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Consumers and the State since the Second World War

By
MATTHEW HILTON

In the twentieth century, consumption became a political project intimately bound up with the state. By the 1950s, governments across the world worked to promote a vision of consumer society based around access and participation—affluence for all—rather than choice and luxury for the few. This vision of consumerism was tied in with the geopolitics of the cold war but was also constitutive of other globalizing trends that connected not only Western Europe to North America but also both sides of the Iron Curtain as well as the global South and North. The article analyzes the development of, and compares the differences in, the various consumer protection regimes that emerged in the latter half of the century. It points to processes of convergence in consumer politics across the globe that saw the development of consumer political thinking in the Soviet bloc and the development of supranational protection regimes at the European level. In more recent decades, the politics of consumer society based upon access and the collective has been eclipsed by a politics that emphasizes choice and the individual. Such a change represents a profound shift in the relations between consumers, citizens, and governments.

Keywords: consumerism; consumer protection; regulation; citizenship

In the 1950s, a new consumer movement emerged based on the comparative testing of branded commodities and the promotion of a “best buy” in subscription-based magazines. Beginning in the United States in 1936 with the formation of the Consumers Union, organized consumerism spread to Europe in the period of

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postwar reconstruction and the emergence of the affluent society. Modeling themselves directly on their U.S. counterpart, several organizations were created in Europe in the 1950s. The activists associated with these groups liked to imagine themselves as the vanguard of a new consumer movement. In many cases they were, but if a global dimension is taken what becomes clear is that comparative testing constituted only one aspect of a broader politicization of consumption in the postwar period.

A whole range of organizations participated in a defense of the consumer in the decades following the 1940s. Elected politicians promised shoppers a better life just around the corner, constructing welfare regimes that guaranteed basic standards of living for all. State officials liaised with consumer experts in the media and in women's and housewives' organizations to develop informative labeling schemes. Business associations worked in conjunction with consumer representatives to develop quality certification marks. The cooperatives continued their campaigns against the abuses of the marketplace by trusts and cartels. And the trade unions continually sought regulatory solutions to some of the perceived inequities of capitalist development.

The significance of the 1950s as a key moment in consumer politics was the growth in interest in affluence as well as necessity. The advocates of the consumer society sought not only to protect the poor but the insecure rich as well. Consumer society was being held before citizens as the way forward for all. It is of no surprise, therefore, that seasoned campaigners against consumer injustices were revitalized in this period alongside the testing magazines of the new organized consumer movement. And it is also unsurprising that comparative testing did not enter an empty institutional arena. The renewed attention to the consumer was conducted through established frameworks of politics and economics, which meant that the consumer protection regimes emerging in the affluent society were incredibly diverse. For all the promotion of the free market promoted by the Marshall Plan, therefore, the new consumer society found itself open to question by a wide variety of consumer activists and prone to the different regulatory traditions and practices of each legally bounded nation.

This article sets out the full range of consumer politics operating in industrial capitalist societies after the Second World War. It captures the diversity of a consumer movement that states responded to—and helped construct—in a variety of ways. As the protection of consumers became a key political battlefield across the society being built in their name, different consumer protection regimes emerged. Many of these reflected the existing political economic framework of each state, and important comparisons can be made between certain ideal types: pluralist, corporatist, social democratic, individualist, and so on. But what is also apparent is the remarkable degree of convergence in consumer protection systems. States analyzed and copied the consumer protection measures of other states. They put forward best practices to serve as the benchmarks for different societies and economies. Particularly at the European level, they ultimately developed supranational consumer infrastructures, which overrode many of the particularities of nation-specific consumer measures.

This all suggests a response to the consumer interest far more complicated than either a direct reaction to the rise of comparative testing, a cheap political ploy by government ministers to maintain their popularity, or the imposition of an American-modeled market economy upon Europe and elsewhere. Instead, it suggests that consumer society was an amorphous entity in which many organizations had an interest. As the consumer became a universal category, it was inadequate to merely champion the rights of one consumer over another. Consumerism as a political project had to be seen as offering something to all consumers, rich and poor alike. The affluent society had to promise more choice for those who could afford it, but also more stuff for those who so far could not. In the consumer societies built after the war—and in the protection regimes established to look over them—a broad-ranging consumer politics aimed to bring everybody within its grasp. At this moment, consumption became an activity that was potentially democratic, universal, and open to all.

The emergence of organized consumerism in the 1950s owed its existence to several different trajectories of consumer organizing. When consumer representatives began to obtain a voice in state bureaucracies, governments cultivated the support and involvement of a whole variety of movements. The cooperative movement had a strong claim to being the oldest, most established, and most successful consumer organization over the previous century. Although weakened in many countries after the war, where it remained strong, as in Scandinavia, it could claim a prominent voice as the foremost representative of the consumer (Furlough and Strikwerda 1999; Theien 2006). But the trade unions and the labor movement more generally also played a prominent role in consumer advocacy, both before and after the war. Indeed, in Austria, the principal consumer testing organization owed its existence to the labor movement as the Austrian Trade Union and the syndicalist institution, the Chamber of Labour, created the Association for Consumer Information in 1961 (Thorelli and Thorelli 1974). Women's groups too built on decades of consumer protest: through organized consumer leagues protesting over labor conditions, through street protests against shortages in two wars, and in representing consumers in home economics councils, housing committees, and cost of living surveys. As economies were rebuilt in the 1940s, these women's groups dominated many consumer movements. In Japan, the politics of consumption was spearheaded by various federations of housewives' associations, while in Europe women's organizations assisted in the formation of new consumer initiatives and women journalists made consumer issues important public causes (Maclachlan 2002).

Twentieth-century governments have maintained a complex set of relationships with these organizations of the consumer. On one hand, grassroots consumer groups have existed independently of any state funding and have constituted pressure groups similar to other social movements. On the other hand, many have been sustained and nurtured by public finances and have been incorporated within—or emerged from—the institutions of the state. But what is clear is that consumer protection had become a state project, no matter that consumerism was often molded to fit existing national political economies. Unlike in

previous centuries, when consumption could serve mainly as a theoretical and practical rallying point for economists and consumers, in the twentieth century, consumers were recognized as political entities to whom governments must respond: defending the consumer-citizen and working to protect his or her standard of living, while offering rewards in the future, became a typical populist manifesto of politicians of all persuasions.

Government intervention in consumer affairs began with the food and drug regulations of the late nineteenth century, followed by the curbs placed on trusts, cartels, and monopolies shortly afterwards, especially in the United States (Goodwin 1999; Nadel 1971). In two world wars, rationing and supply controls meant states were forced to listen to consumer concerns, and bureaucracies catering to consumer interests were established. The mobilization of the state around issues of consumption created opportunities for those who saw in the consumer a citizen around whom modern welfare regimes could be built. In the United States, for instance, liberals such as John Kenneth Galbraith and Lewis Mumford were attracted to institutions such as the Office of Price Administration because they saw in these state interventions a more social-democratic citizenship and one that satisfied their moral, protestant-inspired dilemmas over abundance as it urged frugality and “chastened consumption” in the present in order to enjoy indulgence in the future (Horowitz 2004). While many of these institutions were fiercely opposed, not least by big business, wartime state consumerism offered a “fair shares” politics of consumption that was attractive at the ballot box in the subsequent years of austerity and reconstruction (Zweiniger-Bargielowska 2000).

Following the Second World War, consumer society was championed as the bright future to which the ravaged economies must direct themselves. Through greater state spending on infrastructure, the expansion of credit facilities, the encouragement of home ownership in the new suburbs, and the creation of personal opportunities symbolized by the GI Bill (Serviceman’s Readjustment Act) in 1944, all Americans were being invited to participate in the “consumers’ republic” (Cohen 2003). Arguably, this model of an all-embracing consumer culture was exported through the Marshall Plan, but Roosevelt’s “freedom from want” was mirrored in Beveridge’s welfarism in Britain and in social democracy more generally in Europe (Donohue 2003). The sociologist Jean Fourastié elaborated upon a long-standing commitment to planning in French political economy, extolling the virtues of consumption as a civilizing process that would drag citizens from older modes of living to what he described the thirty years between 1945 and 1975 as: *les trente glorieuses* (Boulat 2005). In Germany, the social market economy espoused by the minister of economics, Ludwig Erhard, presented its own model of a future consumer society. He embraced an alliance with consumers in the rebuilding exercise, creating the Working Group for Consumers Unions in 1953, that drew on the existing expertise provided by the women’s and cooperative movements. Riding the crest of the economic miracle, Erhard was able to claim no narrow vision of a consumer society; instead, he was able to announce “prosperity for all” (Landsman 2005).

This rhetorical construct of a future consumer society shared and participated in by everybody contrasts with a spirit of consumerism concerned solely with

individual choice and acquisition. If *consumer democracy* as a term is perhaps only truly applicable to the United States, so all-pervasive was the idea that state policy, mass consumption, and universal standards of living were bound up with one another that the rhetoric crossed the Iron Curtain to the Soviet bloc. Even Stalin spoke of the need to pay attention to the production of consumer goods and, according to the most thoroughgoing study of twentieth-century consumer economies, the cold war became a “struggle over which system more effectively satisfied standards for the good life, with each spelling out, in opposition to the other, a definition of mass consumption suited to its resources and legacy of development” (de Grazia 2005, 344). The two competing cold war ideologies almost literally clashed in the kitchen at the Moscow Trade Fair in 1959. U.S. Vice President Richard Nixon and Soviet premier Nikita Khrushchev, walking around the model homes exhibited in the American display, engaged in a teasing dialogue about the relative merits of capitalism and communism in bringing more goods, better homes, and higher incomes to more and more people. Across both sides of the Iron Curtain, therefore, it seemed the expansion of consumption and the promotion of consumer society to everybody were defining features of the role of the modern state.

This rhetorical construct of a future consumer society shared and participated in by everybody contrasts with a spirit of consumerism concerned solely with individual choice and acquisition.

If standards of living were to be increased for everybody and the society of the consumer was to be brought to all, then it also stood to reason that politicians had to respond by offering shoppers some protection in this unknown age of affluence. The new regime of the shopper was not one where consumer sovereignty was to be the model for avoiding the perils of unwise purchasing. If consumers were to behave with confidence, providing the impetus for economic growth and making all the improvements in technology and productivity worthwhile, then they required assistance and support. They needed to be assured that their spending would result in greater utility for themselves and their families. They needed to know that in borrowing heavily to purchase a car, a house, and all the furniture to arrange inside the house, they would not lose everything if the house were found to be shoddily built, the car broke down on every trip, and the appliances

bought for the home harmed those who switched them on. As firms grew in size and complexity, increasing the distance between the consumer and producer, citizens needed to know that constraints and curbs would be placed on businessmen's behavior; that capitalism would be kept in check; and that somehow, if not through the authority of choice but the authority of government, the market would still serve the interests for those it claimed to exist.

As affluence arrived, governments around the world attempted to develop regimes of consumer protection to provide consumers with the confidence to enter and participate in the market. While states responded in different ways, what must be emphasized above all is that from the 1960s and especially in the 1970s states did respond: it is with good reason that many consumer activists look back on these decades as the time when they achieved many of their greatest successes. The growth in consumer protection measures was simply incredible, sweeping aside many of the rudimentary consumer representative systems developed during the 1930s and 1940s and replacing almost entirely the now seemingly rudimentary regulations enacted at the end of the nineteenth century. In Germany, just 25 new laws were enacted relating to consumer protection from 1945 to 1970, but a further 338 were adopted by 1978. Similarly, in France, just 37 laws and ministerial decrees came into effect before 1970, a total that had grown to 94 by 1978 (Trumbull 2006a). In Britain, major laws relating to consumer safety, hire purchase, resale price maintenance, and trade descriptions appeared in the 1960s, followed by wider regulations on fair trading, credit, and unsolicited goods and services in the first half of the 1970s (Hilton 2003). In the United States, a flurry of consumer protection laws appeared in the late 1960s relating to the automobile industry, drug safety, meat quality, package labeling, credit reporting, product safety, and a whole host of other trade practices (Mayer 1989).

Moreover, these specific legislative remedies to market abuses were backed up with the creation of entire bureaucracies devoted to protecting the consumer. Across Europe and the United States, official institutions appeared that provided information to consumers about products, the operation of the market, and their rights within it. Various types of consumer councils emerged that drew on the grassroots consumer movement but that also utilized their own resources to represent consumers in various ministries that touched on consumer affairs. Some specifically dealt with consumer complaints, taking companies to court on behalf of individual shoppers or consumers as a whole in class action suits. Ombudsmen, trading standards officers, and weights and measures inspectorates were all expanded at national, regional, and local levels to watch over more disreputable manufacturers and traders. Standards institutes and official quality certification schemes were either controlled by the state or else heavily funded from the public purse. And codes of practice, regulatory watchdogs, and independent councils were established to monitor specific aspects of the market, such as advertising, financial services, and the utilities, whether supplied by nationalized industries, municipal authorities, or private corporations.

The most meaningful attempt at comparison so far has been carried out by a political scientist. Gunnar Trumbull has illustrated three broad models of consumer

citizenship. First, an economic model of citizenship has regarded consumers as partners in the economy, such that the challenges facing them are the consequence of market failures and imperfections, be they information asymmetries or the inequities emerging from the abuse of monopolistic power. The solutions sought have therefore revolved around strengthening existing market mechanisms and ensuring the consumer can behave as predicted by economic theory. To some extent, this model has dominated consumer protection policies in countries such as Germany, Britain, Austria, and Japan. In the Scandinavian countries, however, a more “associational” model of citizenship has been pursued, whereby consumers have been regarded like other legitimate social interest groups. Rather than finding protections within the market, then, consumers have been given the right to participate in forums dealing with overall structural issues. Having made the assumption that consumers and producers share many interests, associational citizenship seeks to create mechanisms through which different interests can negotiate with one another on an equal footing. Finally, a model of political citizenship emphasizes the rights of consumers and recognizes their roles as sociopolitical actors. Since consumers are not solely economic beings, they ought to be protected from the risks and uncertainties with which only professionals are usually able to cope. To some extent, this was adopted in France and the United States and is dependent upon the existence of a highly mobilized and vociferous consumer movement to which governments are prepared to respond (Trumbull 2006b).

But if these models of citizenship serve as rough categories, they have also been tempered by the existing political and legal structures in which new consumer protection measures have had to be situated. While Trumbull (2006b) found consistency across the Scandinavian countries in their pursuit of an associational model of consumer citizenship, other consumer protection regimes have been influenced by existing policies that determine the role of the producer in the economy and the state. Within the economic model, therefore, Britain has largely sought more market-based solutions, while Germany and Austria have adopted more corporatist consumer-producer mechanisms. In Japan, the consumer has also had to fit in with a strong state and the existence of great producer political power at the center. Similarly, while France and the United States have regarded the consumer as a political entity, the United States has sought, as did Britain, market-based solutions to their grievances, while France, though sporadically and through much experimentation, has mobilized statist mechanisms to protect the consumer. The models of citizenship have just as often served as ideal types for the range of institutions and individuals seeking to speak for the consumer in any one location. This has resulted in much borrowing from one another and the existence of many consumer protection measures that seemingly typify the style of a more general regime identified in another country.

The Scandinavian experience has been most frequently invoked in discussions over consumer protection. The state moved early in its intervention into consumer affairs, incorporating the existing strands of the consumer movement into the official institutions of the state. For instance, in Denmark, the government

Home Economics Council was established as early as 1935. In many ways, these early state interventions have made the need for an independent consumer movement less apparent. In Sweden especially, the state has taken over many of the roles elsewhere performed by private groups. In 1951, the Institute for Informative Labelling was established, which has set out product standards that firms have adhered to, guaranteeing consumers information about the commodity and certain minimum levels of quality. In 1957, the Swedes also created the State Consumer Institute, which has undertaken the testing of goods. Sweden pioneered the use of the Consumer Ombudsman in 1971 (followed by Norway in 1973, Denmark in 1974, and Finland in 1978), which has mediated disputes between consumers and business, helping to develop binding agreements on trade associations over such matters as advertising standards and standard contract terms. And its Market Court has served to manage consumer legal cases brought by the Ombudsman on behalf of consumers. The availability of this legal tool has strengthened the power of the Ombudsman to an extent far greater than in similarly conceived systems elsewhere, although the availability of class action suits in countries such as the United States provides an alternative model for seeking redress for many consumers as a collective (Theien 2006; Thorelli and Thorelli 1974, 1977).

Sweden's associational system is mirrored in the more obviously corporatist systems of Austria and Germany. In the latter, the Alliance of Consumer Associations has negotiated with producers and other interests in a whole variety of committees and institutions across several government departments. Ostensibly, it operates on an equal footing with other economic interest groups, but in reality it has meant that consumer protection in Germany has become geared toward more technical issues, seeking to work with manufacturers to ensure that problems with products are resolved before they enter the market (Trumbull 2001; Consumers International 1995). The corporatist structure in Japan, too, has also largely weakened the impact of consumer protection, thanks to the greater entrenchment of producer interests within the central state bureaucracy. Japanese consumer groups have not been able to challenge the political power of producer groups, and indeed many have argued for measures that support the manufacturers: thus, "a disproportionate amount of their criticisms of business are criticisms of the practices of foreign businesses" (Vogel 1992). By arguing for greater food standards and self-sufficiency in agriculture, for instance, Japanese consumers have actually fought against their own immediate economic interests, which could be served by cheaper imports. However, when there have been divisions and disputes in national politics, Japan's highly mobilized consumer movement has often been able to achieve notable successes (such as the Product Liability Law in 1994), and its relationship with government has been marked less by co-option and more by conflict (Maclachlan 2002).

Care must be taken in seeking to classify consumer politics in any one country, especially if a focus on government initiatives, regulations, and institutions masks the history of conflict often bubbling under the surface, conflicts that often go to the heart of the definition of a consumer. In Germany, the producer bias of

the corporatist framework has resulted in a system that privileges better information for the individual. Consumer protection remains largely market oriented as a consequence. In Britain, the model of the consumer that has largely won out is that of an economic being, to whom more information ought to be presented so that he or she can make better individual choices. Arguably, this model was enshrined in the legislation following the Report of the Molony Committee on Consumer Protection in 1962, in the Office of Fair Trading in 1973, and in the privatization schemes and their regulatory shadows from the 1980s. Yet activists also presented the consumer as a social being, to whom states and businesses should respond, ensuring that not only individuals but also consumers as a collective be provided with basic goods and services as well as with access to all the sorts of information and resources crucial to the exercise of good citizenship.

Likewise, in the United States, care must be taken in identifying consumer protection solely as a market-oriented, individualistic regime. Certainly, the primacy of the market cannot be denied, nor the faith held in it as a solver of consumer problems. But American consumer politics also embraces other forms of protection. Because the individual consumer is also a rights-based citizen, these rights politicize his or her actions in a manner distinct from the associational tendencies of Scandinavian social democracy. Thus, in the late 1960s, a regulatory framework emerged in the United States often far more rigorous than that achieved in European economies. Consequently, regulatory agencies such as the Federal Trade Commission and the Federal Energy Administration were strengthened, and new agencies such as the Environmental Protection Agency, the Occupational Safety and Health Administrations, the Consumer Safety Commission, and the National Highway Traffic Safety Administration were launched (Nadel 1971).

It is important not to classify too rigorously the consumer protection regime of any one country. States have learned and copied from one another, resulting in ad hoc measures that, collectively, betray the ideal types of many different consumer protection systems. Furthermore, over time states have changed their policies and adapted consumerism both to the demands of the consumer movement itself and the more general ideologies of the political party in power. In France, for example, a strong central state has enabled many experiments in consumer protection. Initially, the limited resources of the National Consumption Committee, created in 1960, matched the powerlessness of the British Consumer Council rather than anything seen to exist in Scandinavia. Following the lead taken by the German Stiftung Warentest and the relative weakness of French comparative testing organizations, the government created the National Consumption Institute in 1967, which soon began publishing results of its own tests as well as advising on a much broader range of issues. In the 1970s, a model of consumer protection based on representation and corporatist negotiation began to appear following pressure from a highly motivated and better resourced grassroots consumer movement. A secretariat of state for consumption was established in 1976, and a flood of consumer protection acts began to appear. The Socialist government quadrupled funding to consumer protection and attempted

to place consumers on an equal footing with producers, ultimately culminating with the establishment of a full Ministry of Consumption in 1981. Although these initiatives were eventually scaled back, the centralized state of France created a framework for the establishment of the consumer as a highly politicized aspect of citizenship (Chatriot 2005).

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So much of consumer protection owes as much to the efforts of consumers as it does to government. It is difficult to reduce the characteristics of protection regimes solely to the political economic context of each individual state. In Britain, for instance, the existence of an extremely impressive private comparative testing magazine has partially excused the state from taking on an advocacy role for consumers. Likewise, Consumentenbond in the Netherlands has also enjoyed an extremely impressive popularity among Dutch consumers, perhaps ensuring the dominance of an information-based model of consumer protection. Had Consumentendbond's magazine, *Consumentengids*, not penetrated so many Dutch households, then the state may have been forced to step in on behalf of consumers to a far greater extent than it did. And if consumer protection is broken down into its constituent parts—into advertising regulation, trade descriptions, price controls, and so on—then ever-greater disparities from national norms emerge. The point is, therefore, less that rigid differences can be determined from cross-national comparisons but that consumer protection had become an international phenomenon from which states learned from one another and adopted measures that took best practices from different contexts. The most important point about consumer protection is not that it was implemented in different ways throughout the world but that consumer protection existed at all.

Consumer protection was clearly an international trend, appearing in liberal capitalist, mixed, and social market economies. As many of these systems were fundamental to the pursuit of the cold war, consumption also became an aspect of a broader geopolitical framework. In many ways, the Soviet bloc had to be seen to be responding to the U.S. pursuit of the standard of living, but members of communist bureaucracies were also influenced by international developments in consumer protection. In this regard, the consumer movement and consumer protection were global trends that cut across cold war politics pointing to alternative

narratives of globalization within contemporary world history. Posited as a neutral political movement, consumerism avoided a polarization across the ideological divide and instead served to harmonize and globalize consumer protection regimes behind the scenes of any such controversy of the kind found in Nixon and Khrushchev's kitchen debate of 1959.

Undoubtedly, consumption did play a role in the cold war. While both sides pursued the goal of greater standards of living and the provision of necessities for all, ultimately capitalism proved more effective at providing comfort and luxury than the command economies of the Soviet bloc. The communism of the party-state failed to either predict or satisfy consumer wants even after several decades of industrialization and economic planning (Bryson 1984; Steiner 1998). Yet advocates of consumer protection emerged within economic planning departments. In East Germany, leaders had to contend with the Soviet emphasis on production goods while acknowledging that many of their citizens looked favorably upon the new prosperity being enjoyed in the West. A distinct consumer lobby emerged in the 1950s in the Ministry for Trade and Provisioning, which found expression in specialized journals dealing with domestic trade and which developed "a language and a set of goals aiming toward building a more articulated consumption regime, toward a wider and richer array of consumption offerings" (Landsman 2005).

Within the confines of the German Democratic Republic, though, the consumer lobby was never able to enjoy a persistent power base or a sustained role in the planning of consumption. But in more open societies, a fuller recognition of the consumer could take place. Yugoslavia had, perhaps, the strongest tradition of consumer protection stretching back to 1957 and the state-run Federal Board of Family and Households. In 1969, this was reorganized to become the Association of Consumers, a state-funded but reasonably autonomous body with the remit to encourage better quality and lower-priced products (MacGeorge 1997). Later, other communist countries were known to take advantage of the worldwide consumer movement. In China and Cuba, consumer organizations were created from above as deliberate means to contain the political ill will of consumers in an economy of shortages. Yet in more liberal or reformist regimes, the commitment to the consumer was genuine. In countries such as Hungary, experiments were conducted in decentralization and "marketized" socialism, while more foolhardy borrowing from Western governments took place to increase imports to satisfy consumer demand. As a wider commitment to liberalization, a more grassroots consumer organization even emerged in Hungary in 1982 as an offshoot of the Patriotic People's Front, an umbrella for various civil movements (Kozłowski 1992).

In Poland, as in East Germany, the party-state followed the Soviet productivist model, which occasionally paid lip service to the consumer but which ultimately focused on the dictates of production. However, consumption could nevertheless be an important focus for broader political grievances, and many of these concerns were taken up by a consumer lobby within the Institute for Domestic Trade and Services from the late 1950s that also looked to learn from the consumer protection regimes of the West. During the later stages of Polish communism, this

consumer lobby was able to transform itself into a more genuine consumer movement. Amid the events of the early 1980s—those associated with Solidarity—a more independent form of consumer activism emerged. The Federation of Consumers (Federacja Konsumentów, or FK), established in 1981, was neither an official arm of the state nor the product of ordinary forms of consumer interaction with the world of goods. It was an association of experts drawn from the civil service and the professions and that bore much in common with the increasingly professionalized nongovernmental organizations and new social movements of the West. The concerns and interests of the consumers attached to FK were no longer focused solely on improving consumer supply under a command economy, but were adapted also from an emerging global discourse of consumer rights and protection to which they, as educated professionals, had access. It reflects the extent to which the experts of FK behaved not as cold war warriors, championing one ideological system over another, but as an intermediary cohort of citizens concerned with the condition of their society and economy from a perspective influenced by the international exchange of consumerist thought. Their work points to the growing internationalization of consumer protection and organized consumerism that traversed established divisions of twentieth-century history (Hilton and Mazurek 2007).

Indeed, the twentieth century witnessed a harmonization of the language of consumer protection. For instance, the standardization movement facilitated trade and commerce while also offering basic protections for consumers. National bodies formed at the beginning of the twentieth century came together in 1947 to create the International Organization for Standardization. Such bodies have been tied into broader process of westernization and even Americanization. The Organization for Economic Cooperation and Development (OECD), for example, began as a facilitator of the Marshall Plan in 1948 and has subsequently become an important focal point for the communication of consumer protection measures. The OECD's Committee on Consumer Policy has reviewed measures undertaken in member states on an annual basis, also providing ten-year summaries that act as reference guides for those wishing to learn about what has been enacted in other contexts. It has helped bring a convergence in consumer policies by focusing member states' attention on common goals particularly, for the OECD, in developing global markets to increase consumer choice (OECD 1995).

But harmonization of consumer policy has also come through the intervention of supranational bodies concerned with the regulation of trade and markets. Resolution 543 of May 17, 1973, by the Council of Europe established a Consumer Protection Charter, based around the five established consumer movement concerns of protection, redress, information, education, and representation first articulated by President Kennedy in the United States. This paved the way for the first Programme for Consumer Protection in 1975, which directed European consumer policy in subsequent decades. The modifications and additions made in the second program in 1981 did not detract from the underlying rights-based spirit, and no substantial changes were made under the

Single European Act of 1987 that led to the consolidation of the internal market. Indeed, the third consumer program of 1986, *A New Impetus for Consumer Protection Policy*, was couched within the broader objective of the internal market, and if anything, the rhetoric of rights was toned down as greater competition and choice were held to offer the main protections to the consumer (Weatherill 1997; Commission of the European Communities 1986; Consumers in the Europe Group 1999).

The supranational framework provided by Europe both harmonized consumer protection and narrowed it as a concept. European codification of consumer law amid a process of economic integration has ensured that individual member states have adopted protection mechanisms pioneered in other countries. It has meant that Europe has had a tremendous impact on national consumer protection regimes, ensuring that the differences between countries such as France and Germany have been blurred. It has also meant that in those states where consumer protection was weak or underdeveloped, such as Greece, Spain, Italy, and Portugal, a ready-made model for consumer protection has been provided. But increasingly, that model of consumer protection has been dictated by the wider goal of market reform, ensuring that consumerism as a regulatory regime has been diluted if not replaced with a notion of consumerism emphasizing choice, competition, and ever-expanding markets.

European consumer policy therefore followed a largely information-based approach, whereby consumers were protected through the provision of better information, making them more efficient and rational and, in turn, improving the operation of the market (Hadfield, Howse, and Trebilock 1998). Ultimately, their interests were seen to lie in more choice and expanding markets, rather than the greater supply of public goods, a more equitable distribution of commodities, or the ability of all consumers to participate on a more equal footing. Admittedly, as in the United States and throughout the OECD, extremely strong regulatory protections were made available on matters of consumer safety and food sovereignty, especially as witnessed in the reactions to bovine spongiform encephalopathy (BSE, or mad cow disease) (Vos 2000; Ringstedt 1986). But generally, harmonization of consumer protection policy was attendant with a reduction to the lowest common denominator. While different traditions of consumer activism and the political-economic structure of an individual state might therefore have created very different consumer policy regimes across America, Europe, and the Pacific region, the work of supranational bodies such as Europe served to override these differences. And they did so by positing the most global of consumer interests—choice—as the main target of consumer protection. The Europe of the 1990s therefore reflected only one aspect of the vision of consumer society held by those who sought to reconstruct Europe after 1945. As consumer protection regimes first came into existence, there had been a concern to ensure all were protected, with protection meaning access as well as choice. By the 1990s, Europe had much less to say for those who could not actually afford choice.

The consumer society being built by states at the end of the twentieth century was very different from that which had driven reconstruction in postwar Europe.

In the 1950s, politicizing consumption came to be as much about access to affluence as it was about choice for those already enjoying comfort and luxury. Particularly after the Second World War, consumption offered the basis for a new social contract for populations eager to move forward from the austere environment of deprivation and devastation. No matter that the critiques of commodity capitalism persisted and the liberal left remained uneasy with an amoral acceptance of luxury, the consumer societies created in the 1950s steered their public toward an area between necessity and luxury, hunger and excess: a mass consumption, comfortable, affluent middle ground that all could enjoy.

But as states responded to citizens as consumers, consumers themselves were acknowledged to be an incredibly diverse entity. Standing in as substitutes for the public, consumers were as varied as society itself. Very different overall systems therefore came into being in Europe, America, and the wider world. These did not all follow the consumer democracy of the United States; nor did they agree on the definition of the citizen supposedly at the heart of consumer society: he or she could be a social democratic participant in civil society; a co-opted interest within a corporatist structure; a utility-maximizing individual eager to improve his or her own well-being at one and the same time as the efficiency of industry; or a highly politicized rights-seeking individual capable of making demands of, and gaining intervention by, successive governments in the marketplace.

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For all that the organized consumer movement might like to see in twentieth-century consumer protection a progressive narrative of success built upon success, these great differences in the models of the consumer-citizen warn against such a history. Consumer activists have often liked to argue that their heyday was in the 1960s and 1970s; if they have declined as a political and social force thereafter, it is due to their having achieved many of their own goals. To some extent, they have a right to be so contented. Compared to the fledgling technocratic age of the 1950s, commodities no longer break down as soon as they are taken home, guarantees and standard contracts ensure that forms of redress are available to dissatisfied customers, advertisements might well continue to exaggerate but there are restrictions on overtly false claims, sources of information are available to shoppers other than those provided by the manufacturer or retailer, and most dramatically, the danger of death and injury from negligently assembled products has declined.

Yet in all the measures that have been successfully implemented, there has also been a narrowing of the vision of consumer protection. As states have borrowed best practices from one another, or avoided the mistaken experiments conducted by each other, consumer protection has become harmonized. However, as the European experience demonstrates, this harmonization has taken place around narrowly defined rights to choice and ever-expanding markets. These were crucial elements of the demands of so many consumer groups, but they were not all. Consumers and states had imagined a consumer society open to everybody, in which all could participate and in which all could operate fairly. These were the driving factors behind many of the consumer protection measures introduced just as the affluent society was coming to fruition. They were designed to ensure that protection existed so that every citizen could enjoy the good life.

But in the later focus on choice, protection became unevenly distributed. Those who can afford to choose alternatives, can bear the costs of deceptive practices, and can simply live to spend another day have their own protection mechanisms. But for the poor and disadvantaged, access to such protection is less readily available, and their participation in consumer society comes at a struggle and a cost. This runs against the internationalist vision of consumption promoted in the postwar years when, at the height of the cold war, the advocates and practitioners of communism and capitalism argued the relative merits of each system in bringing more goods to more people. Particularly since consumer society has continued to have a global remit, stretching beyond the industrialized nations of the world and toward Southeast Asia, Latin America, and ultimately Africa, these aspects of consumption have remained crucial. But if the definition of the consumer was restricted to choice, then the implications for less developed countries could be profound. The difficulties faced by consumers in the developing world could be very different from those faced by the affluent, but the solutions that have come to be proposed have not emphasized the same rights to access, participation, and improved standards of living as those that defined the consumer societies of Europe and North America in the 1950s and 1960s.

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