#### - Chapter 10 -

# STANDARDIZING RESPONSIBILITY THROUGH THE STAKEHOLDER FIGURE

Norwegian Hydropower in Turkey

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Oslo 1979: Facing strong opposition to the planned Alta power plant in northern Norway from the local Sami minority population as well as environmentalists nationwide, one of the Statkraft managers wrote in the agency's internal journal that he had "a strong belief in personal contact. We ought to pursue far more active information through for example schools, youth organizations, mass media, and other channels. ... It also seems evident that our organizational structure is not adequately prepared for the demands presented by our surroundings. If we are to succeed, we must find ways to cooperate with watercourse user groups to a larger extent than we have previously."

Istanbul 2015: Statkraft was hiring a new Turkish CSR officer for their large construction site Çetin in southeast Turkey—a project that confronted a variety of challenges, including political conflict among impacted communities. In reviewing candidates, they were looking for someone familiar with international standards: "We already have a guy who can drink tea with the locals."

Why would even the most everyday interaction with local realities in rural Turkey in 2015 require knowing international standards, while management had not considered international standards when searching for new ways to do things in Norway back in 1979? In the short time span from the mid-1980s to around 2000, Statkraft went through momentous change, from being a Norwegian state agency to become a transnational corporation in pursuit of profit (see table

0.1 in the introduction to this volume). This change also implied a shift from rule-based governance to state "expectation" that corporate social responsibility (CSR) practice should be guided by international standards.

These two vignettes are suggestive of two major trends during the last couple of decades: corporatization and internationalization of economic activity, and the increasing degree to which the practice and language of CSR has become informed by and embedded in a multitude of international guidelines. These two trends are related: as governments lose control over capital, ameliorative soft governance is sought through international voluntary frameworks. How do these changes affect the way in which responsibility is handled by corporations? We pursue this question through a multisited study of Statkraft, a particularly "responsible" renewable energy corporation, owned by the Norwegian state. Being a fully state-owned company based in a Nordic corporate context raises the additional question of whether this makes a difference to the way in which the corporation relates to CSR standards and reporting. To what extent does the Nordic model inform Statkraft's practice of CSR in Turkey?

This study focuses on Statkraft's engagement in Turkey and the way in which they practice CSR. We have had longitudinal interaction from 2013 through 2018 (mainly but not limited to meetings) with staff at HQ in Oslo and local CSR staff in Turkey, as well as meetings with a range of persons who interact with Statkraft. Further, we have conducted ethnographic fieldwork in local communities in Turkey and surveyed corporate and government documents, relevant internet sites of the corporation, and international performance and reporting standards. Taking a multisited approach to the application of standards in Statkraft's work has enabled us to see beyond the tension between reality versus corporate presentation and to explore the multifaceted nature of CSR within and at the fringes of the corporation.

While CSR was once considered to be voluntary acts of "doing good," corporations now try to integrate social and environmental issues in risk management and decision-making systems, in performance standards, and in standardized reporting frameworks intended to ensure transparency and accountability (Shabana et al. 2017; Welker 2014). Critics—academics and activists—claim that, rather than securing transparency, the use of global standards, especially for reporting, tends to misrepresent or mask the way in which corporations perceive and act on local realities, to the extent that the standards organize, bureaucratize, and depoliticize the impact the

corporation has on the world (see, e.g., Garsten and Jacobsson 2011). Taking the Global Reporting Initiative (GRI) as her prime example, Sally Merry concludes that "indicators produce readily understandable and convenient forms of knowledge about the world that shape the way policy makers and the general public understand the world ... and new opportunities for governance through self-governance" (Merry 2011: 92–93).

This critical argument comes with several interrelated assumptions that may be problematic. First, it is largely based on a Foucaultinspired critique of neoliberal governance techniques (see the commentary in the introduction to this volume), which makes overly broad brush by incorporating into the narrative of a global neoliberalism ways of governance that have independent trajectories and are developed for aims other than "marketization of everything." It may also make overly strong claims about the effect of neoliberal governance, such as the inducement of "self-governance." Second, most of the literature on CSR, including studies of CSR as governance and in-depth ethnographic studies (e.g., Welker 2014; Rajak 2011) develop their arguments based on the assumption that corporations are privately owned shareholder firms. There is a certain Anglo-American bias to this literature that makes it hard to consider other possible "economic-institutional ensembles" (Foucault 2008: 167). For instance, Nordic state-owned corporations do not necessarily conform to the Anglo-American model. Third, the argument presupposes that we accept that corporations are unitary, that they consistently apply international standards throughout their organizations, and that standards actually work (for a critique, see Welker 2014). What does the use of performance standards and sustainability reporting really "do" for the corporations? It has been argued that an important character of standards is that they are "always already incomplete and inadequate" (Star and Lampland 2009: 14). Practitioners of CSR are often acutely aware of the tension between the complex reality they engage in and the standards that are assumed to guide their work and reporting. In keeping with this we will assume that the meaning, content, and character of CSR work is also contested and negotiated within the corporation.

Below we will first discuss how the Norwegian state manages its ownership of Statkraft, especially focusing on the evolving "expectations" for how the corporation should handle CSR. We show how Statkraft, at an overarching level, interprets these expectations in the context of increased international activity. Second, we outline Statkraft's use of the performance standards of the International Finance Corporation (IFC) and explain why the IFC-inspired focus on Project Affected People (PAP) by many Statkraft staff is considered a better way to pursue "environmental and social management" than classical CSR. Third, we detail Statkraft's CSR work in Turkey through several case studies that show that the practice of CSR is flexible and pragmatic and often mixed with other agendas of the corporation. In doing so, we also show how Statkraft's CSR work feeds into reporting and public relations. Drawing on the case studies, we argue that the application of standards results in much less standardization than is often assumed, yet the elusive figure of the "stakeholder" plays an important role in holding together the heterogeneous field of CSR.

## Statkraft: Internationalization and State Expectations to CSR

The corporatization of Statkraft was strongly interconnected with internationalization of the power sector. When the ministerial agency Norwegian Water Resources and Energy Directorate (NVE) split into several units in 1986, Statkraft became an independent economic entity. It was corporatized in 1992, becoming a state enterprise. This was motivated by a desire to make the entity a more effective, modern, and competent actor in the recently (1991) liberalized electricity market in Norway, but also by shifts in Norwegian and European power supply systems (Skjold 2009: 228). In 2004, driven by the desire to operate more easily internationally (Meld. St. 22 [2001–2]; Nilsen and Thue 2006: 371-73; Skjold 2015: 16), Statkraft became a limited liability, but unlisted, company. The state retains all shares, but the government has transferred judicial responsibility to the board and management of the corporation. The government appoints the chair of the board, which consists of nine members, three of whom represent employees (but not necessarily unions).

Statkraft's board had argued that "the state enterprise form is not known as a corporate form internationally" and that "the suggested reorganization allows Statkraft to present itself more clearly as a purely commercial actor in line with its most important competitors" (Prop. 53 [2003–4]: 26). Internationalization was the keyword in the new corporate strategy in 2006 (Nilsen and Thue 2006: 397). Building on a strong tradition in hydropower in Norway, Statkraft is now considered Europe's largest renewable energy corporation and has operations in Asia and South America as well.

The international expansion of Statkraft's operations, especially outside of Northern Europe, confronted the corporation with new

challenges as regards responsible conduct and risk management, including violent local resistance (Skjold 2015: 212) or large-scale population resettlement (Laos). Its owner, the Norwegian state, provided only indirect guidance. Governments in Norway have been very concerned about the state managing its ownership "professionally." Therefore, the Ministry of Trade, Industry, and Fisheries, which "owns" the corporation, is expected to not interfere in daily operations but rather express its "expectations," which are to be interpreted and implemented by corporation management and reviewed by the board. The primary aim of the state's ownership of Statkraft, as expressed in a white paper on state ownership, is that "the company is to be run on a commercial basis and with the aim of delivering a competitive return" (Meld. St. 27 [2013–14]: 108).

However, governments have since 2006 also expected that corporations under state ownership should take a leading role in safeguarding CSR (Meld. St. 13 [2006–7]: 64), noting that if they do not, "the state's legitimacy could be weakened, for example as legislator and in matters concerning foreign policy" (Meld. St. 10 [2008–9]: 18). The 2013–14 white paper on state ownership is more specific in that it requires corporations in which the state has significant ownership and which have overseas operations to sign up to Global Compact, follow the OECD responsible business conduct recommendations for multinational corporations, take up ILO's core conventions in their business, and apply GRI reporting standards (Meld. St. 27 [2013–14]: 83). The government's specific expectations that Statkraft will conduct "responsible" business abroad is articulated in the public arena. A presentation by Monica Mæland (Conservative Party), minister of trade and industry at the Bergen Chamber of Commerce and Industry in 2013, included a slide that carried the title (in Norwegian) "Social Responsibility—a competitive advantage" and stated in bullet points: "Clear expectations that Norwegian business abroad takes responsibility"; "Increased awareness among Norwegian firms"; "Statkraft takes responsibility in Turkey." The text was accompanied by a photo from the signing of the energy agreement between Norwegian and Turkish ministers during the Norwegian state visit to Turkey in 2013, also showing the Turkish president and Norwegian king attending the ceremony.

## Taking a Leading Role—With Multiple Models

The state's "expectations" about responsibility are communicated to Statkraft's board and management but are quite general, so they are open to a certain degree of interpretation and negotiation. In

conjunction with the publication of the white paper on CSR (Meld. St. 10 [2008–9]), a Statkraft employee recalls discussions with fellow employees about how to present CSR to the corporation leadership and how to implement the white paper's requirement of taking "a leading role within the field." Similar concerns were expressed when we had our very first meeting with a senior CSR manager in Statkraft in 2013; he stressed that "since Statkraft is owned by the state, we are also partly Norway's ambassador. We are concerned about earning money in a decent way."

The explicit focus on CSR emerged in Statkraft around 2003 and then specifically within SN Power, which Statkraft established together with Norfund (Norway's Development Finance Institution) to invest in high-risk hydropower projects in developing countries (Skjold 2015: 203-4). It was, and is, a widespread idea that, while CSR was unnecessary in Norway since all relevant social and environmental matters were covered by law and regulations, operations abroad, especially beyond Europe, required more attention to issues such as local resistance, corruption, indigenous populations, and human rights. There was large overlap in personnel and operations between SN Power and Statkraft, and both recruited many non-Norwegians into the organization. Half of the approximately fifteen interlocutors we have had in Statkraft in Oslo were not Norwegian, and many of the Norwegians have gained extensive international experience.

Through international experience and staff, Statkraft came to engage various internationally circulating models of CSR. While CSR seems at first to have been the preferred label, corporate responsibility (CR) has since 2010 been used by management and in annual reports as a strategic term to broaden the corporation's work on responsibility, taking the attention away from the "social" of CSR to include environmental and economic responsibility toward owners (while the Norwegian term samfunnsansvar—societal responsibility—has been the overarching term all along).<sup>2</sup> All new Statkraft employees receive a week's training in Statkraft's "code of conduct" together with other core principles. Environmental and Social Management (ESM) has become an increasingly important corporate term; the internationally more widespread appellation Environmental and Social Governance (ESG) is also used. From 2004 to 2010, nonfinancial parts in annual reports were called "sustainability" reports, and the title CSR is still in use, both in documents and as vernacular.3

The several ways of talking about, implementing, and reporting so-called nonfinancial matters within Statkraft became apparent to us in pursuing a multisited fieldwork across different locations, documents, and websites. It is a complex picture, with standards and models coming from different places being used for different purposes. Those most frequently used in Turkey were the performance standards of the IFC and the reporting standards of the GRI—two of the most widely used standards in the private sector (Idowu et al. 2016; Shabana et al. 2017). In the following, we outline Statkraft's use of IFC performance standards (IFC-PS) and explain why this was preferred over classical CSR.

## Doing CSR with IFC Performance Standards

When we first visited the project site in Turkey in 2013, the CSR coordinator in Turkey gave a presentation about their work, including the slide portrayed in figure 10.1. We came to learn that the language and approach presented in the slide was taken directly from the IFC-PS. IFC, one of five organizations within the World Bank Group, works to stimulate development in developing countries through credits, especially for private sector investments in large-scale infrastructural projects. Institutions receiving credit from the IFC are required to comply with IFC-PS and to report to and be audited by the IFC. "The Performance Standards ... are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement" (IFC 2012: i).

Statkraft's use of IFC-PS is voluntary. From at least 2009 the development of international projects in Statkraft's portfolio has been informed by IFC-PS and is included in the policy document *The Statkraft Way.*<sup>4</sup> Statkraft employs IFC-PS even though they are neither bound by loans to the IFC nor required to by their owner. This praxis seems related to the fact that hydropower, more so than extraction of hydrocarbons, has been made subject to international standards. Scandals and resistance related to construction of large dams resulted in the establishment of the World Commission on Dams in 1998 as well as the World Bank's establishment of standards for projects using IFC credit.

Statkraft's first activity beyond Europe had the character of development projects, especially its operations through SN Power with funding from Norfund. Statkraft's project in Nepal in the 1990s and SN Power projects in the 2000s (Skjold 2015: 212) received IFC funding, and they were thus obliged to follow IFC-PS and reporting guidelines. Although Statkraft no longer frames their projects abroad as also being development projects—considering them now

## **Principles**

The CSR action for Kargi HEPP followsTurkish legislation, Statkraft's policies and good international practice.

- All affected people should be fairly compensated
- All affected people should be presented livelihood restoration options.
- Social impact mitigation in Turkey: Turkish law enforces cash compensation only.
- > Statkraft approach to mitigation: Compulsory cash compensation accompanied by voluntary mitigation measures.



Figure 10.1. Localizing IFC standards in Turkey. © Statkraft

to be business opportunities only—they continue to adhere to international IFC standards. The standards have been "lifted" from the development discourse into Norwegian state-speak about corporate responsibility. Government policy documents concerning CSR expect corporations to adhere to international standards. However, Statkraft considered UN Global Compact and OECD guidelines to be too vague to guide on-the-ground implementation of CSR and preferred to follow the international trend by adopting IFC-PS, the most widely recognized and used performance framework.<sup>5</sup> Statkraft management also considered that it was preferable to have consistent high-standards policies throughout the organization in place of following different local standards. Choosing to use IFC-PS, they replaced traditional CSR with a holistic and long-term perspective and plan for corporate responsibility while also branding Statkraft as being a serious and responsible player in the international energy landscape. Yet, it also meant something in practice: Through experience, Statkraft found IFC-PS to be a useful tool when they encountered new challenges, such as relating to indigenous populations in a project in Chile (Fribert 2018).

As a voluntary user, Statkraft is in a position to negotiate how to employ IFC-PS. Although not following full IFC protocol, Statkraft staff are trained in IFC-PS methodology and use its language for internal communication. This is, however, embedded within a broader policy for Environmental and Social Management (ESM) in Statkraft. Further, stakeholder management is seen to be of critical importance for ESM and, as will be discussed further below, has a wider framing than that provided by IFC-PS. Statkraft's experience with a large resettlement program in their Theun-Hinboun project in Laos, where "participatory planning" had helped secure "stakeholder acceptance" (Sparkes 2014: 65), has been formative in their approach to "stakeholder management."

The shift to IFC-PS in Statkraft was a conscious choice and reflects a position in Statkraft about what responsibility really implies. Most of the ESM people in Statkraft dislike the concept of CSR, which they describe as signifying "corporate excuse, twisted branding," and philanthropy verging on corruption. Although realizing that CSR can be a useful term to build reputation, they would typically assert that PR and the socioeconomic should ideally be "unmixed." "In the field CSR proves to be utterly useless," they contended. In place of CSR, they stressed the value of IFC-PS and its emphasis on project-affected people, mitigation, and livelihood restoration.

This is congruent with a broader shift in corporate circles (Edgecliffe-Johnson 2019) toward ESG and is mirrored by one of the leaders of the IFC, who in conversation with us stressed that the social and environmental policies of corporations should be "rightsbased" and not manifest as charity (which he thought characterized CSR). This take on CSR stresses, rather, that it should be integrated in the way corporations do business; those working with ESM in Statkraft have argued internally for having CSR included in the risk-management process, motivated in part by a need to legitimize spending money on CSR. The following section explores what ensues when the IFC standards meet local realities in a concrete project.

## "Statkraft Takes Responsibility in Turkey"

Statkraft bought a portfolio of three projects in Turkey in 2009, entering a power and electricity market that had been going through a radical liberalization and deregulation process since the early 2000s (see, e.g., Harris and Işlar 2014). In the face of Turkey's heavy dependence on imported oil and gas, a primary strategy of Erdoğan's governments has been to stimulate growth through the development of hydropower and other domestic energy resources. While the Turkish state remains the main driver for construction of hydropower, lack of domestic capital and competence has led to the invitation of foreign corporate investment in the energy sector. Statkraft is only one of many European corporations that started exploring this opportunity during the 2000s.

Statkraft's construction on the run-of-the-river medium-sized power plant Kargı (located between Ankara and the Black Sea coast) started in 2011, and the power plant was put into operation in May 2015. The smaller power plant Çakıt in Adana Province did not require construction work and began commercial operation in June 2010, while the construction of the third project in Çetin located in the southeastern part of the Anatolian region began in 2012 and was expected to be Statkraft's largest hydro asset outside of Norway. Statkraft reckoned that they had invested in a safe market within a growing economy and expected that they would expand further in Turkey.

Terror incidents, falling prices for electricity, the Syrian refugee crisis, and political uncertainty made Statkraft apply the brakes, and when the project in Cetin became imbricated in complex statepolitical-development processes and accumulated a composite of problems (technical, security, contractual, political), they halted construction and eventually sold the project in 2017 to a Turkish corporation, which has worked as Statkraft's contractor in their project in Albania. Although starting with ten to twenty employees, the local Statkraft staff working on CSR has, with the sell-off of Cetin and the shift to operation in Kargi, been reduced to only one person. We arrived when Statkraft was becoming uncertain about their strategy in Turkey, and, because we could not gain access to the field in Cetin, focused instead on Statkraft's Kargı project.

Overall, IFC-PS has been the main framework for Statkraft's CSR work in Turkey. At an overarching, national level, they have also supported World Wildlife Fund and Syrian refugees; at the local level they have organized training and public awareness concerning traffic and reservoir security and proved community support. The project in Cetin involved other initiatives as well. Adhering to the IFC requirement that "when host country regulations differ from" IFC-PS, "projects are expected to achieve whichever is more stringent" (IFC 2012),6 Statkraft prepared social impact assessments (SIA) for their projects in Turkey (not required by Turkish regulation) (IFC 2015: 57). The Cetin SIA, prepared by international experts, was thoroughly informed by IFC-PS, elaborating, over a couple of pages, the details of stakeholder engagement and assessment using IFC-PS (Meadows

and Helps 2010: 21-23). The emphasis on IFC-PS is also seen in documents prepared for the Kargı project. The "Environmental and Social Management Plan for Operation (2016–2020)" was "produced in line with *The Statkraft Way*" and the IFC-PS. Accordingly, the CSR work focuses, as we saw in figure 10.1, on project-affected people, impact mitigation, livelihood restoration, and compensation. Yet, the concept CSR is also used in the report, and the CSR-budget/reporting format includes several non-IFC topics, including "public relations." So, how is IFC-PS set to work in Kargi?

The main agricultural activity in the impacted districts Osmancık and Kargı is the cultivation of rice on irrigated banks along the river Kızılırmak. The Kargı hydropower project includes a relatively small reservoir in the district of Osmancık, from where a tunnel, shortcutting Kargi, transfers water from an outlet near the dam to a point farther downstream where the powerhouse is located. The areas inundated by the dam are not very extensive,7 and had mostly been used for intensive high-value rice cultivation. Downstream, and mainly in the district of Kargı, the major impact is related to reduced flow.

During construction, the primary concern for Statkraft's CSR work was to compensate, according to Turkish law, for the loss of rice-farming land. However, compensation alone—based on state expropriation of land, a demanding and extensive process—was not sufficient to comply with the IFC-PS or The Statkraft Way guide for Environmental Management, which states: "Statkraft shall ensure that grievances from affected communities and external communications from other stakeholders are responded to and managed appropriately." Therefore, Statkraft established a grievance mechanism, operated out of a liaison office in Osmancık, whereby they assisted the farmers with the expropriation process. Statkraft also worked to help farmers find new sources of income through livelihood restoration projects. Farmers were provided equipment and training in horticulture, greenhouse farming, honey production, and other agricultural activities that require less water. After hydropower production started, the focus of CSR shifted to include the downstream issue, which was framed by a legal requirement to provide enough water for rice farmers.

When we met with Metin, one of Statkraft's CSR officers, in 2016, we were invited to join a meeting intended to stimulate livelihood restoration through beekeeping. Approximately twenty-five middleaged and elderly farmers who had lost their rice farms to the dam

attended. The beekeeping consultant engaged by Statkraft for the project talked about knowledge sharing and cooperation and explained that beekeeping "is quite difficult, but possible if you are willing to learn": "At first we will hold your hand, guide you through it; then we let go of your hand, help you when you need it; until, after a two-year period, our help is unnecessary." The farmers seemed to be interested and were keen to ask questions. The project was obviously considered promising, and Metin posted a "snapshot" (a photo with a short text posted on the internal web for those in Statkraft working in/with Turkey).

However, beekeeping was not a success. After only a year the project was discontinued. A few farmers continued the greenhouse project, but, otherwise, farmers, or PAPs according to IFC and Statkraft lingo, were not very keen on taking up the "livelihood restoration" opportunities presented to them by Statkraft. They preferred cash payments, which they could invest in property and/or their children's' education. Their attitude was related to the general economic and demographic structure: The agricultural sector in Turkey is increasingly marginalized, and the rural population is decreasing and aging. Most farmers in Osmancık and Kargı are over fifty years old, and, generally, their children have moved to larger cities in the west, particularly Istanbul. Although the beekeeping project was unsuccessful, Statkraft showed the ability to pragmatically extend CSR in various directions.

## **Pragmatic Extension of CSR**

A Local Initiative: Recycling

When we returned to Osmancık in 2017 Metin was keener to talk about a new initiative than the failed beekeeping project. He wanted to show us the year's most successful environmental and social project: recycling projects at local schools. Statkraft had, on Metin's suggestion, initiated the projects in response to the problem with waste at the dam. In cooperation with local authorities, Statkraft trained two schools how to recycle. Pupils learned to gather plastic, paper, and metal and toss it all into a bin in the schoolvard. A recycling company gathered the waste once a week, sorted and weighed it, and reported back to Statkraft. For each ton collected, the school got a used Statkraft laptop computer.



Figure 10.2. "Good Neighbors." From article "Recycling Knowledge," p. 37 in Statkraft's magazine People and Power, issue 2, 2017. © Bahadir Sezegen

We went with Metin to the schools to deliver laptops. The primary school had managed to collect eight tons of waste, while the secondary school had collected two tons. Both schools wanted to continue the project after it was scheduled to be discontinued one month later, but Metin informed them that "there are unfortunately no more laptops to deliver." The principal argued that they did not care about the laptops only the project, because it had positive ripple effects in the local community, creating awareness about recycling and climate. After tea and small talk with the principal about the value of the recycling project for the children and the local community, Metin called the main office in Oslo, which confirmed that the schools could keep the bins. When we left the schools, Metin was happy: "This is a very successful project. The schools are taking responsibility—making the project their own."

The recycling project is more in line with the typical way for Turkish corporations to contribute to society. Some locals voiced opinions, such as: a "large foreign company like Statkraft" should invest more in "social projects" or "social funds" (newspaper article<sup>8</sup>); "I have not seen any social support from Statkraft" (conversation with local farmer). The concept "social support/projects/funds" here indicates a different approach to corporate responsibility than that practiced by Statkraft. Philanthropy remains the dominant form of CSR in Turkey, and "most family-owned conglomerates in Turkey

have an associated foundation" (Ararat and Göcenoğlu 2005: 11) typically supporting "society," especially education, religion, and health. In Turkey, moral standards for the appropriate or expected behavior of business owners and leaders are strongly connected to ideals and practices of patron-client relations.9

A good example of how this Turkish framework for charitable giving informs the way in which large Turkish energy firms perform their responsibility to society can be found in the CSR prize of an annual Istanbul energy conference; in 2018 the prize was awarded to an energy utilities company that had successfully provided clothing and food for pupils at village schools and supported sports and Ramadan meals. 10 In the Turkish context, this is not usually "rights based" but considered a human duty, a moral obligation embedded in interpersonal relations. While Statkraft tries to embed ethics in systems and international standards, in Turkey, people tend to prefer to see ethics as embedded in persons and interpersonal relations. To the extent that "impact management" is considered anyone's responsibility, it would be in the government's implementation of state regulations. It is also notable that the Nordic model for a corporation's interaction with its environs is not activated. For instance, relating to or involving unions was totally outside of the scope of Statkraft's approach in Turkey.

In addition to the livelihood restoration projects, Statkraft also undertook what is regarded as classical CSR work, or locally as "social projects." Although the CSR personnel were ambivalent about it, they established community development funds (included in their CSR budget), which were used for a variety of purposes, such as funding for Ramadan meals. They realized that some such activity was needed to build and sustain good relations. Supporting schools—as Statkraft did in the recycling project—is also the kind of thing corporations are expected to do in Turkey. Unlike the livelihood projects, this initiative received a decent degree of local press coverage. Thus, the Turkish understanding of corporate responsibilities increasingly came to inform the CSR work of Statkraft. CSR became "localized" (Welker 2014) or "domesticated" (Knudsen 2015) as the recycling project emerged as a local success.

The cases discussed above relate primarily to the area directly impacted by the dam where it inundated rice fields near Osmancık. Another way in which Statkraft has pragmatically extended and adapted CSR work to fit new situations and agendas emerges as we turn attention to the downstream issue.

#### Rice Cultivation in Kargı

Early autumn is a busy period for rice cultivators in Kargı. Most open spaces are covered by rice spread out for drying. In 2016, we dropped in to visit our acquaintance Ismail at his camp and threshing ground. Learning that he was away on an errand, we were treated to a simple meal, including rice—from their own production—which they eat every day, year-round. İsmail's wife, an elderly woman, complained about her bad back and pain in her legs. Still, she was compelled to work; they needed money to marry their grandchild.

Ismail arrived on his motorbike. He was tired and morose. Long days and hard work for an old man. His fifty-year-old son was more talkative. The son operates the harvester they bought a few years back and is paid three hak ("rights," one hak equaling two sixkilogram bins of rice) for each acre (dönüm) that he harvests for others. Like many other families, their extended family works together to cultivate both their own fields as well as the sharecropped (yarıcılık) fields of more wealthy farmers. As is common in Kargı, their plots are small and widely dispersed, making the operation of the harvester cumbersome and costly. The rice cultivators desire a reorganization and consolidation (toplulasturma) of their fields, but that is difficult to achieve without political will.

For many, rice cultivation has developed into a side income. Most rice cultivators are middle-aged or older. Young people are leaving Kargı, and the population of the small-town risks falling below five thousand, which is the threshold for being a municipality in Turkey. Although concerned about the dam constructed by Statkraft, rice cultivators find that they have enough water. Many farmers related that, when water stopped flowing a few years back, they called Statkraft, and the water flow resumed. They are more concerned about the costs of pumping water from the Kızılırmak up into the canals and their fields. There are also other costs involved: seeds, fertilizer and pesticides, guards, and more. Many complain that "the state does not support us any longer. We are not given a guaranteed price for the rice."

Interacting with a broad cross section of the society of Kargı, we tried to elicit the history and structure of the irrigation system in the district. Nobody seemed to really know. There are many institutions involved: General Directorate of State Hydraulic Works (DSI); the Kargı municipality; village heads; rice-farming cooperatives; the district office of the Ministry of Agriculture, Forestry, and

Livestock; the Agricultural Credit Cooperative; the Kargı Chamber of Agriculture, among others. Ownership of and responsibility for maintaining the irrigation structure is unclear. Does the DSI or the cooperatives own the channels? There is no overview of where water comes from and where it goes. There is no overall plan for irrigation and cultivation except for some limited measures administered by the state-organized District Rice Commission.

#### Surveying Irrigation, Enlisting Stakeholders

Statkraft is under contract with the DSI to release enough water for the seven hundred downstream farmers, mostly smallholders, to continue irrigation of their rice paddies during the May to October cultivation season. The contract stipulates the amount of water to be released as well as the periodicity. To help ensure that farmers receive enough water for irrigation, Statkraft organized and funded refurbishment of water-intake weirs. Beyond this, the CSR consultant's regular monitoring of water flow and agricultural activities convinced corporate leadership that it could be useful to make a detailed survey of the irrigation system and water use in Kargı. An international consultancy was contracted. The work basically involved walking up all channels, weirs, and the like and mapping them into a Google Earth template program to produce a detailed digital map of the irrigation system.

According to Statkraft personnel, "stakeholder mapping" was undertaken, and stakeholders were consulted in the process. The instrumental and managerial approach to "stakeholders" is demonstrated in this excerpt from an internal Statkraft presentation: "Engaging with stakeholders from the start (before operation) enables a proactive cultivation of relationships that can serve as 'capital' during challenging times." During our fieldwork in Kargı, it emerged that almost no one (except two leading local officers) knew about the irrigation survey, and even familiarity with Statkraft was limited. İsmail was relatively well-informed about Statkraft, but he and his fellow villagers knew nothing of the survey when we met him in late 2018, after the survey had been completed, which was striking given that he is a village head and village heads are identified by Statkraft as being among their primary stakeholders. A few meetings had been organized before the survey took place, but they did not focus on the survey. Only after a draft digital map had been produced did the CSR officer and an expert from the consultancy firm perform what they called "ground truthing," that is, checking their findings with local farmers, thus clearly serving Statkraft's rather than stakeholders' interests.

Statkraft's primary objective in doing the survey was, we were told, to "know the system better." The detailed knowledge gained about the irrigation system enabled them to start renegotiating the contract with the DSI with a view to becoming obliged to release less water during the irrigation season, in effect meaning that more water is retained for Statkraft to produce electricity and income. Although the project was not funded through the CSR budget but from "assets," it was managed by CSR personnel. It is a "winwin situation," a CSR officer told us. He thought it was natural that they, who were involved with stakeholders and community relations, handled this: "It is oftentimes the case that we have overlapping interests with other sections in the corporation." That Statkraft considers the survey of the irrigation system to be CSR activity demonstrates the flexible pragmatism of the corporation when it comes to implementing standards as well as the perceived importance of community and stakeholder relations for making things work locally (cf. Welker 2014).

## **Reporting CSR**

Like performance, reporting CSR also involves a pragmatic approach. Although external reporting is not met with any significant sanctions, Statkraft is obliged to conform to the language of GRI for reporting purposes. Managed primarily by a small section at HQ, the GRI standards do not travel very far or deep into the Statkraft organization and are distinctly different from the IFC-PS language. Working for external reporting in Statkraft, therefore, involves considerable internal translation work to produce not only indicators but also stories in which "stakeholders" figure prominently.

Stories are, however, not only reputation-management material. They may also become important ingredients in Statkraft's reporting processes. Reporting in keeping with the law on accounting requires, according to the Office of the Auditor General of Norway, an annual report, a sustainability/CSR report, and quarterly results, but it can include information from the corporation's webpages (OAGN 2016-17: 151). According to personnel in the Statkraft CR division, stories in their magazines are considered to be "realistic" field reports and are used as the backdrop for annual reports and further CR strategy development.

The consideration of field reports as "realistic" depictions of CSR in practice makes internal reporting key to CSR officers. When Statkraft decided to keep only one of the two local CSR officers, they retained the one who was best at reporting. One of his superiors stressed that "quality in reporting is essential." Reporting, he maintained, is a skill that takes time to acquire, and Statkraft observes a strict reporting cycle. For instance, the plan for Environmental and Social Management in the Kargı project (2016–20) prescribed quarterly reporting on content and spending for a range of matters. Once a year the CSR officer is also asked to submit a standardized riskassessment form. This reporting is not guided by GRI standards but works within an ESM framework.

Although internal reporting follows certain templates/formats, there is room for individual initiatives, such as the recycling project. As Metin left the meeting with the principal with whom he had discussed the future of the recycling project, he remarked, "I must report to Lysaker [Statkraft's HQ in Norway]." His next step was to gather photos and documents from the schools and prepare a presentation for the next CSR performance meeting in Lysaker. The recycling project, like the beekeeping project, was circulated internally as a "snapshot," but it was subsequently picked up for publication in the online Statkraft Stories Collection and the Statkraft magazine People and Power. 11

The Kargı irrigation survey also traveled up through the organization to be included in Statkraft's Annual Report 2017, where a photo that had started out as an internal "snapshot" about ground truthing was displayed among "Highlights" with the caption: "Continuous dialogue with stakeholders was upheld, like in Turkey where downstream impacts were discussed with local farmers" (Statkraft 2017a: 3). The Kargı irrigation survey is presented as "a mitigation programme to improve irrigation systems downstream of the intake dam" (Statkraft 2017a: 30). The major motivation for the survey—the potential for making more profit—was underplayed, while the alignment with IFC-PS framework ("mitigation") and degree of interaction with stakeholders was exaggerated.

While "stories" travel up through the Statkraft organization and figure in external reporting, the formal framework for Statkraft's external reporting is GRI in accordance with the expectations of the Norwegian state (Meld. St. 27 [2013–14]: 83). GRI was established in 1997 as an independent international organization and has become the

dominant framework for sustainability reporting. In order to simplify and ensure relevance of reporting, GRI established the "materiality" (i.e., essential) principle that implies that organizations are expected to address and report on matters that are central to its impact on society and environment. The latest version of GRI standards, G4, "guides companies in how to identify their major sustainability impacts, and then enter into a dialogue with key stakeholders—which they define themselves—to answer the question: 'What are the material aspects, and to whom?" (GRI and Robecosam 2016: 8). Thus, it is left to each individual organization/company to design how it will organize stakeholder processes and identify material aspects. Process, not indicators, are imposed by GRI on Statkraft.

Statkraft started following the GRI recommendations several years before the state made it a requirement. In 2015, they undertook the materiality analysis, primarily by arranging workshops with key persons within Statkraft and with only limited input from stakeholders. Involved staff were asked by colleagues from the CR unit to "assess the materiality of all the corporate responsibility aspects ... based on how important it is for Statkraft's ability to meet corporate strategies and goals and retain our 'license to operate.'" After categories and content were negotiated internally, the materiality assessment identified six aspects that were most "material," related to environmental issues, safety, human rights, and anticorruption.<sup>12</sup> The materiality analysis is meant to give structure to further CSR work: "Statkraft has developed ambitions and goals towards 2020 for the six material topics, and Statkraft's corporate responsibility report is structured according to the identified material topics" (Statkraft 2017b: 32).

Reporting to GRI does not really involve any content and review thereof by GRI-it essentially means submitting a GRI-structured report for publication on GRI's website. The 2017 CR report includes four pages that essentially list what has been reported by and to whom (e.g., the Statkraft board), organized by the categories and standards used by GRI. 13 The reporting recommendations by the state are not supported by any sanctions and leave Statkraft to decide how to involve stakeholders in materiality assessment and reporting. In their daily internal work, those responsible for reporting in Statkraft do not consult stakeholders directly but, rather, organize in-house studies of stakeholder perspectives and interact with Statkraft staff who can provide useful "stories" or other relevant information for their reports. They consider this robust enough since stakeholder engagement is integral to all phases of Statkraft's projects. Thus, Statkraft is very much at liberty to design the process and content

of reports. Given the limited content and sanction relating to the use of the GRI standards, "stakeholder" perspective and "stakeholder" involvement stands out as a central legitimizing figure for Statkraft's approach to CSR.

## Managing Stakeholders

What emerges from the discussion of the application of different standards above is the ubiquity of the figure of "stakeholder." It is one of the few concepts that has purchase across the different standards and models that Statkraft employs or relates to when enacting responsibility. However, that does not necessarily imply that its meaning is the same within different contexts. "Stakeholder" is a particularly open and negotiable concept with no clear denotational value—it is detached from larger structures of power, politics, and economy, which Giles Mohan and Kristian Stokke (2000) call "the dangers of localism." "The weakness of stakeholder theory lies in the underspecification of the organization/stakeholder relation in itself" (Friedman and Miles 2002: 15). It is precisely this underspecification that makes the frequent deployment of the term "stakeholder" across a variety of contexts and for different purposes possible and useful for Statkraft and gives a semblance of their CSR work being cohesive and unitary. But there is a huge difference between a property-less (e.g., not being entitled to membership in a cooperative) peasant in Kargı and the DSI ("our most important stakeholder"). Beyond this, the underspecification of the stakeholder concept also facilitates the enactment of multiple versions of the same stakeholder at different places in the corporation: the irrigation project stakeholders engaged by the CSR officer in Kargı are very different from the irrigation project stakeholders who figure into the 2017 annual report.

Although it is commonplace today to use the term "stakeholder" in a wide range of contexts, including environmental management and development projects, the concept had its roots in business and management science in the early 1980s (Jones and Wicks 1999; Grimble and Wellard 1997). But the management literature and its adoption by businesses has largely been insensitive to framing issues. Who defines the issue? What definition of stakeholder is to be employed? Which actors are affected by or have an interest in the topic? What is the "mandate" for stakeholder involvement? Every decision about who is entitled to be considered a stakeholder is, in the end, political. Company control of reporting processes means that the

corporate perspective will dominate, and stakeholder dialogue can be transformed into the ultimate legitimating tool, since stakeholders carry legitimating authority in "participatory" processes (Cooke and Kothari 2001). Questioning the content of a report becomes more difficult if an organization can say that it has consulted stakeholders when preparing it.

The contrast between the minimal involvement of "stakeholders," lack of local consultation, and the profiling of—precisely—the "stakeholders" shows that, sometimes, the real concern about "stakeholders" is at the corporate level—in reports and reputational management. The local stakeholder is an important legitimizing figure in CR reporting and in corporate communication. The CSR consultants have an important position in this, doing in effect not only work directed at the community but also upward within the corporation.

While Statkraft's use of "stakeholder" may seem political, it does not have the "deep" effect "neoliberalism as governance" approaches sometimes assume. Few readers of Statkraft's CR report actually understand the indicators used, and hardly any of Statkraft's "stakeholders" realize that they are "stakeholders" and sometimes even "PAPs." They are not covertly guided toward self-governance (cf. Merry 2011) through internalizing Statkraft's use of standards and indicators. Statkraft does not organize the world of stakeholders through indicators—the indicators hardly organize things internal to Statkraft. That the indicators are produced is more important than what they reveal, since their existence is sufficient to fulfill reporting requirements. Therefore, the stories told in the report or in the Statkraft magazine are just as important as the indicators for conveying Statkraft's responsible approach.

#### Conclusion

CSR is many things in Statkraft. A multisited approach has enabled us to see that responsibility is engaged by different people with different agendas in a range of different places across the complex, geographically distributed corporation. CSR is transformed and transmuted and set to do different kinds of work. It is sometimes compartmentalized—in organizational structure, reports, and the like-sometimes merged or cross-fertilized with other activities. At other times CSR is seen as embedded within core activities (e.g., within risk management) or considered the responsibility of management and the board. There are several distinct, yet overlapping, communities of standardization practice (Star and Lampland 2009:

7) within Statkraft, and the transition from "doing" CSR (in line with IFC-PS) to "writing" CSR (according to GRI standards) is therefore blurry and involves translation work.

In Statkraft there are many different reasons for a move toward standardizing CSR work, but there are likewise many causes for the partial implementation of standards, be it flexible adaptation to local expectations (recycling), in-house pragmatic mixing of CSR and other agendas (such as in the irrigation project), or a consideration of what resources are "reasonable" to spend on aligning with international standards that are frequently upgraded. Heterogeneity of the CSR field is probably also reproduced by people wanting to hold on to their jobs and who are defending and expanding their turf. All the translation work going on within the corporation, between different standards and for reporting—much of it for internal purposes only is very costly in terms of effort; not all find it meaningful. Reporting is demanding for Statkraft, not because it puts limitations on the way in which staff manage their projects but because of the translation work and internal mobilization necessary to produce stories, categories, and numbers that satisfy the externally defined standards and perceived needs for corporate communication.

CSR work is not as standardized as it may appear from the outside and as many analysts seem to assume (Merry 2011).14 It is perhaps precisely the ability within Statkraft to keep CSR in "suspense" – or rather keep in suspense the ambivalences and dissonances concerning standardized CSR—that makes it useful and powerful. Standardization is thus partly a "make believe" standardization, and work related to CSR standards is characterized by flexible pragmatism. It is precisely because people in corporations are pragmatic and flexible that standards seem to be working, just as James Scott (1998) argued was the case for high modernist states' standardizing schemes, and Susan Star and Martha Lampland (2009: 4) have argued is generally the case in people's dealings with standards: "work must get done." Corporations may be less rigid than high-modernist state bureaucracies. Pragmatic flexibility is actually encouraged by persons in relevant senior or CSR positions in Statkraft who, taking a reflexive stance, do not find it problematic that there are many ways of doing and talking about CSR within the organization: "Those working in the field must themselves find the concepts that are most natural for them to apply"; "CSR will always be framed by local politics and culture"; "Our use of 'CSR' is pragmatic—we are looking to get things done." The pragmatic approach is even articulated in the CR report: "Statkraft has a decentralized approach to stakeholder management" (Statkraft 2017b: 9). That the border between CSR and other activities

becomes blurred is even considered appropriate—that means that CSR has become integrated with other concerns and agendas in the corporation. Especially when it comes to reporting, it may be more important for the corporation to "be seen making the world legible" (i.e., transparent) rather than actually doing so.

Although Statkraft employees may stress that they act as "ambassadors" of Norway in their foreign operations, and the ministry stresses that it expects Statkraft to be responsible when operating in Turkey, there is not much trace of the Nordic model in the way in which Statkraft works in Turkey. The way they enact responsibility is informed by international standards, particularly those of the IFC and the GRI. Thus, the concept of "stakeholder," for example, has come into Statkraft's vocabulary through interaction with international standards and experience from managing international projects. Statkraft has never used the concept in its domestic activities. The "other" of Statkraft in a domestic context has not been standardized as "stakeholder." As a state agency in Norway, the work of Statkraft had been embedded in regular political and bureaucratic procedures and a complex sociopolitical landscape consisting of citizens and households, users, municipalities, other state agencies, unions, and various other organizations. There its activities were "already" political and not easily framed as Statkraft vs. stakeholders. But, operating away from home, Statkraft has needed both CSR and stakeholders—little of which has been explicitly informed by the Nordic model. However, the Norwegian state has not requested Statkraft to be "Nordic" when working abroad. They are tasked primarily with doing business. If one can argue that reference to universal norms for responsibility may be typical in the Nordic societal model, then one may perhaps also say that it is "Nordic" to expect corporations to be particularly responsible by requiring them to adhere to international standards and frameworks.

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#### Notes

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- 1. Fossekallen 1979, no. 10: 5. http://publikasjoner.nve.no/fossekallen/1979/fossekal len1979\_10.pdf.
- 2. https://www.statkraft.com/annualreport2014/Corporate\_Responsibility/CR-in-Stat kraft/, accessed 9 March 2019.

- 3. In this text we will for consistency continue to use CSR as an overarching analytical term, even when Statkraft employees would have preferred another term.
- 4. https://www.statkraft.com/globalassets/x-annual-report-2013/04-samfunnsansvar/02styring-av-samfunnsansvar/01-the-statkraft-way/cr-hse-policy-for-report tcm245-26148.pdf, accessed 22 January 2019.
- 5. https://www.statkraft.com/media/news/News-archive/2011/corporate-responsibilityand-new-projects/, accessed 19 January 2019.
- 6. https://www.ifc.org/wps/wcm/connect/115482804a0255db96fbffd1a5d13d27/PS\_Eng lish 2012 Full-Document.pdf?MOD=AJPERES, accessed 25 February 2019.
- 7. According to Statkraft internal documents, loss of 4,271 decare of land, of which more than 3,000 decare are first-class agricultural land.
- 8. "Kargı HES'e Sosyal Proje Tepkisi," Osmancık Haber, 4 January 2013, retrieved 25 October 2013 from http://www.osmancikhaber.com.tr/haber-2082-Kargi-HESe-Sosyal-Proje-Tepkisi.html.
- 9. For an elaboration and discussion about CSR in Turkey, see Knudsen 2015.
- 10. http://beyazgazete.com/haber/2018/5/15/vedas-a-sosyal-sorumluluk-odulu-4487978 .html, accessed 23 January 2018.
- 11. https://www.statkraft.com/globalassets/1-statkraft-public/media/pp\_2\_2017\_engelsk
- 12. https://www.statkraft.com/annualreport2015/Corporate\_Responsibility/Managingcorporate-responsibility/Competence-and-training/, accessed 25 March 2019.
- 13. https://www.globalreporting.org/standards/.
- 14. See Welker 2014 and Sydow 2016 for more nuanced studies of CSR and standards.

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