

Inclusive Labour Markets, Labour Relations
and Working Conditions Branch

***The International Labour Organization and the Living
Wage: A Historical Perspective***

Emmanuel Reynaud

Copyright © International Labour Organization 2017

First published 2017

Publications of the International Labour Office enjoy copyright under Protocol 2 of the Universal Copyright Convention. Nevertheless, short excerpts from them may be reproduced without authorization, on condition that the source is indicated. For rights of reproduction or translation, application should be made to ILO Publications (Rights and Licensing), International Labour Office, CH-1211 Geneva 22, Switzerland, or by email: rights@ilo.org. The International Labour Office welcomes such applications.

Libraries, institutions and other users registered with a reproduction rights organization may make copies in accordance with the licences issued to them for this purpose. Visit www.ifro.org to find the reproduction rights organization in your country.

ILO Cataloguing in Publication Data

Reynaud, Emmanuel.

The International Labour Organization and the Living Wage: A Historical Perspective / Emmanuel Reynaud; International Labour Office, Inclusive Labour Markets, Labour Relations and Working Conditions Branch. - Geneva: ILO, 2017.

(Conditions of work and employment series ; No. 90, ISSN: 2226-8944 ; 2226-8952 (web pdf))

ILO Cataloguing in Publication Data

The designations employed in ILO publications, which are in conformity with United Nations practice, and the presentation of material therein do not imply the expression of any opinion whatsoever on the part of the International Labour Office concerning the legal status of any country, area or territory or of its authorities, or concerning the delimitation of its frontiers.

The responsibility for opinions expressed in signed articles, studies and other contributions rests solely with their authors, and publication does not constitute an endorsement by the International Labour Office of the opinions expressed in them.

Reference to names of firms and commercial products and processes does not imply their endorsement by the International Labour Office, and any failure to mention a particular firm, commercial product or process is not a sign of disapproval.

Information on ILO publications and digital products can be found at: www.ilo.org/publns.

Printed by the International Labour Office, Geneva, Switzerland

Contents

	Page
Introduction	1
I. The Principle of a Living Wage	3
II. Implementation of the Principle in the First Decade	11
III. Implementation of the Principle in the 1960s	21
Conclusion.....	27
References	30
Conditions of Work and Employment Series.....	33

Introduction

The notion of a living wage appears at each of the key moments in the history of the International Labour Organisation (ILO), when the principles, the objectives and the priorities of the Organization were defined and stated. First, at the 1919 Paris Peace Conference, where the Part XIII of the Treaty of Versailles established the ILO as a permanent organization was drafted; then, at the 26th Session of the International Labour Conference in Philadelphia in April-May 1944, where the aims and purposes of the Organization were restated in view of the reconstruction years after a devastating war, which was still being waged; and, more recently, at the 97th Session of the International Labour Conference in Geneva in June 2008, where the ILO Declaration on Social Justice for a Fair Globalization was adopted to address the challenges of globalization. The objective, as it was stated, is to provide or ensure to all workers either “an adequate living wage”, in Part XIII of the Treaty of Versailles, or “a minimum living wage”, in the Philadelphia Declaration as well as in the 2008 Declaration, which just quoted the previous Declaration. But further to these solemn statements, the concept of a living wage does not appear in ILO’s instruments related to the closely linked question of minimum wages, which concern the machinery of “minimum wage fixing”.

Recently, there has been a renewed interest in the living wage, notably among multi-national enterprises and NGOs, and the British government decided to introduce a new so-called “National Living Wage” (the name given to the national minimum wage) in April 2016. In 2008, a very comprehensive historical overview was done on the role of the ILO in the development of minimum wages (Marinakis 2008). This paper also adopts a historical perspective. The objective is first to see how the principle of a living wage was initially adopted and how it was understood. And then, to review how the principle was implemented, what it meant, how it evolved, what type of issues and dilemmas it raised in subsequent ILO work and in the debates among ILO’s constituents.

The paper is structured in three parts. The first part reviews the process and the debates related to the adoption of the principle of a living wage at the 1919 Paris Peace Conference and when it was restated in Philadelphia in 1944. The two following parts deal with the implementation of the principle. The second part reviews the initial work of the International Labour Office (the Office) and the debates among the ILO’s constituents that led to the adoption of the Minimum Wage-Fixing Machinery Convention, 1928 (No. 26) and the corresponding Recommendation (No. 30). It also presents examples of countries which used the concept of a living wage in their legislation regarding minimum wage fixing. The third part reviews the renewed debates on minimum wages in the 1960s at the ILO Governing Body and at the International Labour Conference, which led to the adoption of the Minimum Wage Fixing Convention, 1970 (No. 131) and the corresponding Recommendation (No. 135). It can already be noted that from the beginning the notion of a living wage was linked to that of a minimum wage, and we will see how the principle, from an objective, became a criterion among various criteria in minimum wage fixing and was finally subsumed under the criterion of the “needs of workers and their families”.

I. The Principle of a Living Wage

1. Part XIII of the Treaty of Versailles, 1919

Part XIII of the Treaty of Versailles comprises two sections: Section I that includes a preamble and establishes the International Labour Organization as a permanent organization, and Section II which defines the general principles and identifies nine principles of “special and urgent importance”. The “living wage” is explicitly mentioned in the preamble and indirectly in Section II, among the nine principles constituting what was called at the time the “Labour Charter” or the “Labour Clauses” (the article 427 of the Treaty, which became the article 41 of the ILO Constitution). The final wording of these two references to a living wage is as follows:

In the preamble: “[...] whereas conditions of labour exist involving such injustice, hardship and privation to large numbers of people as to produce unrest so great that the peace and harmony of the world are imperilled; and an improvement of those conditions is urgently required: as, for example, [...], the provision of *an adequate living wage*¹, [...].”

Article 427: “Third. – The payment to the employed of a wage adequate to maintain a reasonable standard of life as this is understood in their time and country.”

The process which took place in Paris at the Peace Conference in 1919 is well documented in two volumes edited by James T. Shotwell (1934a and 1934b), who participated in the Conference as part of the United States Delegation. Even though the English stenographic record was destroyed, without transcription, by order of the British Delegation (Shotwell 1934b, p. 149), the delegation which played a prominent role in the Conference, there is still a wealth of information available on the process and the debates among the delegations. The process that led to the adoption of the final text started by the work of a commission appointed by the Peace Conference, the Commission on International Labour Legislation (see Phelan 1934a). It was composed of two representatives from each of the five “Great Powers”, that is the United States, the British Empire, France, Italy and Japan, and five representatives of “other Powers” represented at the Peace Conference, two from Belgium and one from Cuba, Poland and Czechoslovakia. The Commission produced a report in two parts, corresponding to what became the two sections of Part XIII of the Peace Treaty. The first part is a “Draft Convention containing provisions for the establishment of a permanent organisation for international labour legislation”. The second part is “in the form of clauses containing declarations of principle in regard to a number of matters which are of vital importance to the labour world” (ILO 1920a, p. 3). The report of the Commission was presented at a Plenary Session of the Peace Conference, where the proposed text was revised and incorporated into the Treaty of Versailles (see Phelan 1934b). The issue related to the principle of a living wage, according to the available documents, gave rise to little discussion and debate; still, there are some elements worth mentioning.

The work on the first part of the report of the Commission, the Convention, was based on a draft prepared by the British Delegation. In the preamble of the initial draft, among the conditions of labour requiring urgently an improvement, there was already “the provision of a living wage”. In the text revised by a drafting committee, it became “the provision of an adequate living wage”, and this wording was kept in the text adopted by the Commission (Shotwell 1934a, pp. 372-373). Phelan gives no explanation for this change, he just notes that: “Few changes were made in the Preamble, but one of them, proposed by Mr. Vandervelde [Minister of Justice and of State of Belgium], is of great interest as introducing the two words which have been so often

¹ Emphasis added.

used to define the main object of the Organization, namely, “social justice”.” (Phelan 1934a, p. 132).

It should also be noted that in French, the second official language of the text, equally authoritative, the formulation is slightly different and is somehow more explicit. The initial British draft translated “a living wage” into “un salaire suffisant pour vivre”. In the Commission, Mr. Vandervelde, in the name of the Belgium Delegation, proposed to replace this wording by “un salaire vital” or “un salaire normal”. After a discussion, which is not recorded in the minutes, it was decided to leave all responsibility regarding the translation of the English text to the Drafting Committee, with the following instructions: “The Committee, instead of seeking a literal translation, should attempt to reproduce the general sense of the English text, taking account, as far as it might be necessary, of the difference between the idiom of the two languages.” (Shotwell 1934b, p.225). The process led to the translation in the final text of “the provision of an adequate living wage” into “la garantie d’un salaire assurant des conditions d’existence convenables”.

With the exception of the Preamble, the first part of the report dealt exclusively with issues related to the establishment and the functioning of the organization. This was a deliberate choice of the British Delegation in preparing the draft that was presented to the Commission. Using Phelan’s words: “This draft dealt only with machinery, as it was the view of the British Delegation that the Peace Conference was not a suitable body for settling labor questions, and that they could not at any time be settled once for all.” (Phelan 1934a, p. 131). However, when it was agreed in the Commission to take the British proposal as the basis of the discussion, other delegations reserved the right to bring forward their own proposals. Several proposals contained suggestions for a “Labour Charter” to be included in the Peace Treaty and, when the Commission turned to these proposals after the work on the British scheme had been completed, the Italian Delegation made a formal proposal to insert in the Treaty “a chapter consisting of social clauses constituting a labor charter” (*ibid.*, p. 185). This view was supported by the President of the Commission, Mr. Gompers (President of the American Federation of Labor), and by Mr. Vandervelde, who pointed out that the Commission could not consider its work being terminated by the final approval of the British proposal, and that it ought to affirm certain principles. The Commission followed this approach and that is the purpose of the second part of the report.

The Commission did not work this time on the basis of an initial draft prepared by a delegation, it received various proposals from the delegations (see Shotwell 1934b). A subcommittee was appointed for the coordination of these proposals. It “had examined the proposals put forward by the different delegations, and had confined itself to putting them in the order of the support which they received” (Phelan 1934a., p. 186). It came up with a list of nineteen points, among which the issue of wages came fourth under two optional wording, as follows:

4. The principle that every worker has a right to a wage sufficient to maintain a reasonable standard of life, having regard to the circumstances of time and place.

Alternative: The principle that a reasonable wage should be paid for all work performed, based on a standard of life corresponding to the degree of civilisation attained at the period in question.

(*ibid.*, p. 187)

Nine out of the nineteen points, including point 4, were retained by the Commission. Phelan considers that: “It is not necessary to describe in detail the whole of the Commission’s consideration of the nineteen points. It was agreed that only those should be retained which received a vote of two thirds of the members of the Commission, and this decision achieved the result of limiting the number adopted and of securing that only those points having a large measure of general support would be proposed for insertion in the Treaty.” (*ibid.*, pp. 190-191). Apparently, there was no real discussion or controversy over point 4, and it was adopted with a

wording proposed by the British Delegation, under the heading of “The Principle of the Minimum Wage”:

Point 4. – The Principle of the Minimum Wage

Sir Malcolm Delevingne proposed it as drafted by the British Delegation. It was adopted with the following wording: –

“Every worker has a right to a wage adequate to maintain a reasonable standard of life, having regard to the civilisation of his time and country”.

(Shotwell 1934b, p. 306)

The report of the Commission, including the two parts, was presented at a Plenary Session of the Peace Conference. But before looking at the last debates which took place for the adoption of the final text, it is worth noting that, among the various proposals submitted to the Commission for “Labour Clauses” suggested for insertion in the Treaty, two are of particular interest for the issue of the living wage: *the Manifesto of the International Trade Union Conference at Berne, February 10, 1919, on International Labour Legislation*, and the clauses suggested by the British Delegation.

The Berne Manifesto was presented to the Commission by the French Foreign Office. It has been adopted practically in the same terms by the International Trade Union Conference and by the International Socialist Conference, in Berne in February 1919 (Shotwell 1934b, pp. 336-340). It demands the insertion in the Treaty of Peace of an “International Labour Charter” comprising 15 points. Among these, one is related to the minimum wage in the following terms:

10. In any case in which wages are insufficient to secure a normal standard of comfort and in which it is impossible to secure an agreement between workers and employers the Government shall set up joint commissions to establish minimum wages.

(Shotwell 1934b, p. 339)

The idea of securing a normal standard of comfort found somehow its way into the adopted text, but the proposal of setting up joint commissions to establish minimum wages when workers and employers fail to reach an agreement, was not retained by the Commission.

The British proposal comprised only five principles and included explicitly the principle of a living wage. Moreover, it provided a definition for it:

3. The principle of a living wage for all workers – that is, a wage sufficient to maintain, in the circumstances of each country, an adequate standard of life.

(*ibid.*, p. 349)

This formulation defining the living wage is very close to the wording adopted by the Commission for defining the principle of the minimum wage. It seems pretty safe to say that, in the minds of the delegations, the principle of a “living wage” and that of a “minimum wage” were equivalent.

By and large, the British Delegation was hostile to the idea of including a labour charter in the Treaty, but with regard to the dynamics within the Commission it felt that it had also to make its own proposal. It is interesting to see the explanation given by Phelan, who was a member of the British Delegation:

The Delegation still held that effective application of any kind of labor charter could only be achieved through the working of the International Labor Organization, in which employers and workers would be represented. It felt, however, that it could not completely oppose an attempt to give some satisfaction to the other delegations, in view of the consideration and support which its own scheme had received from them. It

therefore drew up *a list of points which was limited to those which had been generally accepted by the most advanced industrial countries, including Great Britain*², as an indication of the distance it was prepared to go to meet the desire so widely held by the other members of the Commission.

(Phelan 1934a, p. 190)

In other words, the British Delegation was considering that the principle of a living wage was among the principles generally accepted at the time by the most advanced industrial countries.

After the adoption of the report, several difficulties arose before it was presented at a plenary session of the Peace Conference. But there were no further meetings of the Commission, the negotiations on different points were carried out from delegation to delegation simultaneously, and, in the words of Phelan, “although the final results can easily be identified, the whole story of the bewildering cross-currents that almost wrecked the Commission’s achievement will probably never be told in any complete form” (Phelan 1934b, p. 199). Most of the problems were within the British Empire Delegation where there was in particular serious opposition by the Dominions (Canada, Australia, South Africa, New Zealand) to certain points of the “Labour Charter”. As the “Labour Charter” was not part of the original British scheme, its clauses had not been the subject of consultation with the Dominions. Apparently, the question of the minimum wage was not a specially contested issue. After a series of negotiations and consultations, Sir Robert Borden, from Canada, redrafted the clauses and the amended text received the unanimous approval of the Plenary of the Conference. The principle of the minimum wage became the third principle under a slightly different wording:

Third. – The payment to the employed of a wage adequate to maintain a reasonable standard of life as this is understood in their time and country.³

(Phelan 1934b, p. 217)

In presenting the amended text Sir Robert Borden made it clear that it was the result of a wide consultation: “The suggested changes in the phraseology and arrangements have come from the different Delegations which are represented in the Conference. They have received, I believe, the approval and endorsement of all the important industrial communities.” (ILO 1923a, p. 307). Mr. Vandervelde, from Belgium, approved the amended text and gave some explanations for the changes introduced: “As Sir Robert Borden has just said, a mere comparison of the two texts suffices to show that there is no essential difference between them. The text proposed by the Commission was more precise, and I may say that my personal preferences were for such precision. However, in the course of the exchange of views, which preceded this meeting, we have convinced ourselves that in order to secure unanimity between the representatives of the 32 nations, situated in every corner of the globe, a little scumbling, if I may use the phrase, was indispensable.” And he added: “We have, therefore, slightly scumbled the text, and I give my complete adhesion to the final text proposed by Sir Robert Borden. I do so all the more gladly because, as regards the questions to which European working-men are more especially attached, that is syndical liberty, a minimum wage, and the eight-hours day, the two texts are wellnigh identic.” (*ibid.*, p. 307). So he confirmed that the change in wording of the principle of the minimum wage implies no change in terms of substance, and he also identified the minimum wage as one of the three main priorities of the workers in Europe at the time.

After these explanations of the changes and the acceptance of them by Mr. Vandervelde, the amended text was unanimously adopted by the Plenary Session of the Peace Conference (Phelan 1934b, p. 218). Then, the text of the Convention providing for the establishment of the International Labour Organization and the Labour Clauses was revised to include the adopted

² Emphasis added.

³ The formulation in the French text does not differ here from the English version: “Le paiement aux travailleurs d’un salaire leur assurant un niveau de vie convenable tel qu’on le comprend dans leur temps et dans leur pays.”

amendments, and it was incorporated into the Peace Treaty as its Part XIII. It still constitutes the basis of the ILO Constitution, without the article 41, the Labour Charter, which was later “omitted” when, in 1946, the Declaration of Philadelphia was incorporated into the Constitution.

2. The Declaration of Philadelphia, 1944

The Declaration of Philadelphia was adopted by the International Labour Conference during its 26th Session in Philadelphia on 10 May 1944. It restates the aims and purposes of the International Labour Organization. The principle of a “living wage” is explicitly mentioned among the achievements of the programmes that the Organization has “the solemn obligation to further among the nations of the world” (part III of the Declaration). The formulation is as follows:

*(d) policies in regard to wages and earnings, hours of work and other conditions of work calculated to ensure a just share of the fruits of progress to all, and a minimum living wage to all employed and in need of such protection*⁴;

(ILO 1944b, p. 316)

The Conference worked on the basis of a report prepared by the Office (ILO 1944a). The proposed text of what became the Declaration of Philadelphia has been drafted by Edward Phelan, who had become the Acting Director of the ILO, and Wilfred Jenks, the Legal Adviser. The initial text regarding the clause mentioning the living wage is very similar to the final one adopted after discussion at the Conference:

The application of policies in regard to wages and earnings, hours and other conditions of work calculated to ensure a just share of the fruits of progress to all, and *the assurance of a minimum living wage to all in need of such protection*⁵.

(ILO 1944a, p. 14)

The brief explanations given in the report shed light on what was meant by the authors in this proposed clause. In particular:

The clause is not limited to wage earners, but includes salaried employees and independent workers.

[...]

No attempt is made to specify in the declaration any particular level of hours, as experience has shown that under present conditions of technological development any figure is likely to become rapidly out of date in the industries with the most modern technical equipment, while remaining an objective for future effort in industries which are technically less advanced. It therefore appears preferable to state the general principle that the worker is entitled to his just share of the fruits of progress rather than to endeavour to prescribe a limit of hours.

The clause applies the same principle to wages and earnings, and to other conditions of work, and recognises the need for a minimum living wage for those too weak to secure it for themselves by such methods as collective bargaining.

(ILO 1944a, p. 14)

The proposed text gave rise to a very lengthy discussion during six sittings at the Conference, from Monday 24 April to Wednesday 26 April, with 52 speakers (ILO 1944b, pp. 22-133). According to the proceedings, the principle of insuring to all a minimum living wage did not

⁴ Emphasis added.

⁵ *Ibid.*

raise many reactions during the discussions. It was addressed only in few occasions, among the numerous speakers.

First, Ms. Frances Perkins, government delegate of the United States, Secretary of Labor, United States Department of Labor, referred to it in her long introductory speech, which initiated the discussion and showed the great importance attached to this Declaration by the United States Government, including a special attention to the precise wording of the text. She addressed several times the issue of the minimum wage, but with no direct reference to the wording of the proposed text, more in programmatic terms of what should be done.

The improvement of the conditions of employment is, therefore, an essential concern. The International Labour Organization has a special and peculiar responsibility for developing these minimum standards and for establishing them in practice, minimum standards that all of us regard as necessary, but do not always practise, such as [...] provisions for minimum wages and maximum hours [...].

(ILO 1944b, p. 23)

[...] we believe that there should be further exploration of the possibility of setting specific minimum wages by international negotiation, for particular industries or particular regions. We believe that the I.L.O. in the past has not given adequate attention to the problem of securing minimum earnings for those groups who do not work for wages, but sell the product of their labour direct to the open market.

(*ibid.*, p. 23)

We believe that in every country there should be minimum-wage fixing machinery and current knowledge as to what wages are paid and what hours worked.

(*ibid.*, p. 24)

The employers' delegate from Mexico, Colonel Pedro A. Chapa, referred directly to the proposed text and suggested using the wording "minimum wage" in the following terms:

The principle of the third point of the proposed Declaration is to allow the workers access to the benefits of civilisation within the particular conditions of each State. As for wages, it would be better to maintain the use of the term "minimum wage", which has already become established in positive law and jurisprudence.

(*ibid.*, p. 38)

Dr. Guillermo Nannetti, government delegate from Columbia, referred to "living wages" as follows:

Work should not be a commodity. There should be guaranteed living wages.

(*ibid.*, p. 102)

Mr. Jamnadas Mehta, workers' delegate from India, supported the "solemn Declaration", which for him was not "merely a solemn Declaration, but one which entails very solemn obligations on all of us both in this hall and outside, upon all free nations, and upon the Members of this Organization, to see that we follow it up with actual results in our respective countries" and he noted in particular that in India "We have no minimum wages" (*ibid.*, pp. 80-81).

After the discussion ended, it was decided to refer the Declaration to a Drafting Committee with a view to an adoption by this session of the Conference. The Drafting Committee, chaired by the President of the Conference, Mr. Walter Nash, Envoy Extraordinary and Minister Plenipotentiary, Washington D.C., government delegate from New Zealand, had the mandate "to take into account all observations made during the general discussion in the full Conference on the Declaration. It will also be prepared to take into consideration any further observations which delegates may wish to make to it and will decide on the way in which such observations may be brought to its attention" (*ibid.*, p. 135).

The report of the Drafting Committee was presented by Mr. Nash at the fourteenth sitting of the Conference, on 10 May 1944. The Committee examined closely all the various observations and suggestions; and, finally, it introduced only little changes to the proposed text. In the words of its Chairman:

[It] has held three meetings, in the course of which it has taken into account all the observations made on the Declaration during the general discussion in plenary session, and the further observations drawn to its attention by delegates.

The Committee, after examining closely a number of proposals for rearranging the provisions of the proposed Declaration and simplifying the text, unanimously decided to propose to the Conference that the Declaration should be adopted substantially in the form in which it was referred by the Conference to the Drafting Committee.

(ibid., p. 187)

He also gave a precious insight into the approach of the Committee in its redrafting endeavour:

[...] it was guided in the revision of the wording of certain clauses by the desire to make the text acceptable to all elements in the Conference.

(ibid., p. 187)

Concerning the clause on the “minimum living wage”, a slightly different wording was introduced, which makes it clear that the guarantee of a “minimum living wage” does not apply to “all”, but to “all employed”:

(d) policies in regard to wages and earnings, hours and other conditions of work calculated to ensure a just share of the fruits of progress to all, and a minimum living wage to all employed and in need of such protection;

(ibid., p. 316)

Moreover, he made an important statement with regard to the link between this Declaration and the existing provisions of the Constitution of the Organization. He made it clear that the Declaration does not in any way overrule them or call them into question:

The Committee wishes to emphasise that the first part of the text, by reaffirming the fundamental principles on which the Organisation is based, underlines that the Declaration does not in any way subtract from the force of the provisions of the Constitution of the Organisation.

(ibid., p. 187)

The proposed Declaration was read and the report as submitted, comprising the revised text of the Declaration, was unanimously adopted by the Conference, on this sitting of 10 May 1944. It became the Declaration of Philadelphia, and was incorporated in the ILO Constitution in 1946⁶. At this occasion, some amendments were introduced into the text of the Constitution itself. In particular, a new principle, concerning wages, was added in the Preamble: the “recognition of the principle of equal remuneration for work of equal value”. Moreover, the importance of the principles set up in the Preamble was reinforced: attaining the objectives listed in the Preamble was stated as being the aim of the Constitution of the International Labour Organization. One sentence (underlined below) was included to this effect in the last paragraph of the Preamble, which in the amended text now reads:

The HIGH CONTRACTING PARTIES moved by sentiments of justice and humanity as well as by the desire to secure the permanent peace of the world, and with a view to attaining the objectives set forth in this Preamble, agree to the following Constitution of the International Labour Organization: [...].

(ILO 1948, p. 544)

⁶ In the French text, a “minimum living wage” is here a literal translation of English: un “salaire minimum vital”.

The Committee on constitutional questions proposed also, with the incorporation into the Constitution of the Declaration of Philadelphia, the “omission” of article 41, the “Labour Clauses” of the Treaty of Versailles (*ibid.*, p. 356).

Since then, the first paragraph of article 1 of the ILO Constitution reads:

1. A permanent organisation is hereby established for the promotion of the objects set forth in the Preamble to this Constitution and in the Declaration concerning the aims and purposes of the International Labour Organization adopted in Philadelphia on 10 May 1944 the text of which is annexed to this Constitution.

(*ibid.*, p. 546)

II. Implementation of the Principle in the First Decade

In the first decade of the ILO, the implementation of the principle of a living wage stated in the Treaty of Versailles can be summarized in the following way: from “an adequate living wage” to “a minimum wage-fixing machinery”.

The issue of the minimum wage came up very early after the establishment of the Organization and of the Office. Already at the first session of the International Labour Conference, in Washington D.C., in 29 October-29 November 1919, the issue was raised by the government delegate of Paraguay, Mr. Gondra, during the discussion over the hours of work convention, which became the first ILO convention. He pointed out the risk for the level of wages of the reduction of the hours of work and, consequently, the need for minimum wages:

[...] the delegation from Paraguay intends that incorporation of the American principle that human labor shall not be considered as merchandise shall include the principle, not only of limiting the working day, but also of the minimum wage in the various industries. The delegation from Paraguay announces, in this connection, that it is going to adopt the recommendation that this question be considered at the next conference. Now, I believe that it would be fair to prevent wages which have been obtained by the Italian workers, for instance, in Italy, in conformance with ordinary living conditions in this country, from being decreased, owing to the change in the length of the working day.

(League of Nations 1920, p. 130)

The delegation of Paraguay presented then a motion for the “establishment of a commission on minimum wages”, proposing the adoption of the following resolution:

Whereas the incorporation into the by-laws of this conference of the principle that human labor is not an article of commerce, implies the right of the State to enact the proper laws to enforce that principle so that human labor shall not be subject to the law of supply and demand, and in times of unemployment should not be subject to inadequate wages brought about by abundance of labor, therefore be it

Resolved, That the International Labor Conference in its first session recommends to the States, members thereof, the establishment of a special commission that may gather the necessary material to study and report to a future conference upon the possibility of the establishing of minimum wages in the different industries in accordance with the principle of the general declaration contained in article 427 of the treaty of Versailles, and be it further

Resolved, That the trades and processes with which this recommendation deals be the same as those contemplated by the convention on hours of work.

(*ibid.*, p. 271)

The proposal to establish a Commission on Minimum Wages was not retained by the Governing Body at its Second Session, held in Paris on January 1920 (ILO 1920b, p. 40). But the Office did extensive work on the minimum wage, and on wages in general, in the following years.

1. The Office work on the minimum wage

Following up on the motion of the delegation from Paraguay, the Director of the Office, Albert Thomas, asked for a note on the minimum wage. It was produced by a statistician freshly recruited by the Office, James Nixon. Dated the 18 May 1920, it was written in English and then translated in French for Albert Thomas; only the French version is now available (Nixon, 1920). This note is of great interest, as it shows the complexity of the issue and points to the main questions raised by the establishment of a living wage/minimum wage with which the ILO was

confronted in the following years and which have determined its work subsequently. Most of these questions are still widely relevant today.

First, Nixon lists the benefits and the disadvantages of a minimum wage established by an international agreement (pp. 1-4). Then, he considers that a minimum wage differs in essential ways from other minimums addressed in the Treaty:

In the first place, a minimum wage does not constitute, unlike the other minimums, one of the elements of a minimum standard of living, but only a means of attaining that minimum level, by providing the worker with a minimum income. The minimum wage itself provides a minimum income only if the continuity of the employment to which it relates is guaranteed. Moreover, the minimum wage, as is generally understood, is fixed without taking into account the family expenses of the employee and may therefore not provide an adequate minimum of family income.

The second dimension under which a minimum wage differs from the other minimum levels is that the standard of living, translated into a sum of money and commodities, differs to such an extent from one country to another that an international standard is almost, if not totally, impossible to fix.

Each State must therefore be able to determine its own standard and all that an International Conference could do is to lay down certain principles, according to which each State should proceed.⁷

(Nixon 1920, pp. 4-5)

He then lists some of the points that a special commission at the Conference would have to deal with (*ibid.*, pp. 5-8). Here is a summary of these points:

1. What is a living wage and on what basis should it be determined?
2. What minimum of welfare should be ensured?
3. Should we distinguish a minimum for men from the minimum for women? Should there be a special minimum for young people? Would married men be distinguished from single men?
4. The subsistence of how many people should the normal wage, i.e. the wage of a married man, be able to ensure?
5. Should there be: 1) a national minimum across the country, or 2) different minimums for different industries, or 3) a combination of 1) and 2)?
6. What special provisions should be made to apply the minimum wage to piecework?
7. Should the minimum wage, whether or not it is the same for all trades, differ according to localities?
8. How should the minimum wage take into account changes in the cost of living?
9. How can a minimum wage be set? Three methods have been tested in different countries: direct fixing by law, fixing by certain designated bodies (method generally adopted: "Trade Boards", "Wage Boards", joint arbitration or conciliation Boards, etc.), collective agreements made binding.

Nixon does also a review of existing legislation in various countries (pp. 9-14). It is worth mentioning here his comments regarding the experience of Australia and New Zealand, two pioneering countries in the field of minimum wages and who actually used the concept of a living wage in their legislation:

⁷ Our translation.

The results of the experiences in Australia and New Zealand were as follows:

1. insufficiently paid homework has been abolished;
2. there has been no significant unemployment resulting from the application of the minimum;
3. there is an undoubted tendency to undervalue or depreciate skilled work;
4. trade unionism was encouraged;
5. the "living wage" has been increasingly interpreted in such a way that it no longer represents only the minimum necessary for existence but a "normal" wage.⁸

(*ibid.*, p. 12)

Nixon concludes his note by saying that it would be inappropriate to establish a special commission on the issue at the Conference in 1921. He is very clear in his conclusion and in his recommendations for the way forward:

Inappropriate to set up a special committee at the 1921 conference to study the matter.

The above analysis is sufficient to show how complex the issue is. An in-depth review would require, first of all, an enormous documentation, and a commission would be less qualified to carry it out than the International Office itself.

The Office should therefore have carried out all necessary preparatory work before the Committee could begin its work.⁹

(*ibid.*, p. 15)

Subsequently, during its first decade, the Office worked extensively on wages statistics, especially in conjunction with a series of International Conferences of Labour Statisticians (ICLS). The initial Conference was held under the auspices of the ILO in Geneva in 1923. The objective was to discuss principles and methods from the point of view of international comparisons. The statistics of "wages and hours of labour" was one of the three subjects addressed at this first Conference (ILO 1923b and ILO 1924). This initial Conference was followed by four others in 1925, 1926, 1931 and 1932, covering the whole field of labour statistics. The fourth Conference, in 1931, dealt exclusively with the issue of "international real wage comparisons". In addition to these conferences convoked and organized by the ILO, the Office collaborated closely to three other international meetings, where it was invited to take part. One in Munich in 1928 on statistics of housing and two convened in 1929 and 1930 by the Social Science Research Council (USA) to study the question of statistics of wages (for a review of the work of the Office and of these international statistical conferences, see ILO, 1934).

The Office did also a survey on legislation regarding minimum wage in various countries. A series of articles were published in the *International Labour Review* describing the legislation and practice of the United States (May-June 1921), Great Britain (Aug. 1923), Canada (April 1924), Australia and New Zealand (Oct.-Dec. 1924), Norway (Dec.1925), and France (Aug. 1926). It also published an article on the minimum wages laws for the protection of workers in low-paid industries in various European countries (Nov. 1921) and one on general problems involved in fixing minimum wages (May 1925). In 1927, The *Review* published an article which outlines the general problem of fixing minimum wages and reviews the main features of the minimum wage systems of various countries (ILO 1927a). The article identifies notably in existing laws three different approaches or criteria for fixing minimum wages: "the living-wage principle", "the relation to wages of other groups of workers" and "the capacity of industry to pay". And it gives an interesting insight into the actual application of the principle of the living wage:

⁸ *Ibid.*

⁹ *Ibid.*

The living-wage principle had received its greatest application in Australia, New Zealand, the United States, and Canada. A frequent practice in the two former countries is for the minimum or basic wages of adult male workers to be fixed according to the requirements of a family of average size, while the basic wage for women workers is determined according to the requirements of a woman dependent solely on her wage but not contributing to the maintenance of others. In the United States and Canada, where, as already stated, the minimum wage laws have hitherto applied mainly to female workers or to female workers and male minors, the minimum wage is based, as in Australia and New Zealand, on the requirements of a woman without dependants.

Since the minimum requirements of a man with a family of given size or of a woman without dependants are approximately the same for workers of given grade in different trades in the same district, it follows that if the living-wage principle is applied there will be uniformity in the minimum rates fixed for the lowest grades of workers of different trades in any given area. The difficulty arises, however, that all trades are not equally prosperous. [...].

A further problem arises in connection with the living wage. The cost of living often differs from one locality to another, and therefore the same money wage implies a different real wage in different localities. [...] Another problem is the adaptation of money wages to changes in the cost of living from date to date.

(ILO 1927a, p. 678)

The article also points out the motivation, from an international perspective, for “stimulating the establishment in various countries of machinery for fixing minimum wages in badly organised low-paid trades”. The main concern relates to the comparative advantage of low wages in a context of international economic competition and free trade:

Already many industrial States have applied the principle of regulation to protect low-paid unorganised workers. The application of the principle in other States would appear desirable as a measure of protection to the workers in those States. Also such action would be in agreement with the idea expressed in the preamble of Part XIII of the Treaty of Peace, that “the failure of any nation to adopt humane conditions of labour is an obstacle in the way of other nations which desire to improve conditions in their own countries”. The obstacle would be removed to a greater or less extent by the adoption of a system of minimum wage regulation in all countries.

(*ibid.*, p. 671)

Parallel to the Office work, the Governing Body of the ILO considered on several occasions to place the question of minimum wages on the agenda of the International Labour Conference (the Conference). The proposal was rejected twice, at its 17th Session, in January-February 1923, and at its 25th Session in January 1925. Finally, the question was retained at its 30th Session in January 1926 and placed on the agenda of the Conference, at its 10th Session in 1927.

2. Minimum wages at the International Labour Conference, 1927 and 1928

The process towards the Conference

The proposal to place the question of minimum wages on the agenda of the Conference was put forward by the British Government delegate, Mr. Humbert Wolfe. It was first presented and discussed at the 29th Session of the Governing Body, in October 1925 (ILO 1925, pp. 44-45). The question was phrased as follows:

Minimum wage fixing machinery in trades where the organisation of the workers and the employers is not sufficiently developed to provide the regulation of wages by collective agreement, and where, in the absence of that regulation, the wages are exceptionally low.

(*ibid.*, p. 44)

In presenting its proposal to the Governing Body, the British Government delegate explained its rationale and underlined its limited scope:

Mr. Wolfe pointed out that the proposal did not imply the fixing of minimum wage, but an examination of the methods by which wage rates could be fixed in certain industries. This question was without doubt more important, more urgent and more critical than that of holidays with pay [*other proposed question to be placed on the agenda of the Conference*], important as that might be. The Governing Body could not fail to concern itself with those workers who were suffering privation owing to exceptionally low wages, and it was for those countries with advanced social legislation to help the less advanced countries by indicating the methods of fixing wages in those special cases. The Office should devote its attention to the position of workers in sweated industries.

(*ibid.*, p. 44)

The Governing Body decided to place provisionally the proposed question on the agenda of the 1927 Conference, for a final decision to be taken at its next session, and it asked the Office to prepare a note defining the exact scope of the question. Following the discussion at the Governing Body and taking into account the criticisms expressed, Mr. Wolfe sent to the Deputy-Director of the Office, Harold Butler, a memorandum to clarify the British Government proposal (Wolfe 1925). He identified two different kinds of criticism that had been made by members of the Governing Body against the initial proposal: 1) it was pointed out that “it was difficult to understand the exact scope of the subject without some specific reference to home-working trades”; 2) it was pointed out that, “unless Governments were allowed considerable freedom of action and discretion and unless the convention was very widely drawn, in some cases the effect of such a convention would be to impose universal wage regulation” (*ibid.*, p. 1). To remove the concerns regarding these two points, he proposed a new drafting of the question:

“Wage-fixing machinery in unorganised and underpaid trades, having special regard to home-working trades.”

He considers that the new wording clarifies the intention and the scope of the proposal:

“These words make three main points perfectly clear:

- (a) That there is no intention to suggest that wages should be fixed by the convention itself, but merely that wage-fixing machinery in the various States should be examined. [...].
- (b) That the scope of the convention should be clearly limited to the trades in any country which were the worst in that country. [...].
- (c) That the kind of trades that the subject envisages are home-working trades and trades of that character, i.e. the trades which as a rule do not form the staple trades of any country.”

Moreover, he emphasized that it was not at all an ambitious proposal and considered that the International Labour Organization should, at one point, seriously address the wage problem:

“It will be clear, therefore, that the proposal is a modest one and starts by dealing at the least complicated point with the wage problem, which, after all, is a problem which the International Labour Organization must at some time or another attack.”

(*ibid.*, pp. 1-2)

At its 30th Session in January 1926, the Governing Body considered again the proposal of the British Government delegate on the basis of the note prepared by the Office, note which included the new wording proposed by Mr. Wolfe (ILO 1926, pp. 108-110). It finally decided

to place the issue on the agenda of the 1927 Conference and with the question formulated as follows¹⁰:

Minimum wage-fixing machinery in trades in which organisation of employers and workers is defective, and where wages are exceptionally low, with special reference to the home working trades.

(*ibid.*, p. 37)

The first discussion at the Conference, 1927

The Conference benefited from an extensive preparatory work of the Office. In view of the discussion, the Office published an international review of legislation and practice on “minimum wage-fixing machinery” (ILO 1927b) and produced a report to serve as a basis for the first stage of the discussion¹¹, report that included an overview of the different aspects of the issue, suggestions regarding a draft convention and a draft recommendation and a proposed draft questionnaire to be sent to governments (ILO 1927c). There are several points related to the application of the principle of a living wage in these reports that are worth quoting. The case of Australia, for example, is especially interesting:

The basis on which wages are generally regulated in Australia is the living wage although this is defined in varying terms and is subject to reservations which differ from one State to another. In the development of the application of the living wage principle the Commonwealth Court has exercised an important influence. In making awards, the president of the Court has indicated the principles on which the decisions of the Court have been reached. These include the right of every employee in any industry to a living wage. The living wage is based on the general standard of the community and the economic conditions of an industry are not taken into consideration except perhaps to allow for a temporary depression. For adult male workers the living wage is defined as a wage adequate in a civilised community for a man with wife and three children. For women workers it is based on the requirements of a woman without dependants; where, however, women compete with men in any occupation, the men’s wage is generally prescribed.

(ILO 1927b, p. 122)

The report for the Conference reviews the main different bases identified for fixing minimum wages: the living wage basis; the capacity of industry to pay; the relation to other groups of workers (ILO 1927c, pp. 27-41). It notes that:

It would appear at first sight that these different bases are irreconcilable. However, a close relation exists between them. This is especially true of the living wage basis and that of the capacity of the industry to pay. As a basis for wage fixing it would be meaningless to make an estimate of a living wage beyond the capacity of industry to pay. Here capacity of industry as a whole, and not of each separate industry or branch, is to be understood.

(ILO 1927c, p. 28)

On the living wage basis, the report draws extensively on the example of Australia, especially on the provisions of the New South Wales law:

In that State the Industrial Commission is required, after public inquiry, to declare from time to time what shall be the living wages to be paid to adult male employees and to adult female employees in the State. For adult male workers the living wage must be based on the requirements of a man with wife and two children under 14 years of age.

¹⁰ For the discussion, see ILO 1926, pp. 5-17 and pp. 35-37.

¹¹ For the first time the Conference in 1927 introduced a double discussion procedure, with a preliminary discussion leading notably to the adoption of a questionnaire to be sent to governments, and a second discussion for the possible adoption of a convention and/or a recommendation. Subsequently, the principle of a double discussion was kept, but with the questionnaire to be already sent to governments before the first discussion.

For adult female workers the wage is to be based on the requirements of a woman without dependants.

From the above definition a number of problems emerge. What are the requirements of a man with wife and two children, and of a woman without dependants? Do these requirements vary according to industry, district, and period of time? What course is the wage-fixing body to follow in the case of an industry or establishment unable to pay the wage considered necessary to meet these requirements? Is a special rate to be fixed for workers who are handicapped owing to physical or mental defect? Is allowance to be made for the fact that some male workers have fewer dependants than a wife and two children, while other have more? What provision is to be made for women with dependants? Is the relation between the wages of men and women, to which such a basis would lead, satisfactory?

(*ibid.*, p. 29)

These questions, “some of them highly controversial”, are examined in the following pages of the section, “in the light of experience applying the living wage principle” (see *ibid.*, pp. 29-35). One particular point is worth highlighting here, the introduction of family allowances to deal with the issue of different family sizes:

Whatever basis be adopted, the difficulty arises that, if wages are fixed at a flat rate for all workers of a given grade, workers who have few or no dependants will be better able to meet their needs than those with large families. If the wage is adequate for a family of five, those with smaller families will be able to enjoy a higher standard of living while those with larger families will suffer privation.

To meet this difficulty family allowance or family endowment system has been proposed. By this system the family income of the worker with dependants would include the wage of the worker and additional sums in respect of some or all of his dependants.

(*ibid.*, p. 33)

The proposal of the Office was to adopt three instruments:

A general Convention “dealing with the creation of minimum wage-fixing machinery for trades in which organisations of employers and workers is defective and where wages are exceptionally low, but leaving each Government free to decide for which precise trades the machinery in question should operate. This Convention would also provide for the annual communication to the International Labour Office of the results of the application of the wage-fixing machinery, the trades to which it was applied, the rates of wages fixed, the number of workers affected, etc.”

A Recommendation concerning homework trades “urging Governments to apply the wage-fixing machinery provided in the above Convention to all homework trades and recommending Governments to supply annually information concerning its application in this field.”

A general Recommendation “giving:

- (a) criteria for determining the trades in which the organisations of employers and workers is defective and where wages are exceptionally low;
- (b) bases which could be used for determining what the minimum rates of wages are to be;
- (c) various types of machinery and methods of inspection and enforcement of regulations.”

(ILO 1927c, p. 144)

The draft questionnaire was framed in three sections, in accordance with this suggestion. The question 2 of section III on the general Recommendation, related to the base for fixing minimum wages, was as follows:

2. Do you consider that a Recommendation should contain a provision indicating the basis which the minimum wage-fixing body or bodies should adopt when determining minimum rates of wages?

If so, what basis (living wage, capacity of industry, relation to wages of other categories of workers, or other) do you suggest?

(*ibid.*, p. 146)

At the Conference, the question was dealt by the Committee on minimum wage-fixing machinery, chaired by Mr. Wolfe (for the report of the Committee, see League of Nations 1927, pp. 661-670; for the proceedings of the discussion of the report at the Plenary, pp. 389-403, 406-409 and 419-432). The Committee chose first to suppress the framing in three sections and to adopt a single text. Then it was decided that “the questionnaire should deal both with home-working trades and other industries” (*ibid.*, p. 663). Several amendments to the Office text were then introduced question by question. The one concerning question 2 of section III in the initial questionnaire, which became question 5 in the questionnaire drafted by the Committee, is of particular interest here. It was decided to remove references to possible basis for fixing minimum wages:

Question 5

In this question again several passages in the Office questionnaire are summarized. It is proposed to ask the Governments if they consider that some provision should be made for a basis for fixing minimum wages and to indicate the basis they suggest. At the same time the question refrains from making suggestions as to the choice of a basis.

(*ibid.*, p. 666)

The revised text drafted by the Committee and adopted by the Conference reads as follows:

5. Do you consider that some provision should be made for a basis for fixing minimum wages? If so, what basis do you suggest?

(*ibid.*, p. 668)

The living wage, stated as a principle in the Peace Treaty, subsequently perceived as one of the basis for fixing minimum wages, was thus removed at this stage from the preparation process of the first ILO instrument on minimum wages.

The second discussion at the Conference, 1928

For the second discussion at the Conference in 1928, the Office prepared a report comprising three parts: the replies of the Governments to the questionnaire (coming from 22 countries); a general survey of the question in light of the replies of the Governments; and the texts of a proposed draft convention and a proposed recommendation (ILO 1928). On question 5, concerning the basis for fixing minimum wages, the report notes that “there can be no question of endeavouring to formulate a uniform international minimum of real wages. And it seems equally impossible to formulate any single and definite principle for determining minimum wages which would at once be satisfactory from the point of view of the protection of the workers and such that the different countries could be expected to accept it [...]” (*ibid.*, p. 106). Still, the report considers that the “living requirements of the workers” should be taken into account in the Recommendation:

The frequent references which are made in the replies of the Governments, however, to the necessity in any case of taking account of the living requirements of the workers (e.g. living wage, cost of living in the locality, minimum family budget, suitable standard of living, prevailing standard of wages and living, the fixing of wages in accordance with fluctuations of the cost of living, etc.) would appear to furnish one or two general principles which might be indicated in the Recommendation.

(*ibid.*, p. 107)

In its proposed text for the Recommendation, the Office did not retain the principle of a living wage for fixing minimum wages, but suggested two other possible principles: the referring to the rates of wages in trades with effective collective agreements or to the prevailing wages in the country or locality. Still, it puts the Recommendation in the context of the principle of an adequate living wage stated in the Peace Treaty:

In view of the replies, it would appear that the different countries might well be recommended to take these general principles into account: they are, in effect, an elaboration for the special purposes of the minimum wage fixing machinery of the adequate living wage principle formulated in the Preamble and Article 427 of Part XIII of the Treaty. It is accordingly proposed to include in the *Recommendation* the principle that *for the purpose of determining the minimum rates of wages to be fixed account should in any case be taken of the necessity of enabling the workers to maintain a suitable standard of living, and that for this purpose regard should primarily be had to the rates of wages paid for similar work in trades where the workers are adequately organised and have concluded effective collective agreements or, if no such standard of reference is available in the circumstances, to the general level of wages prevailing in the country or the particular locality.*

(*ibid.* p. 108)

At the Conference in 1928, the question was dealt again by the Committee on the minimum wage fixing machinery, chaired this time by Mr. Gascon y Marin, Spanish Government delegate (for the report of the Committee, see League of Nations 1928, pp. 626-652; for the proceedings of the discussion of the report at the Plenary, pp. 378-386, 389-414, 417-439 and 441-446). The Committee worked on the basis of the proposed draft convention and of the draft recommendation prepared by the Office. In the discussions as they are reported, the paragraph of the recommendation dealing with fixing the minimum rates of wages did not raise major problems; even if we refer to the minority report submitted by the majority of the Employers' Group¹² (*ibid.*, pp. 650-651). The text proposed by the Office was kept as initially drafted and became the first paragraph of Part III of the recommendation, as follows:

For the purpose of determining the minimum rates of wages to be fixed, the wage-fixing body should in any case take account of the necessity of enabling the workers concerned to maintain a suitable standard of living. For this purpose regard should primarily be had to the rates of wages being paid for similar work in trades where the workers are adequately organised and have concluded effective collective agreements, or, if no such standard of reference is available in the circumstances, to the general level of wages prevailing in the country or in the particular locality.

At the Plenary, the German Employers delegate, Mr. Gärtner, had proposed to add at the end of the paragraph the following words: "taking also into consideration the special situation of the industry with regard to the condition of supply, production and competition". The amendment was rejected by 52 votes to 27 (*ibid.*, p. 445).

The draft convention and recommendation were finally adopted by the Conference on 16 June 1928, respectively by 76 votes for, 21 against, and 81 votes for, 18 against (*ibid.*, p. 482 and p. 484). They became Convention No. 26 and Recommendation No. 30 on Minimum Wage-Fixing Machinery.

*

Convention No. 26 met a great success among ILO member States. In the following years after its adoption, it became one of the most ratified ILO conventions (Marinakakis 2008, p. 14). By

¹² The minority report of the Employers' Group was essentially motivated by the unsuccessful proposals of the Employers' Group to have the Committees' decisions restricted to home working trades.

and large, during its first decade, the ILO had worked extensively on minimum wages and, more generally, on wages (for an overview of the work done, see ILO 1931, pp. 161-174). However, Albert Thomas, the first Director of the Office, addressing the International Labour Conference in 1931, made a quite modest assessment of what has been achieved and stressed the need for new and broader work:

On the question of wages, it must be confessed that during the last ten years our Organisation has accomplished very little. In these ten years the problem has not been dealt with as broadly or as courageously as it should. We have collected statistics. They have been criticised. Mr. Vogel and the other German employers have not minced their words. Yet the technical experts encourage us to go on. The last Conference of Labour Statisticians said how useful and valuable this work was. But statistics are not enough: what is needed is to define a possible wages policy for the Organization. In other words, what is the practical significance of the definition given in the Treaty of Peace – an adequate living wage.

(Thomas 1948, pp. 91-92)

Subsequently, in 1939, the Office published a new comprehensive international survey of minimum wage legislation and practice (ILO 1939). The report provided in particular interesting examples of the practical complexity of applying the principle of the living wage, especially in the case of Australia (pp. 6-49) and New Zealand (pp. 151-177). Moreover, as Convention No. 26 and Recommendation No. 30 were only covering “manufacture and commerce”, the ILO embarked on a process of preparing new instruments covering agriculture. The process was undertaken under the same principles as for the previous instruments. It started in 1938, was interrupted by the war, and ended in 1951 with the adoption of Convention No. 99 and Recommendation No. 89 on Minimum Wage-Fixing Machinery in Agriculture (for a detailed review of the process, see Marinakis 2008, pp. 11-14).

In the 1960s, almost 40 years after the adoption of the first convention and recommendation on minimum wage, the ILO took a fresh approach to the issue.

III. Implementation of the Principle in the 1960s

1. A resolution on minimum living standards, 1964

The issue of minimum wages came back on the agenda of the ILO in the 1960s, in the context of the post-World War II decolonization and the corresponding growth of the membership of the Organization. It was re-introduced at the International Labour Conference in 1964 through a resolution submitted by the Mexican Workers' delegate, Mr. Sánchez Madariaga, and the Canadian Workers' delegate, Mr. Morris. After it has been discussed and slightly modified in the Resolutions Committee, the "Resolution concerning Minimum Living Standards and Their Adjustment to the Level of Economic Growth" was adopted by the Conference (for the text of the resolution, see ILO 1965, pp. 613-614; for the initial text, pp. 589-590; for the report of the Resolutions Committee, pp. 606-608; for the proceedings of the discussion of the report at the Plenary, pp. 518-520). Recommending the resolution to the Conference, Mr. Morris puts it explicitly in the context of the Declaration of Philadelphia and of the guarantee of a minimum living wage:

The Declaration of Philadelphia states that it is a "solemn obligation of the International Labour Organisation to further among the nations of the world programmes which will achieve ... policies in regard to wages and earnings, hours and other conditions of work calculated to ensure a just share of the fruits of progress to all, and a minimum living wage to all employed and in need of such protection". In submitting this resolution we were guided by these provisions of the Declaration of Philadelphia.

We feel that the effort of the I.L.O. in the field of incomes policies should be devoted to raising the wage of the lowest-paid workers in industrialised as well as developing countries to a minimum wage standard.

(*ibid.*, pp. 518-519)

He introduced a new and important dimension to the living wage, which was previously in germ with family allowances, namely social security as a factor determining living standards, together with wages; and he suggested that there should be for both of them periodical adjustments:

[...] the resolution calls for the establishment of dynamic minimum wage levels and dynamic levels of social security measures; and we suggest that both levels should be periodically adjusted to the economic growth of the country and to increases of the cost of living.

(*ibid.*, p. 519)

The resolution included also a series of studies to be undertaken by the Office and the proposal of revising Convention No. 26 and Recommendation No. 30, taking into account the principles enunciated in the resolution.

By and large, the resolution was well received when discussed in the Resolutions Committee:

The general ideas underlying the resolution were very sympathetically received by a large majority of the Committee, although certain observations were expressed by the Employers' and some Government members.

(*ibid.*, p. 606)

There were two major points of contention. The first concerned the link to establish between the improvements in the living standards of workers and the economic potential of the country. This was taken care of by inserting a new formulation in the fourth paragraph of the preamble, which "underlined the interdependence of economic development and improvements in minimum living standards" (*ibid.*, p. 606). The second point of contention related to periodical adjustments. The initial proposal considered that levels of wage and of social security measures

should be adjusted periodically “to the economic growth of a country and to increases in the cost of living” (*ibid.* p. 589). By a majority vote the Committee decided to introduce into the text a slight distinction between economic growth, which had to be taken “fully into account”, and an increase in the cost of living, which had to be “duly taken into consideration” (*ibid.*, p. 606). The final paragraph reads as follows:

The General Conference of the International Labour Organisation, [...]:

2. Emphasises that adequate minimum standards of living should be ensured through the establishment of a dynamic minimum wage level and a dynamic level of social security measures adjusted periodically to take full account of economic growth and to have due regard to increases in the cost of living.

(*ibid.*, p. 813)

The resolution invites also the Governing Body of the ILO to request the Director General:

(1) to undertake a study dealing with the interdependence of minimum standards of living and economic growth, [follows a detailed description of the studies to be undertaken];

(2) to work out proposals for a revision of the Minimum Wage-Fixing Machinery Convention, 1928 (No. 26) and Recommendation, 1928 (No. 30), taking into account the principles enunciated in this resolution.

(*ibid.*, p. 814)

The resolution was adopted by the Conference by 176 votes in favour, 1 against, with 17 abstentions (*ibid.*, p. 529).

As a follow-up to the resolution, the Governing Body, at its Session of February-March 1967, approved the proposal of the Office to convene a “Meeting of Experts on Minimum Wage-Fixing and Related Problems, with Special Reference to Developing Countries”, with the following agenda:

- (a) problems of minimum wage-fixing and related problems, with special reference to developing countries; and
- (b) ways in which the I.L.O. Minimum Wage-Fixing Machinery Conventions and Recommendations might be revised if revision is considered desirable.

(ILO 1967a, p. 2)

2. A meeting of experts, 1967

The meeting took place in Geneva from 25 September to 6 October 1967 and produced a report covering the two questions defined by the Governing Body (ILO 1967b). Some points of the report deserve to be highlighted here. Notably with regard to criteria for minimum wage fixing; it identifies three broad classes traditionally used: “(a) the workers’ needs; (b) the employers’ capacity to pay; (c) wages or incomes elsewhere in the economy”. And adds that: “Recent discussions have emphasised the importance of a fourth criterion, namely: (d) the requirements of economic development” (p. 10).

It should be noted that, to define the criteria, the report does not use the notion of “a living wage”, but that of “workers’ needs”. And in introducing the questions related to this criterion, it states that:

If a minimum wage is to have any significance it must be related in some way to the needs of workers. We must never overlook the fact that when we are dealing with wages we are not dealing with an economic abstraction but with the source of livelihood of millions of people.

(*ibid.*, p. 10)

The report lists then a series of points related to the criterion “the needs of the workers”, especially relevant to quote here:

1. “The difficulty lies in specifying these needs precisely.”
2. “How much income a wage earner requires depends also on the size of his family”, “a wage is in no sense a living wage unless it adequately covers all who have to live with it.”
3. There is a basic dilemma: “If the concept of human needs is interpreted very broadly in a poor economy, it will lead to the setting of wages at a level which throws out of work many of those who are in greatest economic need. On the other hand, if it is interpreted too narrowly, it will have little effect on actual wages, and may indeed be taken as an excuse for paying wages that are quite unreasonably low.”
4. “A distinction is implied between a “subsistence” standard which covers the barest needs of workers, and which could be the basis of a national minimum wage, and, on the other hand, a somewhat higher standard which should take greater account of social needs, and which could be seen as a future target for the whole population, or as a yardstick for setting the wages now of, e.g. those with some degree of skill.”
5. The analysis implies that “human needs have to be interpreted relatively, i.e. in relation with the economic level of the country concerned. Yet an objective minimum standard is necessary for each country, cast in physical terms as far as possible (e.g. so many pounds of rice, etc.). This standard should be such as to end conditions of labour which in the circumstances of that country would be considered “sweated labour”, at the lowest cost in terms of swelling the mass of unemployment.”

(ibid., pp. 10-11)

However, the report considers that the new and fourth criterion it introduces, “economic development”, should be, in the last resort, decisive:

Although an objective standard based on the human needs of workers should be established as a guide for wage-fixing authorities, the conditions in the country concerned, and its development needs and possibilities, must in the last resort determine the choice of standard and its exact definition.

(ibid., p. 14)

On the second question, concerning the possible revision of the conventions and recommendations, the report concludes on the desirability of drawing up new instruments. Moreover, it provides the concept of the minimum wage which could serve in the process; it comprises the three main following ideas:

- (a) the minimum wage is the wage considered sufficient to satisfy the vital necessities of food, clothing, housing, education and recreation of the worker, taking into account the economic and cultural development of each country. In some cases the needs of the family are also taken into account in the same manner as those of the worker, and in other cases they are covered by family allowances and other measures of social security;
- (b) the minimum wage represents the lowest level of remuneration permitted, in law or fact, whatever the method of remuneration or the qualification of the worker;
- (c) the minimum wage is the wage which in each country has the force of law and which is enforceable under threat of penal or other appropriate sanctions. Minimum wages fixed by collective agreements made binding by public authorities are included in this definition.

And with the following clause:

When examining the concept of minimum wage, mention must be made of the national minimum wage conceived as a level of basic general remuneration applicable to all in a given country, subject to adaptation to the economic and social conditions existing in the various areas or regions.

(*ibid.*, p. 21)

Concerning the nature of the instruments, the report favours “the adoption of a new Convention supplemented by a Recommendation, instruments which would not affect Convention Nos. 26 and 99 and Recommendations Nos. 30 and 89” (*ibid.*, p. 26).

In addition to the report of the meeting of experts was appended a law and practice report (ILO 1967c). The example of India on wage-fixing criteria is worth quoting:

In India [...] the Minimum Wage Act does not give any guidance regarding the principles or basis on which minimum wages are to be fixed. The factors generally considered by the industrial courts in determining minimum wages when industrial disputes are referred to them are the minimum needs of workers and their families, prevailing wage rates in comparable concerns, the fringe benefits payable to the workers, the nature of the work done, the productivity of labour, the level of managerial and technical efficiency, and the capacity of industry to pay. A formula for estimating minimum needs was provided in a resolution unanimously adopted by the tripartite Indian Labour Conference in 1957. This includes the cost of an adequate diet, 18 yards of cloth by person per year, rent for housing on a scale laid down in a government industrial housing scheme, and an allowance (20 per cent. of the total) for fuel, lighting and other miscellaneous items of expenditure. The resolution provided that “wherever the minimum wage fixed was below the norm recommended ... it would be incumbent on the authorities concerned to justify the circumstances which prevented them from adherence to the aforesaid norm”.

(*ibid.*, p. 20)

The Governing Body discussed the report and its annex at its Session of November 1967 (ILO 1967d, pp. 30-33) and, in the same Session, decided to put the item “Minimum wage-fixing machinery and related problems, with special reference to developing countries” on the agenda of the 1969 Session of the International Labour Conference, for examination under the double-discussion procedure.

3. Minimum wages at the International Labour Conference, 1969 and 1970

The Office prepared two reports for the first discussion at the Conference in 1969. A preliminary report to serve as a basis for the discussion, which provides a summary of the background, a description of law and practice in a representative number of countries, the text of the four existing instruments, an extract from the report of the meeting of experts and a questionnaire sent to governments (ILO 1968). The second report comprises the replies to the questionnaire of the governments of 79 member States, comments on the replies and the proposed text of a Convention supplemented by a Recommendation (ILO 1969a).

The question was discussed at the Conference in the Committee on Minimum Wage (for the report of the Committee, see ILO 1970, pp. 678-687; for the proceedings of the discussion of the report at the Plenary, pp. 467-473). Considering, in particular, the marked change in world economic and social conditions, in industrialized as well as developing countries, since the adoption in 1928 of the first instruments on minimum wage fixing, the Committee was in favour of drafting new instruments. Its proposal was to have a Convention and a supplementary Recommendation, “which would suggest guidelines for the implementation of the obligations embodied in the proposed Convention” (*ibid.*, p. 680) and that will cover “all groups of wage earners whose terms of employment are such that coverage would be appropriate” (*ibid.*, p. 685).

The Committee worked on the basis of the text proposed by the Office for the two instruments (ILO 1969a, pp. 119-123). Altogether, the Committee held 14 sittings and set up a Working Party to complement its work, as reported to the Conference by its Reporter, Mr. Okogwu, Nigerian Government delegate:

Having constantly before it, in particular, the needs and problems of developing countries, the Committee examined the subject from practically every possible angle. Consideration of economic and social development, the cost of living, the standards of living of other social groups, the level of employment, unemployment and underemployment, the capacity of employers in general to pay, the balance of payments and the rate of increase in productivity were not ignored. Discussions, quite often protracted, were frank, objective and incisive.

As guidelines on the subject of minimum wage fixing, the proposals for both instruments break new ground and would meet a long-felt need. This is particularly evident in the Recommendation which includes, *inter alia*, criteria for determining the level of minimum wages; criteria for the adjustment of minimum wages; and measures to ensure the effective application of all provisions relating to minimum wages.

(ILO 1970, pp. 467-468)

In the text proposed by the Committee and approved by the Conference, the issue of the criteria for determining the level of minimum wages is dealt with in both the proposed Convention and the proposed supplementary Recommendation.

The proposed Convention strikes a balance between the needs of workers and their families, and economic considerations, in the following way:

6. In determining the level of minimum wages, regard should be had, *inter alia*, to –
 - (a) the needs of workers and their families, taking into account the level of wages in the country, together with social security benefits, and the relative living standards of all other social groups;
 - (b) economic considerations, including the attainment and maintenance of a high level of employment.

(*ibid.*, p. 685)

The proposed Recommendation supplements these two clauses with the following guidelines:

B. Criteria for Determining the Level of Minimum Wages

14. Minimum wages should be fixed at a level that takes proper account of the basic needs of workers and their families, having regard to the general level of wages in the country, to the cost of living and changes therein and to the relative living standards of all other social groups.

15. Among the economic considerations referred to in Point 6. Attention should be given to plans for economic development, the level of employment, the capacity of employers in general to pay, the balance of payments and the rate of increase in productivity.

(*ibid.*, p. 686)

As a basis for the second discussion at the Conference in 1970, the Office prepared a report which, first, recalls the general discussion at the previous session of the Conference and presents the recommendations of the Committee on Minimum Wage, and, second, contains the proposed texts of a Convention and a Recommendation, which basically reproduce, with minor changes and the regrouping of some points, the proposals approved at the previous Session of the Conference (ILO 1969b). At this Session, the Committee on Minimum Wages was able to conclude its work and the drafting of a proposed Convention and Recommendation in eight sittings (ILO 1971, pp. 440-446; for the final text of the Convention, pp. 696-700, and of the

Recommendation, pp. 710-714). One of the major points of contention concerned in fact the criteria for determining the level of minimum wages and the issue regarding the needs of workers; as formulated by the Reporter of the Committee at the Plenary:

The third major point [of contention] concerned the criteria for determining the level of minimum wages. Here it was suggested that the proposed Convention should refer to the “basic” needs of the workers, and not simply to the “needs of the workers”; that it was adequate if only the needs of the workers were mentioned and not also the needs of their families; and, finally, that some additional criteria should be mentioned in the proposed Convention with at the same time the relevant Article 3 [point 6 in the previous text quoted above] being made more flexible, so that the criteria cited therein, as well as any others, might be taken into account only so far as possible and appropriate in relation to national practice and conditions.

After considerable discussion on these points, the Committee decided that it was desirable to retain the reference to the “needs of the workers and their families”, whilst also agreeing to include additional criteria in this Article, such as the requirements of economic development and the cost of living. The Committee decided to allow countries some flexibility in the choice of these criteria, depending on national practice and conditions.

(*ibid.*, pp. 440-441)

This solution did not satisfy the employers’ delegates, who would have strongly preferred “basic needs” rather than the concept of “needs” and wanted to delete the reference to “and their families” (*ibid.*, p. 443). At the end, the majority of the employers voted against the Convention and abstained on the Recommendation.

The final wording on the criteria for determining the level of minimum wages adopted by the Committee reads as follows:

For the Convention:

Article 3

The elements to be taken into consideration in determining the level of minimum wages shall, so far as possible and appropriate in relation to national practice and conditions, include –

- (a) the needs of workers and their families, taking into account the general level of wages in the country, the cost of living, social security benefits, and the relative living standards of other social groups;
- (b) economic factors, including the requirements of economic development, levels of productivity and the desirability of attaining and maintaining a high level of employment.

(*ibid.*, p. 698)

For the Recommendation:

II. Criteria for Determining the Level of Minimum Wages

3. In determining the level of minimum wages, account should be taken of the following criteria, amongst others:

- (a) the needs of workers and their families;
- (b) the general level of wages in the country;
- (c) the cost of living and changes therein;

-
- (d) social security benefits;
 - (e) the relative living standards of other social groups;
 - (f) economic factors, including the requirements of economic development, levels of productivity and the desirability of attaining and maintaining a high level of employment.

(ibid., p. 710)

The text of the Convention proposed by the Committee was adopted by the Plenary of the Conference by 246 votes in favour, 48 against and with 26 abstentions; and that of the Recommendation by 228 votes in favour, 3 against, with 55 abstentions. Both texts were then transmitted to the Drafting Committee of the Conference for the preparation of the final texts. The Convention and the Recommendation were finally adopted by the Conference on 22 June 1970 by, respectively, 248 votes in favour, 46 against, with 46 abstentions for the Convention, and, for the Recommendation, 251 votes in favour, 5 against, with 74 abstentions (*ibid.*, pp. 599-600; and for the detailed results of the votes, pp. 603-606). They became Convention 131 – Convention concerning Minimum Wage Fixing, with Special Reference to Developing Countries, and Recommendation 135 – Recommendation concerning Minimum Wage Fixing, with Special Reference to Developing Countries.

Since then, and as the International Labour Organization is heading towards its centenary, these two International Labour Standards constitute the ILO instruments which implement the principle of a living wage as a criterion for determining the level of minimum wages, under the notion of “the needs of workers and their families”.

Conclusion

The historical perspective on the ILO and the living wage provides a good, almost paradigmatic, illustration of the functioning of the Organization and of the production of international labour legislation. It shows how a principle is stated at historical moments, in the Peace Treaty of WWI in 1919 and towards the end of WWII in 1944, and how it is afterwards translated into international legal instruments. Looking at the whole process gives a special insight into the role of the various actors involved and the interplay between the three components of the Organization: the Office, the Governing Body and the Conference; in other words, the secretariat, the executive body and the legislation body, the key institution, composed of four representatives of each of the Members, with two delegates representing the government and two others representing respectively the employers and the workers.

Wages are an especially important issue for the ILO since its origin. They are essential for workers as the source of their livelihood and, at the same time, low wages are used in some countries as a comparative advantage in international trade. The tension between these two dimensions is closely linked to the very reason for establishing the Organization in 1919: to avoid social unrest that could imperil “the peace and harmony of the world” in improving labour conditions, in the context of international economic competition and free trade. With the experience of the pre-WWI economic globalization – the “first globalization” –, it was clear for the negotiators at the Paris Conference that to improve labour conditions worldwide an international labour organization was needed, as “the failure of any nation to adopt humane conditions of labour is an obstacle in the way of other nations which desire to improve the conditions in their own countries” (Treaty of Versailles, Part XIII, preamble, par. 3). Among the urgent priorities for improvement, they identified wages and set an ambitious objective for them: the provision of an adequate living wage, understood as a minimum wage.

The Office was confronted with the issue very early on, just after the first session of the Conference in 1919. It had to face the complexity of the question, and this with a dramatic lack

of available international comparative information and data. It worked extensively on wages statistics in the following years. To do so, it developed a capacity to collaborate closely with national statistical institutions, notably in creating a new dedicated institution, the International Conference of Labour Statisticians (ICLS); which still exist and has celebrated its 90th anniversary at its 19th session in 2013. The explicit aim was to measure the extent of social dumping, the comparative advantage of reducing the cost of production through wages limitation. The Office undertook also an extensive review of existing legislation and practice regarding minimum wage worldwide. The ultimate objective of this statistical and research work was to provide the relevant background information for the development of international labour standards on wages.

The opportunity to move forward in this direction came up with the decision of the Governing Body to place the issue on the agenda of the 1927 Conference, following a proposal of the British Government delegate. Britain, as a major industrialized country with minimum wage legislation, was obviously keen to have other countries adopt such legislation and ensure a level playing field in international trade. Other delegates had a very cautious reaction to the initial proposal, even though it was a “modest one”, only dealing with minimum wage fixing machinery. After discussion, revision and clarification, the proposal was finally adopted with the clear understanding that it had a very limited scope: the intention was in no way to fix wages or an international minimum by a convention, but just to set general principles for national governments to establish minimum wage-fixing machinery. At this occasion, the Office refined the procedure for preparing, discussing and adopting conventions and recommendations. It introduced a double discussion procedure, whereby after a first discussion at the Conference, a detailed questionnaire was sent by the Office to governments to prepare the second discussion, the following year. At the end of the whole process, the Conference adopted in June 1928 Convention 26 and Recommendation 30 on Minimum Wage-Fixing Machinery.

The notion of a living wage does not appear in these two instruments. The issue of determining the level of the minimum wages is not even dealt with in the Convention. In the Recommendation, there is a provision referring somehow to it: “For the purpose of determining the minimum rates of wages to be fixed, the wage-fixing body should in any case take account of the necessity of enabling the workers concerned to maintain a suitable standard of living.” (A, III). However, the reference proposed to define the actual wage level does not relate directly to the living requirements of the workers, but more generally to prevailing practice in similar trades with effective collective agreements or to the general level of wages in the country or in the locality. This achievement is very far from the objective set in the Peace Treaty, and this is well reflected in the address of the first Director of the Office, Albert Thomas, to the Conference in 1931. Even though what has been done in the field of wages during the first decade of the ILO seems impressive, especially for a new institution with few comparable experiences to build upon, Albert Thomas considered that very little was achieved: “On the question of wages, it must be confessed that our Organization has accomplished very little. In these ten years the problem has not been dealt with as broadly or as courageously as it should.” And he pointed out clearly what should be the objective for the years to come: “[...] what is needed is to define a possible wage policy for the Organization. In other words, what is the practical significance of the definition given in the Treaty of Peace – an adequate living wage.” (Thomas 1948, pp. 91-92).

The issue of minimum wages came back on the agenda of the ILO in the 1960s. The context was dramatically different from the 1920s, especially with the substantial expansion of ILO membership and a corresponding wider variety of interests represented with the great number of new Nation States in the previously colonized territories. The initiative this time came from workers’ delegates through a resolution on minimum living standards submitted at the Conference in 1964. The resolution had a much broader scope than the previous endeavour and it was explicitly put in the context of the “solemn obligation”, stated in the Declaration of Philadelphia, to achieve the objective of “a minimum living wage to all employed”. It also introduced two new and important dimensions to the notion of a living wage: social security

benefits as a factor determining living standards, together with wages; and the need for periodical adjustments for both of them. The resolution was adopted almost unanimously by the Conference and called for a series of studies to be undertaken by the Office and a proposal to be worked out for the revision of the minimum wage-fixing machinery Conventions and Recommendations.

As a follow-up, the Office convened a meeting of experts to examine the problems related to minimum wage fixing, notably in developing countries, and the ways in which the existing Conventions and Recommendations might be revised. The report of the meeting served as a basis to move forward. It is worth noting that, with regard to criteria for minimum wage fixing, it does not refer to the notion of a “living wage”, but that of “workers’ needs”. It also introduces a new criterion, not traditionally used, “economic development”, and stresses the importance of taking into account the development needs and possibilities of the country. Moreover, rather than a revision, the report favours the adoption of a new Convention supplemented by a Recommendation, which would not affect existing instruments. After discussing the report, the Governing Body decided to put the issue on the agenda of the 1969 Conference, for examination under the double-discussion procedure. This led to the adoption by the Conference in June 1970 of the Convention 131 and Recommendation 135 on Minimum Wage Fixing. The objective of a “living wage” is re-introduced in these instruments under the notion of “the needs of workers and their families” as a criterion to determine the level of minimum wages, taking into account the general level of wages in the country, the cost of living, social security benefits and the relative living standard of other social groups. But economic factors should also be taken into consideration in fixing minimum wage levels, including the requirements of economic development, levels of productivity and the desirability of attaining and maintaining a high level of employment.

This achievement can be considered as being below the initial ambition of “the provision of an adequate living wage”, or from the objective of “a minimum living wage to all employed” set in the Declaration of Philadelphia. However, it reflects the complexity and practical difficulties to actually implement a broad principle stated at historical moments. Even if they are not up to the stated ambition, existing ILO Conventions and Recommendations on minimum wage fixing nevertheless provide relevant guidelines to establish national minimum wage systems with the explicit view to ensure a living wage to all employed. Moreover, the extensive tripartite deliberative process the ILO went through on the issue, in the course of its long history, involved a wide range of conflicting interests and mobilized a broad worldwide expertise. In the current context of a renewed interest in the principle of a living wage, this experience can bring useful information into the debate and shed light on the questions and difficulties raised by the practical implementation of this principle.

References

- Anker, R. 2011. *Estimating a Living Wage: A methodological review*, Conditions of Work and Employment Series No. 29. Geneva: ILO.
- ILO. 1920a. *Report presented to the Peace Conference by the Commission on International Labour Legislation*. Available at http://www.ilo.org/public/libdoc/ilo/1920/20B09_3_engl.pdf
- _____. 1920b. *Minutes of the Second Session of the Governing Body of the International Labour Office, held in Paris, January 26-28, 1920*. ILO.
- _____. 1923a. *Official Bulletin, volume I, April 1919-August 1920*. Geneva: ILO.
- _____. 1923b. *Methods of Statistics and Hours of Labour, Report prepared for the International Conference of Labour Statisticians (29 October to 2 November 1923), Studies and Reports, Series N (Statistics) No. 2*. Geneva: ILO (Kraus Reprint, 1975).
- _____. 1924. *International Conference of Labour Statisticians, Report on the International Conference of Representatives Labour Statistical Departments, held at Geneva, 29 October to 2 November 1923, Studies and Reports, Series N (Statistics) No. 4*. Geneva: ILO (Kraus Reprint, 1975).
- _____. 1925. *Minutes of the 29th Session of the Governing Body of the International Labour Office, Geneva, October 1925*. Geneva: ILO.
- _____. 1926. *Minutes of the 30th Session of the Governing Body of the International Labour Office, Geneva, January 1926*. Geneva: ILO.
- _____. 1927a. "Minimum Wages and the International Labour Conference", *International Labour Review*, Vol. 15, No. 5, pp. 669-680.
- _____. 1927b. *Minimum Wage-Fixing Machinery, An International Study of Legislation and Practice, Studies and Reports, Series D (Wages and Hours of work) No.17*. Geneva: ILO.
- _____. 1927c. *Minimum Wage-Fixing Machinery, Report and Draft Questionnaire, Item II on the Agenda, International Labour Conference, Tenth Session, Geneva, 1927*. Geneva: ILO.
- _____. 1928. *Report on Minimum Wage-Fixing Machinery, First Item on the Agenda, International Labour Conference, Eleventh Session, Geneva, May 1928*. Geneva: ILO.
- _____. 1931. *The International Labour Organization: The First Decade*. London: George Allen & Unwin.
- _____. 1934. *The International Standardisation of Labour Statistics, A Review of the Statistical Work of the International Labour Office and of Various International Statistical Conferences, Studies and Reports, Series N (Statistics) No. 19*. Geneva: ILO (Kraus Reprint, 1975).

-
- _____ 1939. *The Minimum Wage, An International Survey, Studies and Reports, Series D (Wages and Hours of work) No.22*. Geneva: ILO.
- _____ 1944a. *Future Policy, Programme and Status of the International Labour Organisation, Report I*, International Labour Conference, Twenty-Sixth Session, 1944. Montreal: ILO.
- _____ 1944b. *Record of Proceedings*, International Labour Conference, Twenty-Sixth Session, Philadelphia, 1944. Montreal: ILO.
- _____ 1948. *Record of Proceedings*, International Labour Conference, Twenty-Ninth Session, Montreal, 1946. Montreal: ILO.
- _____ 1965. *Record of Proceedings*, International Labour Conference, Forty-Eight Session, Geneva, 1964. Geneva: ILO.
- _____ 1967a. *Composition and Agenda of Committees and of Various Meetings, Fifteenth Item on the Agenda*, Governing Body, 168th Session, 27 February-3 March 1967. ILO Archives, GB 168-100-15.
- _____ 1967b. *Meeting of Experts on Minimum Wage Fixing and Related Problems, with Special Reference to Developing Countries, Report, Document MEMW/167/D. 8*. ILO Archives, GB 170-100-6.
- _____ 1967c. *Meeting of Experts on Minimum Wage Fixing and Related Problems, with Special Reference to Developing Countries, Appendix II*. ILO Archives, GB 170-100-2.
- _____ 1967d. *Minutes of the 170th Session of the Governing Body, Geneva 14-17 November 1967*. Geneva: ILO.
- _____ 1968. *Minimum Wage Fixing and Related Problems, with Special Reference to Developing Countries, Report VII (1), Seventh Item on the Agenda*, International Labour Conference, Fifty-Third Session, Geneva, 1969. Geneva: ILO.
- _____ 1969a. *Minimum Wage Fixing and Related Problems, with Special Reference to Developing Countries, Report VII (2), Seventh Item on the Agenda*, International Labour Conference, Fifty-Third Session, Geneva, 1969. Geneva: ILO.
- _____ 1969b. *Minimum Wage Fixing and Related Problems with Special Reference to Developing Countries, Report V (1), Fifth Item on the Agenda*, International Labour Conference, Fifty-Fourth Session, Geneva, 1970. Geneva: ILO.
- _____ 1970. *Record of Proceedings*, International Labour Conference, Fifty-Third Session, Geneva, 1969. Geneva: ILO.
- _____ 1971. *Record of Proceedings*, International Labour Conference, Fifty-Fourth Session, Geneva, 1970. Geneva: ILO.
- League of Nations. 1920. *International Labor Conference, First Annual Meeting, October 29, 1919 – November 29, 1919, Washington D.C., U.S.A.* Washington: Government Printing Office.

-
- _____. 1927. *International Labour Conference, Tenth Session, Geneva, 1927, Volume I, First, Second and Third Parts*. Geneva: ILO.
- _____. 1928. *International Labour Conference, Eleventh Session, Geneva, 1928, Volume I, First, Second and Third Parts*. Geneva: ILO.
- Marinakis, A. 2008. *The Role of the ILO in the Development of Minimum Wages*, ILO Century Project. Geneva: ILO. Available at:
http://www.ilo.org/global/docs/WCMS_180793/lang--en/index.htm
- Nixon, J. 1920. *Note sur le minimum de salaire*. ILO Archives, Registry files, N 104/0/0.
- Phelan, E.J. 1934a. "The Commission on International Labor Legislation", in Shotwell 1934a, pp. 127-198.
- _____. 1934b. "The Labor Proposals before the Peace Conference", in Shotwell 1934a, pp. 199-220.
- Shotwell, J.T. (ed.) 1934a. *The Origins of the International Labor Organization, vol. I, History*. New York: Columbia University Press.
- _____. 1934b. *The Origins of the International Labor Organization, vol. II, Documents*. New York: Columbia University Press.
- Thomas, A. 1948. *International Social Policy*. Geneva: ILO.
- Wolfe, H. 1925. *Memorandum on wages item proposed by the British Government for insertion on the 1927 agenda*. ILO Archives, Registry files, N 104/0/1.

Conditions of Work and Employment Series

- No. 1 Quality of working life: A review on changes in work organization, conditions of employment and work-life arrangements (2003), by Howard Gospel
- No. 2 Sexual harassment at work: A review of preventive measures (2005), by Deirdre McCann
- No. 3 Statistics on working time arrangements based on time-use survey data (2003), by Andrew S. Harvey, Jonathan Gershuny, Kimberly Fisher & Ather Akbari
- No. 4 The definition, classification and measurement of working time arrangements (2003), by David Bell & Peter Elias
- No. 5 Reconciling work and family: Issues and policies in Japan (2003), by Masahiro Abe, Chizuka Hamamoto & Shigeto Tanaka
- No. 6 Reconciling work and family: Issues and policies in the Republic of Korea (2004), by Tae-Hong Kim & Hye-Kyung Kim
- No. 7 Domestic work, conditions of work and employment: A legal perspective (2003), by José Maria Ramirez-Machado
- No. 8 Reconciling work and family: Issues and policies in Brazil (2004), by Bila Sorj
- No. 9 Employment conditions in an ageing world: Meeting the working time challenge (2004), by Annie Jolivet & Sangheon Lee
- No. 10 Designing programmes to improve working and employment conditions in the informal economy: A literature review (2004), by Dr. Richard D. Rinehart
- No. 11 Working time in transition: The dual task of standardization and flexibilization in China (2005), by Xiangquan Zeng, Liang Lu & Sa'ad Umar Idris
- No. 12 Compressed working weeks (2006), by Philip Tucker
- No. 13 Étude sur les temps de travail et l'organisation du travail: Le cas du Sénégal. Analyse juridique et enquête auprès des entreprises (2006), by Alfred Inis Ndiaye
- No. 14 Reconciling work and family: Issues and policies in Thailand (2006), by Kyoko Kusakabe
- No. 15 Conditions of work and employment for older workers in industrialized countries: Understanding the issues (2006), by N.S. Ghosheh Jr., Sangheon Lee & Deirdre McCann
- No. 16 Wage fixing in the informal economy: Evidence from Brazil, India, Indonesia and South Africa (2006) by Catherine Saget
- No. 18 Reconciling work and family: Issues and policies in Trinidad and Tobago (2008), by Rhoda Reddock & Yvonne Bobb-Smith
- No. 19 Minding the gaps: Non-regular employment and labour market segmentation in the Republic of Korea (2007) by Byung-Hee Lee & Sangheon Lee
- No. 20 Age discrimination and older workers: Theory and legislation in comparative context (2008), by Naj Ghosheh

-
- No. 21 Labour market regulation: Motives, measures, effects (2009), by Giuseppe Bertola
- No. 22 Reconciling work and family: Issues and policies in China (2009), by Liu Bohong, Zhang Yongying & Li Yani
- No. 23 Domestic work and domestic workers in Ghana: An overview of the legal regime and practice (2009), by Dzodzi Tsikata
- No. 24 A comparison of public and private sector earnings in Jordan (2010), by Christopher Dougherty
- No. 25 The German work-sharing scheme: An instrument for the crisis (2010), by Andreas Crimmann, Frank Weissner & Lutz Bellmann
- No. 26 Extending the coverage of minimum wages in India: Simulations from household data (2010), by Patrick Belser & Uma Rani
- No. 27 The legal regulation of working time in domestic work (2010), by Deirdre Mc Cann & Jill Murray
- No. 28 What do we know about low-wage work and low-wage workers (2011), by Damian Grimshaw
- No. 29 Estimating a living wage: a methodological review (2011), by Richard Anker
- No. 30 Measuring the economic and social value of domestic work: conceptual and methodological framework (2011), by Debbie Budlender
- No. 31 Working Time, Health, and Safety: a Research Synthesis Paper (2012), by Philip Tucker & Simon Folkard
- No. 32 The influence of working time arrangements on work-life integration or 'balance': A review of the international evidence (2012), by Colette Fagan, Clare Lyonette, Mark Smith & Abril Saldaña-Tejeda
- No. 33 The Effects of Working Time on Productivity and Firm Performance: a research synthesis paper (2012), by Lonnie Golden
- No. 34 Estudio sobre trabajo doméstico en Uruguay (2012), by Karina Batthyány
- No. 35 Why have wage shares fallen? A panel analysis of the determinants of functional income distribution (2012), by Engelbert Stockhammer
- No. 36 Wage-led or Profit-led Supply: Wages, Productivity and Investment (2012), by Servaas Storm & C.W.M. Naastepad
- No. 37 Financialisation and the requirements and potentials for wage-led recovery – a review focussing on the G20 (2012), by Eckhard Hein & Matthias Mundt
- No. 38 Wage Protection Legislation in Africa (2012), by Naj Ghosheh
- No. 39 Income inequality as a cause of the Great Recession? A survey of current debates (2012), by Simon Sturn & Till van Treeck
- No. 40 Is aggregate demand wage-led or profit-led? National and global effects (2012), by Özlem Onaran & Giorgos Galanis

-
- No. 41 Wage-led growth: Concept, theories and policies (2012), by Marc Lavoie & Engelbert Stockhammer
- No. 42 The visible face of Women's invisible labour: domestic workers in Turkey (2013), by Seyhan Erdoğan & Gülay Toksöz
- No. 43 In search of good quality part-time employment (2014), by Colette Fagan, Helen Norman, Mark Smith & María C. González Menéndez
- No. 44 The use of working time-related crisis response measures during the Great Recession (2014), by Angelika Kümmerling & Steffen Lehndorff
- No. 45 Analysis of employment, real wage, and productivity trends in South Africa since 1994 (2014), by Martin Wittenberg
- No. 46 Poverty, inequality and employment in Chile (2014), by Sarah Gammage, Tomás Alburquerque & Gonzalo Durán
- No. 47 Deregulating labour markets: How robust is the analysis of recent IMF working papers? (2014), by Mariya Aleksynska
- No. 48 Growth with equity in Singapore: Challenges and prospects (2014), by Hui Weng Tat & Ruby Toh
- No. 49 Informality and employment quality in Argentina, Country case study on labour market segmentation (2014), by Fabio Bertranou, Luis Casanova, Maribel Jiménez & Mónica Jiménez
- No. 50 Comparing indicators of labour market regulations across databases: A post scriptum to the employing workers debate (2014), by Mariya Aleksynska & Sandrine Cazes
- No. 51 The largest drop in income inequality in the European Union during the Great Recession: Romania's puzzling case (2014), by Ciprian Domnisoru
- No. 52 Segmentation and informality in Vietnam: A survey of literature, Country case study on labour market segmentation (2014), by Jean-Pierre Cling, Mireille Razafindrakoto & François Roubaud
- No. 53 A chronology of employment protection legislation in some selected European countries (2014), by Mariya Aleksynska & Alexandra Schmidt
- No. 54 How tight is the link between wages and productivity? A survey of the literature (2014), by Johannes Van Biesebroeck
- No. 55 Job quality in segmented labour markets: The Israeli case, Country case study on labour market segmentation (2014), by Shoshana Neuman
- No. 56 The organization of working time and its effects in the health services sector: A comparative analysis of Brazil, South Africa, and the Republic of Korea (2014), by Jon Messenger & Patricia Vidal
- No. 57 The motherhood pay gap: A review of the issues, theory and international evidence (2015), by Damian Grimshaw & Jill Rubery

-
- No. 58 The long journey home: The contested exclusion and inclusion of domestic workers from Federal wage and hour protections in the United States (2015), by Harmony Goldberg
- No. 60 Negociación colectiva, salarios y productividad: el caso uruguayo (2015), by Graziela Mazzuchi, Juan Manuel Rodríguez y Eloísa González
- No. 61 Non-standard work and workers: Organizational implications (2015), by Elizabeth George & Prithviraj Chattopadhyay
- No. 62 What does the minimum wage do in developing countries? A review of studies and methodologies (2015), by Dale Belman & Paul Wolfson
- No. 63 The regulation of non-standard forms of employment in India, Indonesia and Viet Nam (2015), by Ingrid Landau, Petra Mahy & Richard Mitchell
- No. 64 The regulation of non-standard forms of employment in China, Japan and the Republic of Korea (2015), by Fang Lee Cooke & Ronald Brown
- No. 65 Re-regulating for inclusive labour markets (2015), by Jill Rubery
- No. 66 Minimum wage setting practices in domestic work: An inter-state analysis (2015), by Neetha N.
- No. 67 The effects of non-standard forms of employment on worker health and safety (2015), by Michael Quinlan
- No. 68 Structural change and non-standard forms of employment in India (2016), by Ravi Srivastava
- No. 69 Non-standard forms of employment in some Asian countries: A study of wages and working conditions of temporary workers (2016), by Huu-Chi Nguyen, Thanh Tam Nguyen-Huu & Thi-Thuy-Linh Le
- No. 70 Non-standard forms of employment in Uganda and Ghana (2016), by Christelle Dumas & Cédric Houdré
- No. 71 The rise of the “just-in-time workforce”: On-demand work, crowdwork and labour protection in the “gig-economy” (2016), by Valerio De Stefano
- No. 72 The introduction of a minimum wage for domestic workers in South Africa (2016), by Debbie Budlender
- No. 73 Productivity, wages and union in Japan (2016), by Takao Kato
- No. 74 Income security in the on-demand economy: Findings and policy lessons from a survey of crowdworkers (2016), by Janine Berg
- No. 75 Non-Standard forms of employment in Latin America. Prevalence, characteristics and impacts on wages (2016), by Roxana Maurizio
- No. 76 Formas atípicas de empleo en América Latina: Incidencia, características e impactos en la determinación salarial (2016), by Roxana Maurizio
- No. 77 Firms’ demand for temporary labour in developing countries: Necessity or strategy? (2016), by Mariya Aleksynska & Janine Berg

-
- No. 78 Remembering rest periods in law (2016), by Naj Ghosheh
- No. 79 Initial effects of Constitutional Amendment 72 on domestic work in Brazil (2016), by the Institute for Applied Economic Research (IPEA)
- No. 80 Coverage of employment protection legislation (EPL) (2016), by Mariya Aleksynska & Friederike Eberlein
- No. 81 Emplois atypiques et résultats sur le marché du travail au Cameroun, en République Démocratique du Congo et au Tchad (2016), by Benjamin Fomba Kamga, Vincent de Paul Mboutchouang & Gaston Brice Nkoumou Ngoa
- No. 82 Impacto de las reformas legislativas en el sector del empleo del hogar en España (2016), by Magdalena Diaz Gorfinkel
- No. 83 Redistributing value added towards labour in apparel supply chains: tackling low wages through purchasing practices (2016) by Doug Miller & Klaus Hohenegger
- No. 84 Resultados de las reformas jurídicas relativas a las trabajadoras y los trabajadores domésticos en Uruguay (2016), by Alma Espino González
- No. 85 Evaluating the effects of the structural labour market reforms on collective bargaining in Greece (2016), by Aristeia Koukiadaki & Damian Grimshaw
- No. 86 Purchasing practices and low wages in global supply chains Empirical cases from the garment industry (2016), by Mark Starmanns
- No. 87 Sectoral collective bargaining, productivity and competitiveness in South Africa's clothing value chain: manufacturers between a rock and a hard place (2017), by Shane Godfrey, Trenton Elsley & Michaelle Taal
- No. 88 Mapping Employment Dismissal Law: A Leximetric Investigation of EPL Stringency and Regulatory Style (2017), by Benoit Pierre Freyens & J.H. Verkerke