




Passing on pot: when environmental organizations disengage from political consumerism in highly stigmatized sectors

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ABSTRACT

Environmental movement organizations (EMOs) contribute to and benefit from political consumerism initiatives, such as voluntary sustainability certifications (VSCs). Surprisingly, EMOs have avoided America's fastest growing agricultural sector: newly legalized cannabis (marijuana). Drawing on qualitative mixed methods – interviews with cannabis supply chain actors and legalization advocates, industry event participation, desk-based research, and dispensary visits – I analyze the nine voluntary sustainability certifications that have emerged to facilitate political consumerism in the US cannabis market to identify the conditions under which EMOs eschew political consumerism, and the consequences thereof. EMOs may avoid ethical consumerism initiatives in countercultural sectors because endorsing stigmatized products/lifestyles or challenging existing ethical frames may create reputational risk. Without the expertise, accountability, and resources EMOs typically provide, VSCs may stagnate or ignore best practices of standards-setting, auditing, and governance. Stigmatized sectors may be highly susceptible to industry capture, compromising the potential of political consumerism as a vehicle for environmental change.

KEYWORDS Environmental movement; political consumerism; sustainability; voluntary certification; cannabis; marijuana

Introduction

A burgeoning multi-disciplinary literature describes and explains the ways in which environmental movement organizations (EMOs) and political consumerism initiatives engage one another. 'Political consumerism' refers to the use of market mechanisms and consumer actions to challenge ethically, environmentally, or politically objectionable institutions and dynamics (Boström *et al.* 2018, Diani 2018). Since the 1992 Rio Summit, EMOs have increasingly leveraged political consumerism to achieve environmental goals (Graziano and Forno 2012, Balsiger 2014, Forno and Graziano 2014, Schlosberg and Coles 2016). EMOs can do this in a variety of ways, including: framing

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consumption as an environmental act, empowering consumers to modify their habits, mobilizing resources to pressure businesses, and emphasizing solidarity among seemingly disparate actors within globalized supply chains (Raynolds 2000, Forno and Graziano 2014).

Here, I develop new understandings of the relationship between EMOs and political consumerism in two ways. First, I seek to develop our understanding of the interactions between EMOs and a particular type of political consumerism: voluntary sustainability certifications (VSCs). VSCs are a form of non-state regulation in which private sector activities are audited against social and environmental standards set by a non-governmental (typically multi-stakeholder) body. Examples include the Forest Stewardship Council, the Roundtable for Sustainable Palm Oil, and Fairtrade International. EMOs have played a central role in establishing VSCs, governing them, monitoring standards, and evaluating outcomes. Many studies identify VSCs as an important and common strategy through which EMOS carry out their missions, and credit EMOs for pushing VSCs to be more rigorous, credible, and effective (Bernstein and Cashore 2007, Gulbrandsen 2009, Reinecke *et al.* 2012, Fischer and Lyon 2014, van der Ven 2015, Bennett 2016, Darnall *et al.* 2017). Second, I situate these interactions in the context of the emerging US cannabis market, which enables problematization of the relationship between EMOs and political consumerism under the conditions of recent legalization and enduring stigmatization. Given the ubiquity of VSCs – across regions and sectors – one could quite reasonably expect EMOs to create or adopt voluntary standards for this emerging supply chain. This is particularly so for two reasons: First, the the historical association between cannabis, countercultural movements, and environmentalism (Davis 2015, Hudak 2016); Second, the potential for cannabis cultivation to adversely affect natural resources and the environment (Butsic and Brenner 2016). However, this is precisely what makes the case of cannabis in the USA so interesting: EMOs and the VSCs they support are not involved (Bennett 2018b).

Although cannabis remains an internationally controlled (illegal) substance (UNODC 2016), several states and sub-national regions have recently legalized its cultivation, distribution, and consumption for non-medical purposes (referred to as ‘adult’ or ‘recreational’ use). Uruguay and Canada legalized in 2013 and 2017, respectively; Mexico decriminalized in 2018; and now most of the US population lives in a state where adult use cannabis is legal. Although this trend is not ubiquitous, in these and many other places, some argue that cannabis has ‘gone mainstream’ (Hudak 2016). Like any agricultural product, cannabis can generate negative environmental consequences and VSCs have an important role to play. This is especially true in the United States where the cannabis market is large and expanding, yet remains federally illegal. In this context, environmental

lobbying is less efficient and may have uneven impacts because all policy-making occurs at the state level. In other products, organic certification has helped consumers to demonstrate support for more rigorous standards, as evidenced by a growing demand for organics (OTA 2019). However, the US Department of Agriculture (USDA) cannot permit the National Organic Program to develop standards for a federally prohibited substance. These contextual factors have generated exactly the type of regulatory vacuum that EMOs created voluntary certifications to avoid. Yet, EMOs and their VSCs have not, in fact, extended their certifications to cannabis. This is largely because they believe the sector is negatively stigmatized, and they may consequently risk losing stakeholder support if they attempt to develop or support VSCs for cannabis (Bennett 2018b). It is important to understand that for nearly a century, United States policy makers have weaponized drug policies as a strategy for institutionalizing racism. These policies and the accompanying stereotyping and scapegoating campaigns,¹ often supported by popular media, were so successful in entrenching cannabis stigmatization that even today medical consumers face discrimination and marginalization (Hathaway *et al.* 2011, Hudak 2016).

Despite robust consumer demand for sustainable products, therefore, the political consumerism of cannabis is defined in the US by the USDA's inability to offer organic certification, VSCs' unwillingness to apply existing certifications, and EMOs' reluctance to associate with a stigmatized sector (Bennett 2018b, 2018c). In this unique empirical context, I develop our understanding of the wider relationship between EMOs and VSCs. Indeed, while extant studies focus on why and how EMOs *engage* political consumerism, and the consequences of this engagement, here I examine why and how EMOs may *avoid* political consumerism and VSCs, and identify and discuss the consequences of EMO *absence* on political consumerism and VSC initiatives.

My analysis is largely based on interviews with the founders of nine cannabis VSCs. I also draw on previous field research conducted at 64 dispensaries and about a dozen industry events, and conversations with scores of supply chain actors and legalization advocates. The analysis suggests that EMOs are averse to participating (even in seemingly low-risk ways) in stigmatized sectors. I argue that EMOs may avoid ethical consumerism initiatives in countercultural sectors because endorsing stigmatized products/lifestyles and promoting products that challenge existing ethical frames may create reputational risk. I discuss the potential implications for other marginal industries such as sex work, tobacco, and green burials. The findings also suggest that even in a sector that is highly unorganized (into business associations, large conglomerates, and sector-specific service providers), private sector interests may compromise VSCs' abilities to create standards, audit systems, and governance structures that

privilege environmental objectives over business interests. Without EMOs and the expertise, accountability, and resources they provide, VSCs may also fail to adopt best practices, have limited opportunities for professional networking and leadership development, and lack venues for learning and sharing ideas. Overall, I argue that the absence of EMOs may compromise the potential of market-based activism.

In what follows, I discuss the important role that EMOs can play in voluntary certifications, and highlight the importance of understanding the conditions and consequences of disengagement. I then set out the selected case of legal cannabis in the United States, along with my data collection and analysis methods from nine certification programs. I then summarize the findings, focusing on whether and how EMOs found, organize, lead, support, lobby, or otherwise engage cannabis certifications. The discussion draws on these findings to identify the conditions under which EMOs may disengage, and the consequences of doing so.

Voluntary sustainability certifications and political consumerism

Voluntary sustainability certifications (VSCs) are one of the most pervasive and powerful engines of political consumerism. They emerged in the 1990s when many states rolled back social and environmental regulations to usher in a new era of globalized free market capitalism. In response, activists sought new ways to improve the social and environmental impacts of multinational corporations, international trade, and/or globalized production networks. VSCs establish standards and auditing procedures, and verified suppliers and brands use labels to differentiate their products in the marketplace. Examples of VSCs include the Forest Stewardship Council (FSC, est. 1993), Marine Stewardship Council (MSC, est. 1999), and the Roundtable on Sustainable Palm Oil (RSPO, est. 2004). Scholarship on VSCs has conceptualized them as non-state, market-driven governance (Cashore 2002), non-state certification systems (Bartley 2007), competitive supragovernmental regulation (Meidinger 2011), market-based private regulation (Büthe and Mattli 2013), and multi-stakeholder initiatives (Cheyns and Riisgaard 2014).

Over the past two decades, certifications have played an increasingly important role in environmental politics and political consumerism (Van't Veld and Kotchen 2011, Reinecke *et al.* 2012, fig. 1, Brown 2015, Foley 2017, Eco-label Index 2017, Bennett 2018a). Optimistic assessments assert that VSCs strengthen transnational economic regulation and ratchet up social and environmental standards (Abbott and Snidal 2009, Overdevest 2010). More critical accounts warn of overstated claims, diluted standards, and hegemonic power dynamics (Loconto and Fouilleux 2014, Bennett 2017, 2018a). Because VSCs transfer the burden of values creation and

product evaluation from individual consumers to standards-setting organizations, the question of *who sets voluntary standards* – which perspectives are privileged and why – is a key concern (Bennett 2017). This study contributes to the line of research focused on whether and how EMOs may serve as a counterweight to industry interests in this context.

EMOs and the politics of voluntary standards-setting

EMOs can engage and influence VSCs and their standards in a number of ways. First, EMOs can create markets for certified products, such as grass-fed beef, sustainable coffee, or organic produce, by focusing on consumer education and bolstering demand (see Dubuisson-Quellier 2015, Reinecke *et al.* 2012). Second, EMOs provide advice to VSCs by serving as board members and suggesting revisions to standards (Klein and Winickoff 2011, Bennett 2018a). The American Bird Conservancy, for example, has advised the Sustainable Forestry Initiative (SFI), a forest certification that competes with FSC (Carmin *et al.* 2003). In doing so, they can mitigate the risk of industry capture, which can occur when regulators and industry actors work in close consultation (Slayton and Clark-Ginsberg 2017). Third, EMOs can help organizations learn from each other's experiences and incentivize best practices by offering financial contributions, public endorsements, institutional connections, and training opportunities (Gulbrandsen 2009, Fransen 2012, Reinecke *et al.* 2012). Fourth, EMOs can hold certifications accountable to their environmental missions and prevent a 'race to the bottom' by naming and shaming green-washing VSCs and acting as watchdogs for the companies that use them (Bartley 2007, Fischer and Lyon 2014, Gulbrandsen 2014, Bennett 2016). In 2005, for example, the Sierra Club and other EMOs publicly critiqued the SFI by publishing a full-page ad in the *New York Times* that read, '[SFI] is a historic greenwashing effort to blur the public's trust in ecolabeling, helping loggers appear "sustainable" when it's really just the Same-old Forest Industry' (in Fischer and Lyon 2014, p. 693). Fifth, and more generally, EMOs can shape VSCs by altering the contexts in which they emerge and compete for market share (Auld 2014, Gulbrandsen 2014, Henriksen 2015, Laurent 2015).

Finally, and perhaps most critically, EMOs can shape VSCs by initiating them. In forestry, for example, Greenpeace and the World Wide Fund for Nature helped to establish the Forest Stewardship Council (FSC) to set standards for responsible forest management (Cashore *et al.* 2004). A robust literature suggests that VSCs established by EMOs are more likely than those established by industry actors to focus on environmental mission, choose strategies likely to facilitate meaningful impact and, ultimately, generate more significant environmental benefits (Bernstein and Cashore

2007, Gulbrandsen 2009, Reinecke *et al.* 2012, Fischer and Lyon 2014, van der Ven 2015). As Darnall *et al.* (2017, p. 4) write:

Instead of promoting genuine environmental improvement, an industry-sponsored ecolabel might therefore provide an opportunity for firms to symbolically respond to consumers' preferences for environmentally [conscious] products by creating the appearance, but not the substance, that products are actually better for the environment.

Industry-initiated VSCs not only generate less rigorous certifications, but their presence on the marketplace can lead more robust VSCs to depress their own standards in an effort to compete for market share (Fischer and Lyon 2014, Li and van 't Veld 2015).

EMO vs. industry-led certifications

The ways in which VSC founders understand a sector's problems – and see certification as a solution – can lead them to develop different strategies (Auld 2014, Bennett 2016), and those early choices can create path dependencies that have lasting legacies (Cashore *et al.* 2004, Gulbrandsen 2009, Auld 2014). EMO and industry founders may have different motivations for developing VSCs (Carmin *et al.* 2003, Darnall *et al.* 2017). Thus, industry associations aim to promote member interests, such as maximizing profits, gaining market access, addressing public concerns, and marketing 'green' attributes (Bernstein and Cashore 2007, Li and van 't Veld 2015). The VSCs they create are often theorized as 'green clubs' – 'green' because they aim to generate environmental public goods, and 'clubs' because they provide non-rival but excludable reputation benefits to participating firms (Potoski and Prakash 2005, Van't Veld and Kotchen 2011). While industry-initiated VSCs may promote cross-firm collaboration around environmental issues (e.g. Fiorino and Bhan 2016), they may also be more likely to facilitate regulatory capture than EMO-initiate VSCs, which tend to focus on environmental outcomes (Schleifer 2013, Darnall *et al.* 2017).

Industry- and EMO-initiated VSCs may be accountable to actors with different priorities (Brown *et al.* 2012). Industry-initiated VSCs report to for-profit businesses and thus may face pressure to minimize costs of compliance (Fischer and Lyon 2014, Li and van 't Veld 2015, van der Ven 2015). EMO-led certifications, on the other hand, may be accountable to environmentally-oriented donors, and thus face pressure to deliver environmental impact (Reinecke *et al.* 2012). Industry- and EMO-founded VSCs may also differ in their approach to engaging stakeholders – the actors who affect or are affected by their work, such as farmers, factory workers, civil society organizations, unions, technical experts, industry associations, or corporations (see Potts *et al.* 2014, p. 60, Bennett 2017).

Genuine engagement not only permits stakeholders to participate, but also offers opportunities to exert influence over outcomes (Henriksen 2015, Bennett 2016, 2017). Industry-initiated VSCs may include EMOs to maintain mission integrity, minimize future conflict, or bolster legitimacy. However, they are less likely than EMO-initiated VSCs to allow mission-driven stakeholders to influence outcomes (Carmin *et al.* 2003, Bütthe and Mattli 2013, p. 220).

Overall, extant research thus suggests that EMOs can have a significant effect on the contours and success of political consumerism by founding or influencing voluntary sustainability certification programs. This conclusion draws on empirical studies of sectors that are well established, VSCs are well formed, and business associations exist. Existing theory does not address the questions: Under what conditions do EMOs engage in or disengage from political consumerism? And, when EMOs do not engage, what are the consequences? This study examines whether and how EMOs engage in political consumerism – through VSCs – in a newly legalized, stigmatized sector without strong business associations. It does so by drawing on the case of VSC initiation in the US cannabis sector.

The cannabis sector: typical and atypical attributes

In some ways, cannabis is very much a typical agricultural product. However, aspects of its legal status, organization, cultural acceptance, and relationship to organic certification distinguish it from other sectors.

Semi-legalized

In the United States, cannabis is newly (and not entirely) legal. Several states have legalized cannabis through voter referendums, despite its federally illegal status. California was the first state to legalize cannabis for medicinal purposes (in 1996) and Colorado was the first state to legalize for adult use (in 2012). In 2013, the US Department of Justice responded to the conflict between state and federal law by announcing that it would defer cannabis regulation to state legislatures. Today, 28 states have legalized medicinal cannabis, and nine of those have also legalized adult use cannabis. In each state where cannabis is legal, both growers and retailers ('dispensaries') must obtain a license, the requirements for which differ among states. California produces more cannabis than any other state, with almost all production and sales occurring on the illegal market (Caulkins *et al.* 2012). Its 2017 vote to legalize adult use cannabis has already dramatically affected the industry. In 2019, 98.6% of the US population lives in states with some form of legalized cannabis access (New Frontier Data 2019).

Unorganized

The cannabis industry, unlike many other sectors, does not have long-standing, well-established industry associations that aim to solve collective action problems and promote industry interests. Until Colorado legalized cannabis for adult use consumption, most state and national cannabis organizations focused instead on legalization (2018c). Although numerous networks, coalitions, non-profits, and consulting groups have emerged to facilitate dialogue, organization within the sector is still relatively decentralized and nascent, relative to other industries. To illustrate, the National Association of Cannabis Businesses, established in 2017, self-identifies as ‘the first and only self-regulatory [membership] organization in US cannabis’ (NACB (National Association of Cannabis Businesses) 2018).

Stigmatized

More than half of the total population of the United States has consumed cannabis, more than 80% support legalization for medicinal use, and about half the country supports adult use legalization (Marist 2017). Yet, cannabis remains highly stigmatized. Consumers, producers, organizations, and others affiliated with the industry facing barriers to personal and professional development (Hathaway *et al.* 2011). Indeed, much of the legalization effort was focused at convincing policy makers and the public that cannabis consumers maintain typical, productive, healthy, ‘normal’ lifestyles (2018c).

Environmental issues and organic certifications

Cannabis cultivation, like any crop, can have devastating environmental impacts: water requirements are intense (Philpott 2014), synthetic pesticides and fertilizers are heavily used (Sullivan *et al.* 2013, Voelker and Holmes 2015, Subritzky *et al.* 2017), and indoor growers require energy for sun lamps and to heat/cool, humidify/dehumidify, ventilate, and irrigate (Mills 2012). Environmentalists argue that, like other agricultural sectors, cannabis regulations fall short of protecting the environment (e.g. Rejeski 2017). However, unlike other agricultural sectors, the USDA National Organic Program (NOP) will not create a standard for cannabis because of its federally illegal status. Illegal use of the Organic label can result in a fine up to USD \$11,000 (Crombie 2015). Given the boom in demand for organic products in the United States (USDA 2017) and the inadequacy of public regulations, it is not surprising that several VSCs have emerged to fill this void (Gulbrandsen 2009, p. 29).

Data and methods

In this study, I analyze the nine non-governmental VSCs that certify cannabis production, promote sustainability or the environment, and aim to operate in all states where cannabis is legally grown. I identified qualifying cases through Internet queries, snowball sampling, and previous field research, including participation in about a dozen industry events, interviews with two dozen cannabis supply chain actors and legalization advocates, and visits to 64 dispensaries (see Bennett 2018b, 2018c). In December 2017, I interviewed each VSC's founder or, in multi-founder VSCs, the founder currently holding the most powerful position (e.g. executive director). The phone interviews were semi-structured (see questions in [appendix A](#)) and averaged 87 minutes each, 13 hours total. I typed notes, generating a 16,483-word narrative, instead of recording because I wanted to decrease respondent inhibitions (Roulston 2010, ch.5) and because exact syntax is not required for process (thematic) coding, as it is for in vivo (actual language) analysis (Saldana 2011, ch.4).

To organize the data, I first wrote a descriptive narrative of each VSC's timeline, organizational identity, stakeholder engagement, and standards/auditing system. In the first cycle of coding, I engaged the method of 'theming the data' (Saldana 2009, ch. 3) to identify (by reading the data and using keyword searches) repeated direct observations and underlying phenomena, such as 'comments on the tradeoff of rigorous standards versus accessible standards.' In the second cycle of coding, I used these themes to develop 25 'pattern codes' which were used to group cases according to various similarities and differences (Saldana 2009, ch. 4). Finally, comparative analysis was used to identify patterns across cases. For example, what features did all of the for-profit VSCs have in common, that were not shared by any of the non-profit VSCs? Overall, this analytic approach allowed me to engage in both inductive and deductive qualitative analysis, interrogating theories born both from the literature and from the empirical cases themselves. In the presentation of my analysis of cannabis VSCs, I omit founders' names and use gender-neutral pronouns, focusing attention on institutional features, as opposed to personal attributes.

Analysis

As of December 2017, there were nine voluntary sustainability certifications (VSCs) for cannabis growers in the United States: Clean Green, Kind Certified, Envirocann, The Cannabis Conservancy, Foundation of Cannabis Unified Standards, Cannabis Certification Council, Certified Sungrown, Humboldt Green, and Resource Innovation Institute (see [Table 1](#)), hereafter referred to as Clean, Kind, Enviro, TCC, FOCUS, CCC, Sun, Humb, and RII, respectively.

Table 1. Development of cannabis voluntary sustainability certifications (VSCs).

	VSC	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Growers
Established	Clean	I	SOA	A	A	A	C	C	C	C	C	C	C	C	C	C	C	225
	Kind								I	I	I	S	OAC	C	C	C	C	18
Emerging	Enviro								I	I	I	I	I	OS	AC	C	C	20
	TCC												I	OS	S	C	C	3
	FOCUS										I	I	O	S	S	A	A	0
	CCC												IO	O	A	A	A	0
Latent	Sun												I	OSAC	-	-	-	0*
Future	Humb		0	0	0	0	0	0	I	I	I	I	I	S	S	SA	SA	0
	Ril													I	O	O	O	0

I - Idea to develop a certification
 O - Organization legally formed
 S - Standards first drafted
 A - Audits (as pilot or for verification) first conducted
 C - Certification(s) awarded
 *6 growers were certified in 2015

Four currently certify growers (Clean, Kind, Enviro, TCC), two began certifying in 2018 (CCC, FOCUS), one certified only in 2015 (Sun), and two will launch certifications in the future (Humb, RII). Clean emerged first. The founder began developing the VSC in 2003 and certified the first grower in 2008. All of the other VSCs were conceived between 2010 and 2015 and began certifying in 2014 or later. Among the six VSCs that expect to certify in 2018 (Clean, Kind, Enviro, TCC, CCC, and Focus), the number of years between generating the idea and certifying growers ranges from 3 to 6 years, with an average of 4.7 years. The oldest VSC, Clean, currently certifies more growers (225) than the other three combined (Enviro 20 + Kind 18 + TCC 3 = 41). Based on these data, I consider the VSCs to be well-established (Clean), recently established (Kind, Enviro), emerging (TCC, FOCUS, CCC), latent (Sun), and future (Humb, RII).

Founders and organizational identity

None of the VSCs were founded or supported by a prominent EMO, multi-sector VSC (e.g. Rainforest Alliance), or national cannabis association. Eight of the VSCs were developed by individual(s) who established a new organization to manage the VSC. The remaining VSC (Humb) was created by a local industry/community association led by a small group of founders. Thus, individuals played a significant role in shaping VSCs, relative to organizations.

Each founder described multiple motivations for establishing a VSC. None of the founders' motivations were unique among the group. Five themes emerged: professionalization; health, safety, and the environment; organic integrity; product differentiation; and the threat of conventional agriculture. First, the founders aimed to professionalize and legitimize the industry, to help growers to see themselves – and to be seen by others – as legitimate, serious, responsible, accountable members of the agricultural community. They created VSCs in order to give cannabis growers the services, opportunities, and incentives available to growers of other crops. Second, founders expressed a desire to promote worker safety, consumer health, and environmental conservation. Many cited instances in which lax or absent regulations perpetuated unsafe practices, such as inadequate electrical infrastructure for grow lamps (a fire hazard) and inappropriate applications of pesticides (a threat to the ecosystem, farm workers, and consumers). Third, founders aimed to maintain the integrity of 'organic' labeling and the organic movement by providing an alternative to unsubstantiated false claims. Fourth, founders wanted to incentivize movement into the legal sector, where growers would be subject to regulations and enforcement that could reduce environmental damage, corruption, and crime. They argued that helping growers to learn about

sustainable production and differentiate products in the marketplace might help them to increase profitability on the legal market, and transition out of the illegal market. Fifth, founders identified cannabis as a large and growing industry with potential to replicate the resource-consumptive patterns of industrial agriculture, and were motivated by the opportunity to alter the trajectory of a new crop.

When asked about their relevant professional, educational, and life experiences, none of the founders reported managing or launching a VSC. However, all but one (FOCUS) had experience related to sustainability, such as organic auditing, sustainability consulting, corporate environmental responsibility, permaculture education, and natural resource management. All of the founders described ways in which their experiences informed their approach to establishing a new VSC (see [Table 2](#)). Three of the founders (Clean, Kind, Enviro) were USDA NOP auditors. Their VSCs interpret and audit against the USDA NOP standard and are modeled after accredited organic auditing firms, such as Oregon Tilth. Although they did not identify as standards-setters, each has modified the USDA standard. For example, Clean includes carbon footprint requirements, Kind requires workers have the right to bargain collectively, and Enviro mandates frequent pesticide testing for all growers. Their approaches vary slightly. Clean identifies as a farmer-centric environmental organization that aims to professionalize the cannabis industry and support legal growers and the cannabis community. The founder draws on their experience providing legal advice to agricultural businesses. Kind identifies as a professional service provider committed to empowering cannabis growers who want to grow organically by offering expert advice and certification services. The founder draws on their experience interpreting standards across cultures and languages. Enviro identifies as an environmental regulator and educator, aiming to educate growers, promote pesticide testing, and build consumer awareness. The founder draws on their experience with agricultural education. Overall, all of the founders who were previously USDA NOP auditors created VSCs that aim to operate like auditing organizations, but with slightly different approaches.

Two of the founders (TCC, FOCUS) conducted research on VSCs and accreditations in other sectors, and modeled their VSCs on what they identify as best practices. TCC identifies as an environmental certification body. Its founder looked to the ISEAL Alliance, a rigorous accreditation body for social and environmental standards-setting organizations, for best practices and guidelines for an organizational model. They also drew heavily on their education and experience in sustainable urban agriculture entrepreneurship. Their principal aim is to alter the industry's impact on the environment. FOCUS is modeled after CARF, a nonprofit accreditor of health and human service providers, and the founder identifies it as an

Table 2. Founders, models, and organizational identity.

VSC	Founder	Organizational Identity	Model	Form
Clean	Grew up on a farm, studied agriculture and law, and built a career in organic auditing , environmentalism, and legal advising.	A farmer-centric environmental organization that provides organic auditing, environmental education/incentives, and legal services to cannabis growers.	USDA NOP accredited auditors (e.g., Oregon Tilth)	For-profit
Kind	Grew up on an organic family farm, built a career in interpreting organic standards for new contexts and organic auditing .	A professional service provider that translates organic standards and audits organic standards in the new context of cannabis.		
Enviro	Grew up in agriculture, studied sustainable farming, and built a career in agricultural education and organic auditing .	An environmental third-party regulator that educates farmers and audits against organic standards.		
TCC	Studied sustainability and urban agriculture at the graduate level, and built a career at the intersection of public, private, and non-profit sectors.	An environmental certification body that adheres to global best practices for standardization and sustainability certifications.	Sustainable agriculture certifications (e.g., ISEAL)	Non-profit
FOCUS	Developed a business management skillset in the pharmaceutical industry and with mental health non-profits and more recently in cannabis.	An independent regulatory body that aims to bring the safety-oriented regulations, standardization, and consensus-based standards-setting typical of other industries to cannabis.	Independent industry accreditors (e.g., CARF)	
CCC	Grew up in a political family and built a career in civic engagement , public policy, business consulting, and entrepreneurship.	An industry association with environmental implications that educates the public and improves transparency in cannabis production.	Business associations and cooperative marketing schemes (e.g., Cabot Creamery)	
Sun	Studied business at the graduate level, built a career in business and marketing , and has environmental experience.	A small business support group that educates consumers and connects them to small, environmentally-oriented cannabis growers through collective branding and marketing.		
Humb	Studied futurism at the graduate level and built a career focused on environmental responsibility in the private sector.	A community-oriented industry organization addressing environmental problems by facilitating collaboration among industry actors, university researchers, and technological innovators.		
RII	Built a career at the intersections of public, private, and non-profit sectors, often focused on sustainability in private sector activities.	A conservation non-profit that minimizes the cannabis industry's contribution to climate change through public-private partnership.		

independent regulatory body, as opposed to an environmental group or industry association. Although the environment is included in its mission, FOCUS is less focused on sustainability than TCC.

Three of the founders who have business, marketing, and/or entrepreneurship consulting experience created VSCs that aim to help sustainability-focused growers to learn from one another, engage in collective marketing, differentiate themselves in the marketplace, and create consumer demand through public education (CCC, Sun, Humb). CCC's founder is a politically active entrepreneur and business consultant. Their VSC is an industry association with environmental implications, focused on educating the public and supporting like-minded businesses. Sun's founder is trained in business and marketing and has experience in environmental work. Their VSC is a small business support group that educates consumers and connects them to small, environmentally-oriented cannabis growers through collective branding and marketing. The Humb founder is a futurist focused on environmental responsibility in the private sector. Their VSC is an industry and community organization that facilitates collaboration among cannabis businesses, researchers, and innovators to address environmental issues. Overall, CCC, Sun, and Humb's founders have private sector experience and created VSCs that support sustainability-focused growers.

Lastly, RII identifies as a conservation non-profit that aims to minimize the cannabis industry's contribution to climate change through research-based public-private partnership. The founder's career has focused on sustainability initiatives at the intersection of public, private, and non-profit work, and their VSC aims to build similar opportunities for the cannabis industry. Overall, cannabis VSCs identify as organic auditors (Clean, Kind, Enviro), a multi-stakeholder environmental standards-setting organization (TCC), an independent industry regulator (FOCUS), environmentally-oriented business/marketing/community organizations (CCC, Sun, Humb), and a conservation organization (RII). Each model draws on the founder's experiences and knowledge about certifications in other sectors.

The VSCs are divided between for-profit and non-profit structures. The three organic auditors are for-profit: Clean is a corporation; Kind and Enviro are Limited Liability Companies (LLCs). The others are non-profits. With one exception (Sun, which is latent), all of the VSCs supplement their certification revenue by selling other services: Clean, Kind, and Enviro verify and label compliant agricultural inputs; Clean also offers legal and real estate consulting; CCC and Humb host industry events; TCC offers research services; FOCUS provides license application support and compliance gap analysis; and RII stands alone in being organized as a membership organization, receiving funding through membership fees paid by anyone (individuals or businesses) who

would like to contribute. In each case, the founder donated their time and/or money to launch the VSC. Many shared that doing so had come at the cost of personal financial hardship. Only CCC reported receiving a small foundation grant to help with start-up costs.

EMOs in governance and standards-setting

Although the VSCs' governance structures are diverse – and many are still under development – at this point no VSC follows established best practices. Overall, EMOs are less represented than industry actors in governance bodies and standards-setting processes. As described in [Table 3](#), two VSCs are single-founder owned and led (Clean, Kind); three are run by a group of founder(s), some who now identify as the board (Enviro, CC, Sun, Humb); two are led by boards that include founders and others (TCC, CCC); and two are led by the founders, with advice from a board, advisory council, and technical committees (FOCUS, RII). The VSCs' leadership teams also operate as the standards-setting bodies, with two exceptions: FOCUS uses a consensus-based multi-stakeholder decision-making process; and RII has not yet developed a system. With one exception, the VSCs' leaders and contracted staff conducted the audits after signing conflict of interest forms. FOCUS is the only organization whose auditors are employees of accredited third-party certification firms (e.g. SGS, Control Union). Six of the VSCs' boards have vested interests in the cannabis industry, meaning they own, invest, or sell services to cannabis businesses (Enviro, FOCUS, CCC, Sun, Humb, RII). TCC is the only VSC that is both non-profit and free of vested interests on its board. One founder shared that, in their experience, although some individuals and institutions are unwilling to publicly or formally engage, they are willing to provide advice in private.

The VSCs' standards varied in terms of scope (what is audited), type (binary, tiered, or developmental), and approach to the trade-off between rigorous standards and smaller market share (see [Table 4](#)). All reported that their VSCs are limited to licensed growers selling in the legal sector, and that standards were, are, or will be on the website or available by request. Most of the certifications have standards for soil (e.g. inputs), energy, water, and at least one other area. Four have established multiple tiers, that allow growers to obtain a certification without reaching the VSC's highest standards, while three have established non-tiered systems and two are undecided. Of the eight soil standards, seven claim to be similar to USDA DOP or IFOAM (International Federation of Organic Agriculture Movements) organic. Five of the VSCs (Clean, TCC, FOCUS, Humb, RII) require that growers improve on some aspect(s) from year to year to maintain certification. Overall, no two VSCs have the same scope, type, and approach to



Table 3. Leadership, standards-setting, and auditing.

VSC	Leadership	Standards-setting body	Auditing	Industry influence	EMO influence	For-profit
Clean	Founder	Founder (based on USDA NOP)	Founder + staff	None	Founder's background	For-profit
Kind	Founder	Founder (based on USDA NOP)	Founder + staff	None	Founder's background	
Enviro	Founders (board)	Founder (based on USDA NOP and Global Gap)	Founder + staff	Board has vested interests	Founders' backgrounds	
TCC	Board (founders + others)	Founders (based on IFOAM + stakeholder input)*	Founders + staff*	None	Board's backgrounds	Non-profit
FOCUS	Founder + Board + Advisory Council + Standards Committees	Consensus based, one committee is specifically focused on sustainability standards	Large, third party certifiers with global reach	Board has vested interests	Some committee members' backgrounds	
CCC	Board (founders + others)	Board	*	Board has vested interests	Board's backgrounds	
Sun	Founders (board)	Board	Board	Board has vested interests	Board's backgrounds	
Humb	Founders (board)	Founders	Founders*	Industry association-led; Board has vested interests	Founders' backgrounds	
RII	Founder + Board (founders + others) + Advisory Council + Technical Committee	*	*	Board has vested interests in industry	Board's backgrounds	

* Still in development / organization has plans to change this in the future

Table 4. Standards scope and strategy.

VSC	Scope					Tiered system with less restrictive lower tiers?
	Soil+	Energy	Water	Working and living conditions, carbon footprint^	Other	
Clean	Organic	Yes	Yes	Yes	Working and living conditions, carbon footprint^	Yes
Kind	Organic	Yes	Yes	Yes	Social justice, administration, processing	No
Enviro	Organic	No	No	No	Worker health/safety, regular pesticide testing	Yes
TCC	Organic^	Yes^	Yes^	Yes^	Administration, infrastructure, waste^	Yes
FOCUS	Organic	Yes	Yes	Yes	Worker health and safety, business management^	No
CCC	Organic*	No	No	No	Social criteria*	Yes*
Sun	Less restrictive than organic	Yes	No	No	No	No
Humb	Yes*	Yes*	Yes*	Yes*	Property improvement*^	Undecided
Ril	No	Yes*^	Yes*	Yes*	Carbon*^	Undecided

*Standard currently in progress or planned for future

+ Organic = Similar to USDA or IFOAM

^ Developmental – requires improvement year over year

standards-setting, and the diversity does not appear correlated with other features examined in this study.

Vulnerability to industry capture

This section presents the source and nature of VSCs' susceptibility to industry capture. Although each VSC is distinct, I present them in small groups to highlight common vulnerabilities. Overall, this analysis suggests that because VSCs have not engaged EMOs, implemented best practices, or become financially independent from the businesses they aim to regulate, cannabis VSCs are highly vulnerable to industry capture.

One third of the VSCs (Clean, Kind, Enviro) are organized as for-profit organizations whose owner(s) set standards, conduct audits, and direct the overall strategy of enforcing rules. These VSCs compete against one another for market share and some founders report instances of 'certification shopping' in which growers seek the most accessible certification instead of improving practices to meet higher standards. In this context, each VSC has an incentive to dilute standards or relax auditing procedures in order to gain market share and generate profit, and none have governance or transparency processes that would inhibit the owner from doing so. Although none of the founders identify their VSCs as standards-setting organizations (because they borrow heavily from IFOAM or USDA NOP), I suggest that because they interpret the standards (often differently), make adjustments, add water/energy/social provisions, and create less restrictive standards for a tiered system, they are indeed standards-setting organizations. According to VSC literature, these features – for-profit structure, lack of multi-stakeholder governance, opaque standards-setting processes, consolidation of standards-setting and auditing bodies, and competition for market share – may leave these VSCs at high risk for industry capture.

A second group of VSCs (CCC, Sun, Humb) are non-profits led by founders and/or board members with vested interests in the cannabis industry. They focus on collective marketing, community building, industry networking, and consumer education. Like the organic models, they consolidate leadership, standards-setting, and auditing. Their boards or leadership teams are comprised almost exclusively of sustainability-focused individuals from within the cannabis industry (as opposed to environmental advocates). The VSC literature suggests that these features may leave these VSCs at high risk for privileging business objectives over environmental outcomes.

The remaining VSCs are all non-profits developing multi-stakeholder boards and transparent standards-setting processes. These are considered best practices in sustainability standards-setting, so their vulnerabilities to industry capture emerge from other areas. The founder of FOCUS aims to

emulate the accreditation agencies that exist in other industries, as opposed to pushing for more progressive environmental standards. By employing consensus-based standards setting, they do not take responsibility for standards content and are not evaluating the extent to which standards further the organizations' environmental mission. This may leave the organization open to replicating the modest environmental standards that exist in other industries. Although TCC's governance and standards-setting processes are still in development, the organization's certifications are underway, raising questions about when (and whether) intended best practices will be implemented. Finally, RI's vulnerability comes from its membership structure, which allows anyone (industry, environmental, or others) to join and may result in financial dependency on industry actors and, as a result, industry co-optation.

Several features at the organizational field level of analysis also suggest that cannabis VSCs may be prone to engage in a 'race to the bottom.' First, there are few incentives for cannabis VSCs to race to the top. According to founders, EMOs and philanthropic foundations 'won't touch' cannabis. With the exception of one modest grant, none of the founders have received much external support. Although most founders modeled their VSCs in the image of 'successful' or familiar examples (from other sectors), without the coercive pressures of donors, regulators, or watchdogs, they fall short of comprehensively adopting best practices and insulating themselves against industry influence. Second, there are few deterrents against cannabis VSCs engaging in competitive standards dilution – VSCs that cut corners are unlikely to be caught. Watchdog organizations, accountability activists, or committed companies are not watching, naming, and shaming green-washing VSCs and the companies that use them. Third, the legacy of prohibition compromises the ability of consumers, producers, and VSCs to engage in best practices of ethical consumerism. Consumers accustomed to purchasing on the illegal market may not be in the habit of asking questions about the supply chain. VSCs still lack access to traditional financial services and small business loans, and believe they are unlikely to receive environmental grants (and thus do not apply). As a result, most VSCs supplement revenue by selling other services – such as licensing application support, legal advice, research, and agricultural input endorsements – to industry actors. In doing so, VSCs strengthen relationships and dependence on industry actors, as opposed to demonstrating environmental mission to donors.

Discussion and conclusions

Existing studies on the role of EMOs in political consumerism focus on sectors in which EMOs engage some initiatives and business interests are organized. They aim to understand the nature and impact of that

engagement by comparing initiatives with more and less EMO engagement. This study compares those findings with an analysis of a sector in which EMOs are not engaged and business interests are not well organized.

The analysis confirms that most cannabis VSC founders are passionate about and have demonstrated commitment to sustainability. They create VSCs because they care about the environment and see an opportunity to work for change. Many describe personal sacrifice and financial hardship that have accompanied this choice. Yet, the revenue models, governance structures, and standards-setting processes they design do not necessarily privilege environmental issues over industry interests. Indeed, at conferences, in interviews, and at field sites, people have quietly shared with me their concerns about how some cannabis VSCs are making standards more accessible (and less impactful), compromising the credibility of audits, and privileging market share over impact. Even though business interests are not well organized in this sector, the absence of EMOs makes the sector vulnerable to industry capture. Without the support that EMOs typically provide, such as rewards for rigorous certifications, consequences for lax programs, and support in adopting best practices, the cannabis sector may be ripe for a race to the bottom.

The study's findings support the extant theory that EMOs play an important role in promoting best practices, preventing a 'race to the bottom,' and balancing against industry interests. It does so by showing how new VSCs, without EMO support, fail to learn from other sectors, compete via standards dilution, or protect themselves from industry pressures. It also extends political consumerism theory by suggesting that a counterforce (to industry interests) is necessary even in sectors without strong industry associations. It does this by illustrating how VSCs develop governance models and business plans that leave them vulnerable to the interests of for-profit actors, at the expense of their missions, even without being pressured to do so. Interestingly, it also points out the possibility that strong industry associations can play an important role in *supporting* VSCs in pursuing their missions, by offering research, networking, and education to consumers and supply side actors.

More widely, analysis also suggests two reasons why EMOs may not engage political consumerism initiatives in countercultural sectors or challenge existing frames, though more research is needed to better understand EMO decision-making. First, EMOs may believe that promoting non-mainstream consumption practices in stigmatized sectors – or 'doubling down' on counter-culture – may not be successful. In this way of thinking, political consumerism initiatives must simultaneously challenge the status quo whilst appealing to and recruiting individuals to participate. Working with counter-cultural products may upset the balance between being too radical to recruit and too mainstream to be distinct from typical practices

or public regulations. Second, EMOs may fear that the negative associations that popular culture applies to some products will also be applied to those who talk about, support, or engage those products, a phenomenon called ‘stigma contagion’ (Kirby and Corzine 1981). In the case of voluntary certifications, in which credibility as a private source of regulation is crucial for success, EMOs may believe that associating with a stigmatized sector will undermine legitimacy with key stakeholders. Leaders may also fear that they, personally, will be stigmatized in ways related to the product or sector. In short, EMOs may not engage stigmatized sectors because they perceive a risk of failure and/or reputational harm.

Analysis here suggests therefore that VSCs may be less likely to engage political consumerism initiatives when consuming or providing the product is, itself, a counter-cultural activity. Accordingly, this study points to several areas for additional research. First, a better understanding of EMO engagement in political consumerism in sectors which are stigmatized (e.g. sex work (Stryker and Pennington 2014, Gall 2016), tobacco farming); where EMO campaigns counter existing cultural frames (e.g. green burials, Yarwood *et al.* 2015, anti-mafia shopping maps, Forno 2015, condom distribution and promotion); or where political consumerism initiatives clash with existing ethical frames (e.g. oil and gas certification, electronic cigarettes), would help to refine theory on the conditions under which EMOs engage or eschew opportunities for political consumerism.

Second, more research on the ways in which EMOs consider and dismiss opportunities to engage in political consumerism would aid in developing a causal mechanism between identifying risk (or challenge) and choosing not to engage. What, more precisely, is problematic about some sectors or initiatives, for whom, and why? Third, more research on the potential benefits of industry associations to political consumerism may challenge the idea that EMOs and industry are working in opposition to one another. Fourth, further research on the development of VSCs in the cannabis sector would aid in understanding whether and how stigmas and their consequences endure and (if not) how EMO strategies evolve in the face of changing cultural norms. Finally, studies might examine whether and how EMOs have engaged the public policy making process, and how EMO involvement may have impacted outcomes.

Note

1. This extends to terminology: whilst ‘cannabis’ is the plant’s genus and is used in international treaties, ‘marijuana’ is often deployed within racist scape-goating campaigns (Hudak 2016, pp. 24–26).

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Appendix A. Interview questions

TIMELINE

1. In what year did the idea for this certification first emerge?
2. In what year did you formally establish the organization?
3. In what year was the first draft of the standards completed?
4. In what year was the first inspection/audit completed?
5. How many growers have been certified or are currently certified?

ISSUE #1: FOUNDERS

Research questions: Which types of actors initiate VSCs? What is their motivation for founding a VSC? In what ways are they related to industry actors or EMOs?

Interview questions:

6. How would you categorize your experiences prior to starting the organization? For example, did you have more experience working in the private sector—with farms, companies, industry associations, and businesses—Or was more of

your experience with environmental activism, community organizing—more in the non-profit sector?

7. What was your primary, most important motivation for starting this certification?
8. Once you had the idea for this certification, who were the three people, businesses, or organizations who had the greatest influence on how you developed the organization? Who were your three most important mentors?

ISSUE #2: ORGANIZATIONAL IDENTITY

Research questions: What type of VSCs do they create? What is the VSC's mission, identity, organizational form, and funding strategy?

Interview questions:

9. Do you consider your organization to be an industry association or environmental organization or something else?
10. What do you think sets your certification apart from other cannabis certifications?
11. Today, what is your organization's most important objective?
12. Is the organization a for-profit, non-profit, or something else?
13. How did you fund the start up activities that occurred prior to revenue from certification fees?
14. Today, how does the organization fund itself? In what ways could this funding strategy constrain (limit) standards?

ISSUE #3: STAKEHOLDER ENGAGEMENT

Research questions: To whom is the VSC accountable? Which stakeholders are engaged and how are the interests of different stakeholder groups balanced?

Interview questions:

15. Aside from yourself, who has the most influence over the organization's strategy today?
16. Is there a board of directors or other leadership team? If so, are the members associated with industry interests or environmental interests? How is leadership balanced between competing interests?
17. What is the standards-setting process and how does it balance growers' interests and environmental issues?

ISSUE #4: STANDARDS AND AUDITING

Research questions: To what extent do VSCs develop robust standards and stringent verification processes?

Interview questions:

18. Are the standards publicly available?
19. Are the environmental standards more rigorous than state regulations?
20. How do the standards compare to the USDA's organic standard?
21. Are there social standards? If so, are they more rigorous than what is required to be legally compliant?

22. How do you manage the tension between setting high standards that few growers will meet and lowering standards to attract more growers?
23. Can you describe a situation in which you had to choose between a standard or policy that would generate greater benefits to the environment or a standard that would be easier or more affordable for growers to adopt? What did you do?
24. Who audits? Do the auditors have conflicts of interest? For example, do they have personal relationships with the growers they audit? Or do they benefit if growers are in compliance?
25. Do you have a plan for monitoring and evaluating the impact of your program, and integrating results into revised standards?

OTHER

26. Are you aware of any other cannabis certifications that are not on my list [read list]?
27. Do you have any questions for me?