The BRICS group is regarded as the fastest emerging market in the world (All Africa.com, 2011). Studies show

that by the year 2050, the combined economies of BRICS could eclipse the combined economies of the current richest countries of the world (All Africa.com, 2011).

The fact that South Africa has joined this group implies that the political and economic clout of the country will rise and its trade position in the world will be improved (Olesen, 2010; All Africa.com, 2011). Additionally, South Africa as an important emerging economy would serve as a gateway to other African markets (South Africa: Economy Overview, 2008) and offer opportunities for the whole of Africa to strengthen its ties with the group (All Africa.com, 2011).

Even though the members of BRIC voiced their support for South Africa to join the informal grouping (Radyuhin, 2010; BUA news, 2011), some experts remain doubtful about the strategic feasibility of this move. It is predicted that by the year 2050 Brazil, Russia, India and China will be the the most dominant economies in the world (Volkhonsky, 2010; Kulkarni, 2010). South Africa on the other hand can hardly be considered a country with a strong economic potential (Inessa, 2011). South Africa's GDP is only one fourth of that of Russia, which is the most modest within BRIC (Inessa, 2011). South Africa looks even more out of its depth when compared with China, which recently became the world's second largest economy only after the United States of America (Inessa, 2011). Both chains of thought carry valid arguments and only time will tell whether South Africa has the ability and capacity to associate itself with these fast-growing economies.

Nevertheless there may be some logic to include South Africa in this group, when considering that South Africa has abundant natural resources. The formal sector of the country is well developed when taking into account the manufacturing, services, mining, agricultural, financial, communications, energy and transport sectors. Furthermore, the country's stock exchange is ranked among the top 20 in the world (US Department of State, 2010; South Africa: Economy Overview, 2008). South Africa also has a world-class and progressive legal framework and the legislation governing commerce, labour and maritime issues are particularly well developed (South Africa: Economy Overview, 2008).

South Africa is unique in so many aspects and the developmental status of the country is no exception. South Africa has moved further down the developmental path than numerous other developing countries and shows many characteristics of already developed countries, but it is important to remember that it is still classified as a developing country. The reason why this phenomenon should be brought into consideration is that it may influence the factors that can contribute to the level of trade unionism in the respective countries.

For this reason, much attention was given to the research already done by Jose (1999), for the International Institute for Labour Studies, which focused

on the future of the labour movement, with specific reference to developing countries. The observations made by Jose (1999) were used as guidelines for identifying possible factors that may influence, contribute to, or even threaten unions as organisations in South Africa. In addition to that, the report compiled by Webster (2006) for COSATU, the largest and one of the most influential trade union federations in South Africa, was taken into consideration. The information that was provided by Webster (2006) at COSATU's twentieth anniversary celebration was also very significant to this research, since that academic insight specifically focused on the future of trade unions as organisations in South Africa. Even though much-deserved attention was given to the above-mentioned literature, it was by no means the only resource consulted. In the following area, some of the findings made by Jose (1999) and Webster (2006) might be confirmed, but rich insight from other literature is also provided. Some of these factors, which are discussed in the following area, may be unique to developing countries or in some instances even only to South Africa as a country.

LEVEL OF TRADE UNIONISM IN SOUTH AFRICA

In South Africa, the membership of registered trade unions increased quite sharply in the period between 1980 and 2000, from 782 000 in 1980 to the current 3 million, which represents an annual increase of nearly 6% (Barker, 2007). Notably, the number of unions increased sharply after 1995, which was probably as a result of the changes to the Labour Relations Act (LRA), which made trade union registration easier (Barker, 2007). In fact, the number of registered unions rose from 302 in 1995 to some 499 in 1999. (Venter, 2003: 83). Union membership increased almost continuously up to 2002 (Barker, 2007). However, this changed from 2002, and there has been a clear downward trend in union membership since then (Barker, 2007: 93).

In 2005, approximately 259 employers' organisations and some 345 trade unions were registered with the Department of Labour, cited in Grobler et al. (2005: 39). The latest statistics available, supplied by the Labour Department, show that South Africa currently has 202 registered trade unions and 166 registered employers' organisations (Department of Labour, 2010a; Department of Labour, 2010b). This is a clear indication of the declining figures of both trade unions and employers' organisations. However, the union density in South Africa, compared with international standards, is still relatively high because almost 40% of all workers with jobs belong to trade unions (Grobler et al., 2006; Barker, 2007).

Nevertheless, even if trade unions in South Africa still have relatively high membership numbers in comparison

with other countries, the statistics gave a clear indication of the downward trend of union membership numbers. Considering this, it becomes all the more apparent that much-needed attention should be given to factors that may contribute to the future existence of registered trade unions in South Africa.

Factors contributing to the level of trade unionism in South Africa

The labour relationship is essentially a relationship between employer and employee, as well as between employer/employee and the state, thus making it a tripartite relationship (Venter, 2003: 9). South African labour legislation is supportive of trade unions in that it underpins a tripartite system of labour relations (Vettori, 2005). The most important role players in the South African labour market are the state, employer associations, and trade unions or trade union federations (Vettori, 2005; Venter, 2003).

The first question to be asked then, is how does the Government protect unions and what frameworks are set in place by this institution, which plays such a major role in the regulation of the labour relations of South Africa? The role of the state is to create, by means of policy and legislation, a framework within which the other parties can conduct their relationship (Nel et al., 2005). Legislation on, for example, the right to associate (i.e. to form labour unions), the right to collective bargaining and the right to strike fundamentally influence the balance of power in employment relations (Nel et al., 2005).

Legislation governing labour relations

To demonstrate the extent of support given by Government, by means of implementation of specific labour legislation, the following paragraphs will exclusively deal with all the provisions made by these laws. South Africa, as a country, has seen phenomenal changes in our labour dispensation, commencing with the enactment of the LRA (Raju and Stilwell, 2007). The LRA introduced an equality-based industrial relations system that actively promotes the formation of trade unions and that creates an environment so conducive to collective bargaining that some staff associations have chosen to become trade unions to reap the benefits (Raju and Stilwell, 2007). The South African legislature has adopted several strategies to maintain union strength (Vettori, 2005).

Provision for both agency-shop and closed-shop agreements

The first example of the protection of trade unions that

becomes apparent is that the LRA provides for both agency-shop (Section 25) and closed-shop (Section 26) agreements for trade unions in the workplace (LRA, no 66 of 1995). In Section 26(1), the LRA provides that a representative trade union and an employer or employers' organisation may conclude a collective agreement, known as a closed-shop agreement, which requires all employees covered by the agreement to be members of the trade union (LRA, no 66 of 1995). Furthermore, the LRA also states in Section 25(1) that a representative and an employer or employers' organisation may conclude a collective agreement, known as an agency-shop agreement, which requires the employer to deduct an agreed agency fee from the wages of employees identified in the agreement who are not members of the trade union but are eligible for membership thereof. What this essentially means is that non-members of the trade union may be obliged either to pay trade union fees or to become trade union members (Vettori 2005). These agreements are generally referred to as "union security arrangements" (Vettori 2005).

Rights regarding strike actions

The second case in point comes to light with regard to the right to strike. In this regard, the LRA also made certain provisions to promote unionism. The right to strike is one of the fundamental rights of employees and this is recognised by the South African law in both the LRA (Section 64(1)) and the Constitution (S 23(2)(c)); (Vettori, 2005). However, the same is not true of secondary strikes (Vettori, 2005). In many countries it is unlawful to go on secondary strikes, as for example in New Zealand (Forsyth, 2001), while legislation in others countries, for instance the United Kingdom, has placed severe restrictions on secondary labour action (Vettori, 2005). In contrast, the LRA provides for the legitimacy of secondary strikes in Section 66, and even though there are some restrictions in place, it should nevertheless be argued that provisions for such actions were provided for by the LRA (Vettori, 2005).

The question of whether a worker is an employee or not

The third example of the protection of trade unions by the South African labour legislation is in the issue of whether a worker is an employee or not. Most forms of atypical employment, such as part-time work, contract work, temporary work, home-based work and leased work, do not readily lend themselves to unionisation (Vettori 2005). Employers may find it attractive to classify their workers as atypical employees to avoid the provisions of labour legislation and collective agreements, tax payments, social security payments, and the provision of fringe

benefits (Vettori 2005). In this regard, South African legislation once again comes to the rescue of trade unions (Vettori 2005). The Labour Relations Amendment Act (12/2002) and the Basic Conditions of Employment Act (75/1997) create a rebuttable presumption that a person is an employee if one or more conditions exist (Basson et al., 2005). Section 200A of the LRA specifies the conditions to be considered when dealing with this specific issue (Basson et al., 2005). When the section is read, it is clear that the legislation shifts the burden of proof to the employer (Vettori, 2005). The employer will therefore have to prove that the person is not an employee before it is legally binding (Vettori, 2005).

Transfer of business ownership

The next example is one where a business that had previously recognised a union is transferred to another employer. In this case, the union would run the risk that the new employer will not recognise it and that any collective agreements entered into with the previous employer will not be observed by the new employer (Vettori, 2005). A scenario such as this could pose a problem for all employees and their trade unions if there is no form of protection from government set in place. Fortunately, provisions and even amendments were made by the LRA to protect trade unions.

The original section 197 of the LRA, dealing with the transfer of ownership, applied when the whole or part of a business, trade or undertaking was transferred from one employer to another "as a going concern", whether in circumstances of solvency or insolvency (Grogan, 2003). The original version of that section was not happily drafted, and was replaced in its entirety in 2002 (Grogan, 2003). The amendments made to the LRA foresee this problem, which can arise with a transfer and the amended Act provides in Section 197(5)(b) that, unless otherwise agreed between the union or employees, the terms and conditions of collective agreements and arbitration awards are transferred to the new employer (Basson et al., 2005: 173).

Trade union membership fees

Another example of trade-union protection by the State is the legislation regulating trade-union fees. The legality of the organisational right of stop-order facilities for the collection of trade-union dues, as well as that to establish agency shops, has been questioned by the world over (Vettori, 2005). Nevertheless, they are provided for in terms of our legislation and provide trade unions with huge administrative and financial advantages (Vettori, 2005). These stop-order facilities, which are supported by government, enable unions to deduct monies from employees and as such ensure financial security (Vettori,

2005).

Disclosure of information

The final example, in which the State has improved or at least secured the position of unions as negotiating parties in the workplace, is by legislation addressing disclosure of information. In dealing with their employers, employees regard access to business information as essential in order for them to gauge the employer's financial position, as well as the employer's ability to meet with their demands (Van der Walt, 2007:26). Information disclosure is a vital element in joint decision-making and in labour relations processes, such as dispute resolution, collective bargaining and consultation (Van der Walt, 2003: 543).

Apart from the Promotion of Access to Information Act (2/2000), legislation that specifically deals with access to information, particularly in the work situation, is section 16 of the LRA (Van der Walt, 2007: 25). These Acts have paved the way for the creation of a culture of un-coerced disclosure of information in South African organisations (Van der Walt, 2007: 25). The support of unions by government, by means of this legislation, is very clear, since it unmistakably provides for the right of unions to negotiate and bargain with employers and employers' organisations in an informed manner.

When considering the legislation governing employment relations, especially legislation regarding trade unions, it would seem as if government is in fact supportive of the notion of protecting unions. In fact, South Africa does more than most other countries to protect trade unions (Vettori, 2005). Considering the support provided by the legislation governing labour matters such as the protection of trade unions in South Africa, one needs to consider what trade unions themselves do as organisations to protect themselves. According to Jose (1999), the role of trade unions as organisations is influenced by the extent to which unions have developed appropriate structures and capacity to deal with labour issues arising at local, regional and global level.

Focus shift and change within trade unions

Even though labour unions originated and grew because of the industrial era, the leaders of these institutions could not predict what the consequences would be of the post-industrial era, the globalisation factor and everything that this would entail (Ceronie, 2007). In first-world countries, unions have not been able to maintain their position in the last two decades (Rust, 2001). In 2007, Solidarity's president, Steve Scott, said in his presidential address, that trade unions may end up on the list of endangered species and may even become extinct if they do not undergo radical changes to adapt to the new economy

(Hermann, 2007).

Labour unions are confronted with the necessity to change and to adapt and are exposed to problems of economical puzzles, legal requirements, technology and financial issues (Ceronie, 2007). Unions must keep up with changes, such as increasing diversity in the workplace, more women in the working environment, a focus shift to competence and capability, productivity, growing socio-economical puzzles, responsibilities, training and development (Ceronie, 2007). Furthermore, unions must face challenges such as shrinking membership numbers, financial obligations and the outflow or "brain drain" of our knowledge base (Ceronie, 2007).

Considering the possible need for a focus shift or a need to change, one of the leading trade unions in South Africa, Solidarity, announced an eight-point plan at its annual conference in 2007. This plan was formulated with the sole purpose of providing trade unions with guidelines for how to approach the future (Anon, 2007).

1. Unions must globalise in order to reduce the negative influence that multi-national companies have on regular employees across the world.
2. Unions must compel governments to recognise the international conventions that protect the rights of employees across the globe.
3. Unions must do more to train their members in order to make them employable.
4. Unions must mobilise the public's opinion in order to get the support of the community for their actions.
5. Unions must be the leaders in the knowledge debate and must be able to provide solutions for problems in the labour market.
6. Unions must gear themselves to use modern technology more effectively in order to improve and speed up their service delivery to their members.
7. Unions must start to organise individuals and not only groups of employees.
8. Unions must let their protection of their members be recognised through being the collective agent (Anon, 2007).

Unions have to be innovative and pro-active in the way that they support their members. To support this statement, Bibby (2004) states that many unions are actively engaged in valuable pioneering work in a number of areas. These advancements of unions extend the traditional support offered through the processes of social dialogue and collective bargaining into a range of other, innovative services, in many cases specifically tailored to the needs of professionals and managers. Some examples are (Bibby, 2004):

1. Support in undertaking needs analyses and also in career development;
2. Direct help in finding new and better employment;

3. Direct help in training and lifelong learning;
4. Support for workers working as freelancers or independent contractors;
5. Support for staff working abroad;
6. Innovative uses of new technology in communicating with professional and managerial staff.

Considering this information, one gets the impression that trade unions are in fact aware of the challenges that face them and of the necessity to change and adapt. Evidently, unions as organisations are trying to reform themselves to accommodate the changes that the work environment offers. However, if a trade union should fail to comply with the "new rules" of an ever-changing work environment, such a union may have trouble surviving in the future.

Changes in the work environment and globalisation

The next issue that became apparent when studying different literature was the possible influence that globalisation may have on the level of trade unionism. The world of work is changing rapidly (Bibby, 2004). The assumptions that individuals and societies could hold about the nature of jobs and employment just a generation ago no longer seem to apply today (Bibby, 2004). Globalisation has had an impact on workers and their organisations in developing countries (Jose, 1999). Under the impact of work restructuring caused by globalisation, the labour market has become increasingly fragmented (Webster, 2006). The new global economies have brought competitive changes unequalled in South African history (Grobler et al., 2006). Because of the economic and political isolation of South Africa until 1994, many unions in South Africa concentrated largely on their own affairs (Grobler et al., 2006: 425). However, now in the post-apartheid era international relations have become very important to unions because of the globalisation of the world economy (Grobler et al., 2006). However, a problem that has been identified by Solidarity is that trade unions are not keeping up with the global revolution (Hermann, 2007). Trade unions continue to behave as if they still find themselves in the industrial era (Hermann, 2007). Unions regard mass mobilisation as the be-all and end-all of trade unionism (Hermann, 2007). In research conducted on the effect of globalisation on unions, Sano and Williamson (2008) found that globalisation has significant effects regarding workplace access and the centralisation of collective bargaining. It is thus critical to consider what changes within unions, as organisations, should be made in order to meet the challenges presented by the new economy. Hermann (2007) is of the opinion that a much more sophisticated approach to trade unionism is needed in the new economy.

Considering this, the question of Thobile (2000) becomes all the more important. Does economic globalisation offer any positive opportunities to trade unions? Pessimists within unions point to the decline in labour standards, erosion of worker rights, job insecurity, threats to collective bargaining and the changing nature of the work (Thobile, 2000). Optimists argue that prospects for international worker solidarity have become brighter (Thobile, 2000). According to Grobler et al. (2006: 24), "globalisation brings new opportunities, such as joint ventures, but also puts increasing pressure on South African workers and management to meet the challenge presented by foreign competition".

Nowhere in the world is it possible for a union to be completely sheltered from the forces of globalisation (Wood, 2001). An increasingly globalised economy is resulting in the rapid growth in international trade, in services as well as in goods (Bibby, 2004). With the accent now placed on speed and quality, the demand for the traditional worker has virtually been eliminated (Rust, 2001:59). Through the interlinking of product markets and the high mobility of skills, labour markets have also become closely linked with those of other countries and this applies to both skilled and unskilled labour (Barker, 2007: 146). In addition to the mobility of labour between countries, jobs may in many cases also be quite mobile (Barker, 2007). Employers may, for instance, move their businesses to neighbouring countries should the prospect of profits be better in the light of wage levels, taxation, political stability and other factors (Barker, 2007). This puts workers in different countries in competition with each other, which opens up the danger of a "levelling down" in wages and working conditions (Bezuidenhout, 2000). As workers across the globe are becoming more closely linked through common employers, or through the threat of factories relocating to areas where labour is docile and cheap, trade unions have increasingly become aware of the need for a different approach to their campaigns (Bezuidenhout, 2000).

According to Hermann (2007) the deputy general secretary of the trade union Solidarity, their union president Steve Scott, said in his presidential address in 2007 that trade unions will have to join forces across national borders. According to Scott, multi-national companies have grown so large that their turnover is sometimes larger than that of many countries (Hermann, 2007). He continues by saying that, if trade unions are to provide effective protection to their members in the global era, they will have to be very powerful forces (Hermann, 2007). Consequently, Solidarity announced a programme for trade unionism in 2007 to confront the challenges of the new economy (Hermann, 2007). This programme includes workers' training, mobilisation of the capital of labour, international trade union ties, national enforcement of international labour conventions and new trade union service delivery methods (Hermann, 2007).

Reasons for joining a trade union

With so much focus on the changing work environment, for example the changes in the relationship between the employee and employer, technological changes or globalisation, the reasons why employees join unions should be reconsidered. Do the same reasons for joining unions still apply or has there been a shift in the motivation for employees? From a historical perspective, unions were formed when industrialisation forced workers into positions of dependency in which their earnings, working conditions and job security were largely beyond their control as individuals (Barker, 2007). As a result, workers increasingly bonded together to prevent exploitation and to promote their interests (Barker, 2007: 87). The challenge facing labour in the seventies and eighties was thus to build shop-floor-based industrial unions (Webster, 2006). Apart from the challenges workers faced during the industrial era, South African workers had the unique struggle of fighting apartheid. The South African labour movement, including unions, was instrumental in campaigns to end apartheid (Bezuidenhout, 2000). However, since South Africa became a democracy, public opinion about the labour movement has changed considerably (Bezuidenhout, 2000). As explained by Webster (2006), today's challenge requires new organisational forms, new alliances and new strategies.

According to Ceronie (2007), there has been a loss of ideological support for unions since South Africa became a democratic society. The establishment of the democracy had the effect that a huge driving gear to belong to a union was lost. He further states that the so-called survival struggle for rectification of the labour market has reached its end with the first democratic elections of the new government. This no longer meant that much to workers who supported the struggle to belong to unions, and the desire to be a trade union member declined.

Nevertheless, the goals of unions, internationally as well as in South Africa, have not changed significantly over the years (Grobler et al., 2006: 418). They point out that in a broad sense, the primary goal of any union is to promote the interests of its members. So why, they ask, do employees choose to join a union? They believe that a great deal of time and effort has been devoted to asking that exact question. Studies have failed to find a list of reasons that apply to all organising efforts, but there is general agreement among labour experts that certain issues are likely to lead to an organising drive by employees (Grobler et al., 2006). According to Fanaroff (2003) as cited in Grobler et al. (2006), employees may be motivated to join a union for *inter alia* job security, negotiating better wages and benefits, better working conditions, fair and just supervision, mechanism to be heard and the need to belong. Through collective

bargaining and lobbying for labour legislation, union leaders enhance their members' standard of living and improve many conditions that surround their work (Grobler et al., 2006: 419).

Different opinions therefore exist among labour experts as to whether there has been a shift in the motivation of employees to join a trade union or not. However, regardless of employees' motives for joining trade unions, what is clear is that employees join unions for specific reasons and trade unions should provide these services to their members to prevent an even further decline in membership numbers.

Technological changes and advancements

The next factor that influences the strength and impact of trade unions and their ability to organise that became apparent, was technological changes and advancements. There is little doubt that technology is reshaping the way business is conducted in today's society (Ramlall, 2003). There is a discernible trend towards enterprise down-sizing and a shift in industrial employment away from large enterprises (Jose, 1999). This trend, he states, is connected with technological changes.

Improvements in technology, and particularly information technology, have had a fundamental impact on the employment relationship (Venter, 2003). Technology also impacts on the design, location, and nature of work itself (Venter, 2003: 22). The goal of a business remains an organised effort of individuals to produce and sell, for a profit, products and services that satisfy society's needs, but with greater utilisation of technology to effectively compete in the global economy (Ramlall, 2003).

A prime example of changes that took place in organisations is the concept of the virtual office place, and telecommuting, where workers are able to interface with the central office by means of information and telecommunications technology and thus work from home instead of commuting to work (Venter, 2003: 22). It is of paramount importance to ensure that an organisation's structure is designed in a manner that supports the creation of new ideas and maximises the use of available technology (Ramlall, 2003). Utilising available technology, he says, is a necessary component of any forward-thinking organisation in the global economy. Many organisations have changed or adapted their organisational structures in recent years. Coupled with this, there are many smaller enterprises, flatter structures in workplaces, declines in trade union presence and influence, and corporate quests for flexibility and competitiveness (Vettori, 2007). Vettori (2007: 16) continues by saying that "the huge shift in organisational structures has also resulted in trade unions becoming weaker, not only through loss of trade union members, but also through the difficulty of organising and maintaining

members". As the scale of enterprise diminishes, so it becomes more difficult for trade unions to organise, causing the potential harm or damage that a trade union can yield in a huge organisation to dissipate in smaller enterprises (Vettori, 2007).

Job insecurity and unemployment

The final factor that became apparent with this study was the influence of unemployment and job insecurity on union membership and subsequently on the level of trade unionism in South Africa. Too many South Africans are unemployed (Banerjee et al., 2007). South Africa's unemployment figure is one of the most alarming features of its labour market (Venter, 2003: 114). In 2009, the unemployment figure released by Statistics South Africa (StatsSA) showed that unemployment rose to 23.5% during the first quarter of the previous year and, according to the trade union Solidarity, unemployment is probably much higher (Kleynhans, 2009). Just how many people are unemployed depends on how one defines unemployment (Banerjee et al., 2007). According to Kleynhans (2009), the problem with SA's unemployment figures is that discouraged job seekers are not included in their definition of unemployment. Discouraged job seekers, he says, can be defined as unemployed people who are not actively looking for work. The individuals who had not actively looked for work in the period of four weeks preceding the research were thus excluded.

High unemployment figures in South Africa complicate matters in the labour environment for the country and in the opportunity for trade unions to organise effectively (Nel et al., 2005). The bargaining power of trade unions in times of high unemployment, combined with the new structure of organisations and the predominance of small organisations, has been severely eroded (Vettori, 2007: 17). According to Venter (2003) and Nel et al. (2005), employees join unions for a number of reasons, including job security issues. Venter (2003:71) stated that "unions intervene to protect the members against unfair dismissals. This is particularly true for South Africa, where retrenchments are commonplace, and levels of job insecurity are particularly high". Visser (1995) as cited in De Witte et al. (2007) confirms this by saying that the threat of unemployment has motivated many employees to take the precaution of becoming a union member or to remain one (Visser, 1995: 60).

Research on the effects of job insecurity has focused almost exclusively on consequences for the individual employee and the company (De Witte et al., 2007). They say that little research has been conducted on the effects of job insecurity for unions and for union participation. They advise that, for the labour movement, it is therefore crucial to find out whether there is an association between job insecurity and union membership, since a

change (rise or fall) in the number of members as a consequence of job insecurity has important implications for the future of the union movement and its strength.

Practices such as subcontracting, outsourcing and the hiring of temporary and part-time workers, long considered as atypical employment, are becoming more common, especially at the lower end of the labour market (Jose, 1999). Employers increasingly appear to be less inclined to employ workers on a full-time, permanent basis (Barker, 2007). Therefore, three categories for workers, namely the core of relatively secure workers enjoying full-time work and benefits, the non-core of increasingly insecure part-time, contract and out-sourced workers, and a growing periphery of informal workers and the unemployed, are emerging (Webster, 2006). With the research that was done in South Africa by the Department of Labour, it was found that the increasing use of non-standard employment is eroding labour standards in a number of ways (Barker, 2007). With regard to atypical employment, the following observations were summarised by Barker (2007: 134): "even though such employees enjoy the same rights in theory, in practice it is very difficult for a union to organise workers whose workplace and hours of work are frequently changed". A disturbing realisation is that unions are still fighting for stable jobs that no longer exist (Vettori, 2007).

In some quarters of South Africa's labour movement, there is thus the perceived higher level of job insecurity in recent years, but other opinions also exist. Some argue that there has been an increase in job security in South Africa over the last few years, through the measures in the LRA preventing unfair dismissals and discouraging retrenchments, which can be seen as an important social advance (Barker, 2007). Even though different viewpoints exist regarding job security or insecurity for employees in South Africa and how this will influence the level of trade unionism, there is certainly no doubt that unemployment has a negative influence on trade union membership numbers.

COMPARISONS BETWEEN THE EUROPEAN UNION AND SOUTH AFRICA

In the area that follows, a comparison was drawn between the common factors influencing the level of trade unionism in the EU and South Africa.

The first common factor that became apparent was the influence of unemployment on unions. Rising unemployment has had a negative influence on union membership numbers in the EU. Unemployment and job insecurity are also factors influencing unions in South Africa. South Africa's unemployment figure is one of the most alarming features of its labour market (Venter, 2003: 114). As in the EU, high unemployment figures in South Africa also complicate matters in the labour

environment and the opportunity for unions to organise effectively. The bargaining power of trade unions is weakened in times of high unemployment (Vettori, 2007). In most countries of the EU, trade unions offer relatively few services to the unemployed and the consequence is that most trade unionists who become unemployed abandon their union membership. However, in some of the countries of the EU (for example the Nordic countries), union membership remains high irrespective of unemployment figures. This is because unemployment and other social benefits are normally paid out through the unions (Fulton, 2007). In South Africa, trade unions do not have this responsibility and trade union members will normally abandon their union membership when unemployed.

Secondly, in both the EU and South Africa, employment relationships are changing. This tendency was brought about by numerous factors, including globalisation and advancements in technology. The hierarchical power disparities changed between management and employees. For this reason, it became clear in both the EU and SA that union structures need to change to adapt to a new economy, workplace diversity, women entering into the workplace, and a focus shift to competence and capability. Because of the changed work environment, it would seem that employees do not join unions because they feel they can better deal with managers on their own. In the past, the traditional task or function of a union was to express and resolve employment conflict, but it would seem that unions should become more pro-active and provide more than just traditional support to retain members. With the shift in the employment relationship and changes that took place in organisational structures, unions became weaker because of the losses in membership. The reason for this is that it becomes all the more difficult to organise and maintain trade union members. This problem becomes even worse when the effect of globalisation is brought into account. Globalisation makes it more difficult for unions to maintain or receive workplace access and weakens the centralisation of collective bargaining.

The third factor identified was the development of other work relationships outside the traditional employment relationship. In the EU, there has been substantial development outside the traditional employer/employee relationship and contract, upon which a lot of legislation is based. Therefore, unions are unable to provide protection for these workers. In South Africa, on the other hand, legislation protects trade unions to a great extent. The LRA and the Basic Conditions of Employment Act create a rebuttable presumption that a person is an employee unless the employer can provide information to prove otherwise (Basson et al., 2005).

Another example of the protection provided by the legislation of South Africa becomes evident when considering "union security agreements". In South Africa,

agency-shop agreements and closed-shop agreements, also known as “union security agreements”, are an accepted part of employment relations. These agreements are not acceptable in the European Union. The provision of closed-shop agreements is also contrary to national legislation in many of these countries (Vettori, 2005). According to Olivier and Potgieter (1994) as cited in Vettori (2005), the right of freedom not to associate is protected in numerous countries. Kahn-Freund et al. (1983) as cited in Vettori (2005) state that closed-shop agreements have been specifically outlawed in as many of the countries. In Germany and Belgium, for example, closed shops and other forms of union security have been interpreted as being contrary to the freedom of association; that freedom having been interpreted to include the freedom not to associate (Olivier and Potgieter, 1994, cited in Vettori 2005). Furthermore, in the United Kingdom, closed shops are specifically outlawed (Vettori, 2005).

Subsequently, the disclosure of information was identified as a factor that influences trade unions in both the EU and SA. Disclosure of information plays a crucial role in labour relations in most industrialised countries (Van der Walt, 2007). As a developing and newly industrialised country, South Africa has securely anchored democratic ideals in its constitution as well as in its labour legislation (Van der Walt, 2007: 28). Trade unions view information disclosure as a means of furthering their objectives by extending negotiations and joint regulations into areas that were previously the exclusive domain of management (Van der Walt, 2007: 26). The purpose of this is to enable the union to bargain intelligently, to understand and discuss issues raised by the employer’s opposition to the union’s demands, and to administer a contract (Van der Walt, 2007: 27). As in South Africa, European trade unions also regard disclosure of information as a means of broadening industrial democracy (Ballace and Gospel, 1983 cited in Van der Walt, 2007). Most European countries have works council system with statutory provisions for disclosure of information (Van der Walt, 2003, 2007: 26). In South Africa, disclosure of information is also regulated by statutory provisions with both the Promotion of Access to Information Act and section 16 of the LRA (Van der Walt, 2007).

The final aspect identified as a common factor in both the EU and South Africa is the reasons why people join trade unions. The reasons why employees join unions or stay apart from unions vary widely, irrespective of the country they are in. Some labour relation specialists argue that the motivation to become a trade union member in South Africa was in the past politically motivated and now, with a democratic society, the need to belong to a trade union subsided. From the literature studied it seems as if different reasons or motivational factors currently influence trade union membership in

South Africa when compared with the hearty times of apartheid. Furthermore, in the EU, various social, economic and political changes during the 1970s and 1980s (including the fall of the Iron Curtain in 1989) caused insecurity for trade unions and decline in membership over the past two decades. Still, some countries in the EU have high union membership numbers. A possible reason for this may be that employees of these countries (Denmark, Sweden and Finland) see union membership as a natural part of employment combined with the knowledge that unemployment and other social benefits are normally paid out through the unions.

As can be gathered from the previous areas, these are not the only reasons contributing to the level of trade unionism in the different countries studied. The reason why this area focused only on certain factors was because these factors were common to both the EU and South Africa. It should be stated, however, that these factors are by no means more important or less important to trade union trends and all the different factors contribute to the current stance of unions in both the EU and SA.

Conclusion

This article aimed to provide a comprehensive insight into the level of trade unionism of both the EU and South Africa. The reason why the levels of trade unionism were examined was to establish which factors influence these levels of trade unionism in South Africa and the EU respectively. By identifying these factors, comparisons could be drawn between the EU and South Africa regarding trade unionism. These comparisons gave some insight into common factors and factors unique to South Africa.

Numerous factors were identified in both South Africa and the EU. Some of the factors that influence the level of trade unionism, which became apparent during the study, included the influence of:

1. Globalisation
2. Technological changes and advancements
3. Changes in the working environment
4. Legislation or statutory influence on the labour relationship
5. Unemployment and job insecurity
6. Employees perceptions of the role of trade unions
7. Resistance of some employers to trade unions in the workplace

The comparisons that were drawn concerning the factors influencing trade unions of the EU and South Africa dealt exclusively with common factors of both the EU and SA. Even though similar factors exist in both the European

Union and South Africa and these factors have similar influences on trade-union levels, the literature also indicated unique influential factors for both developed countries, such as the EU countries, and a developing country such as South Africa.

An interesting occurrence that emerged in the literature was that different labour relations experts have conflicting viewpoints of the influence of certain factors on the level of trade unionism in a country. One example of this was the influence of globalisation on trade unions. Some optimistic experts believe that globalisation holds numerous opportunities for trade unions, while more pessimistic experts believe that it could threaten the future of trade unions as organisations. Moreover, certain factors that were highlighted in the literature indicated recent tendencies in the trade union movement, but it remains unclear what the influences were or will be on the level of trade unionism.

This study does contain some limitations, however, which need to be highlighted, because these limitations can offer insight for possible future research. Even though thorough comparisons were drawn between the EU and South Africa and definite influential factors were identified that gave significant insight into the level of trade unionism in both developed countries and a developing one, it may not be enough. To ultimately establish what factors are the most critical in South Africa, one should also compare this country, which is a developing one, to other developed countries besides the European Union countries, for example the United States of America. Another possible study could be between countries with similar developmental status or political background to South Africa. This may provide other perspectives of influential factors on the levels of trade unionism, which did not become apparent during this research study.

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