

A New Regime of Labour Governance in Mexico? The Case of Atento Call Centres

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ABSTRACT

Since 2018, the mechanisms governing labour relations in Mexico have experienced marked transformations at both the national and transnational scales. Terms of the US-Mexico-Canada Agreement (USMCA) and reforms to the Federal Labor Law aimed at raising wages and promoting union freedom and democracy reshaped the landscape of labour regulation in the country, especially in strategic export sectors. Research on the impacts these reforms has privileged Mexican industrial manufacturing exports and the automotive industry. In this article, I examine the role of the USMCA's Rapid Response Labor Mechanism in the Sindicato de Telefonistas de la República Mexicana (Telephonists' Union of the Mexican Republic)'s campaign for collective representation and bargaining for Atento call centre workers in the city of Pachuca. Through a documentary review of primary and secondary source materials, I analyse the achievements and limits of this new, transnational regime of labour governance for labour rights at Atento call centres.

KEYWORDS

labour governance; rapid response; labour mechanism, Mexico, Atento, USMCA

Introduction

Since 2018, the national and transnational mechanisms governing labour relations in Mexico have experienced marked transformations. Reforms to the Federal Labour Law and the negotiated terms of the US-Mexico-Canada Agreement (USMCA) aimed at raising wages and promoting union freedom and democracy reshaped the landscape of labour regulation in the country, especially in strategic export sectors.

Research on the impacts of these reforms has privileged industrial manufacturing exports and, specifically, the automotive industry (Martínez Silva & Ocampo Pérez, 2024; Foust-Rodríguez & Román-Morales, 2024; Ocampo Merlo, 2022). In this article, I focus on the outsourced professional services provided by call or contact centres. I examine the role of the USMCA's United States-Mexico Facility-Specific Rapid Response Labour Mechanism (RRLM) in the Sindicato de Telefonistas de la República Mexicana (Telephonists' Union of the Mexican Republic, STRM)'s campaign for independent collective representation and bargaining at Atento. Through a review of primary and secondary source materials, including collective bargaining agreements and union records made public through Mexico's digital Information Repository of Labour Records and U.S. submissions in the RRLM Panel process, I analyse the impact of this new, transnational regime of labour governance on

freedom of association and collective bargaining rights at Atento call centres in the city of Pachuca, Hidalgo.

In what follows, I deploy an understanding of labour regimes and governance grounded in regulation theory to describe the prevailing regime of labour governance in Mexico prior to 2018, then outline transformations therein enacted as a result of the 2019 federal labour law reform and USMCA. Subsequently, I review the STRM's efforts to unionise Atento workers, and reconstruct the events of the STRM's campaign in Pachuca to date. I close with a balance of the impacts of the new labour governance regime on the exercise of labour rights at Atento and offer reflections on the broader implications for workers on the disadvantaged extremes of global value chains in Mexico and beyond.

Regimes of Labour Governance

Conceptions of labour regimes can be situated within a genealogy of regulation theory concerned with the mechanisms of reproduction of the capitalist mode of production, both within and beyond strictly economic relations. For Jessop and Sum, the regulationist approach is a theoretical frame that “explores the interconnections between the institutional forms and dynamic regularities of capitalist economies” (2006: 3). This perspective is interested in the interplay between production and exchange relations and extra-economic relations of governance and ideology in reproducing particular structures of accumulation, their transformations, and ruptures in history.

Jessop defines a regime of capital accumulation as “a complementary pattern of production and consumption that is reproducible over a long period; and a mode of growth as a coherent combination of accumulation regime and mode of regulation” (2013: 8), the latter understood as “an ensemble of norms, institutions, organisational forms, social networks, and patterns of conduct that can temporarily stabilise an accumulation regime through its *regulation-cum-governance* of specific structural forms despite the conflictual and antagonistic nature of capitalist social relations” (2013: 8). These arrangements are always contingent and relative. Central to the notion of an accumulation regime is the response to and deferral of crisis: regimes only offer an apparent fix to capitalism's contradictions, which are only ever “contingently resolved, always provisionally and partially,” according to the prevailing balance of forces in a given time and place (Jessop, 2013: 18).

Building on this tradition, Baglioni et al. incorporate feminist analyses of social reproduction to define labour regimes as “historically formed, multi-scalar phenomena resulting from the articulation of struggles over local social relations, and their direct or indirect intersections with the commercial demands of lead firms in global production networks and with the gendered and racialised politics of social reproduction” (2022: 3). The labour regime, then, “signals the combination of social relations and institutions that bind capital and labour in a form of antagonistic relative stability in particular times and places” (Baglioni, Campling, Coe, & Smith, 2022: 1).

The notion of labour regimes owes much to Burawoy's “factory regimes,” which expand beyond Braverman's (1998) focus on the workplace and deskilling to include considerations of the national political-economic context of regulation and intervention. Authors have derived additional formulations, such as Jonas's “local labour control regime” (1996), which emphasises social practices and institutions that regulate local labour markets, including consumption, reproduction, and ideology, in a historically-specific and territorially-embedded context. Anner (2015), for his part, theorises “regimes of labour control” within the broader context of global apparel value chains, for which he identifies corresponding strategies of worker resistance.

Conceptions of labour governance are situated somewhat adjacent to these critical discussions and more strictly concerned with institutional frameworks. Becker and Calderón define labour governance as the “form of coordination between public and private actors” in the context of “global production chains and the multilateral structuring of regulation and ordering mechanisms for global labour relations” (2022: 156).¹ These authors identify two principal paradigms of labour governance: the first, production-oriented, is associated with models of government regulation and tripartite negotiation between the state, capital, and labour; the second, consumption-oriented, is associated with largely private regulation models like corporate social responsibility, consumer pressure campaigns, and global framework agreements. Since the crisis of Fordist-Keynesianism and the global productive restructuring that inaugurated the regime of flexible accumulation that we associate with neo-liberalism (Harvey, 1998), the latter paradigm has largely prevailed across global value chains. Indeed, Appelbaum (2016: 49) writes that this turn to corporate self-regulation “represents a key shift in economic governance: from public to private regulation and enforcement,” and a highly profitable one at that.

With all this in mind, in this article, I use the term “regime of labour governance” to refer to the temporally and territorially specific, multi-scalar ensemble of institutional, social, and economic mechanisms that structure and regulate labour relations, in this case, in Mexico and, more specifically, at Atento call centres.

Employer Protection Unionism

Prior to the USMCA and associated reforms, labour governance in Mexican export sectors was characterised by “employer protection unionism.” Xelhuanzi López describes protection unions, also known as “ghost unions” or “letterhead unions,” as “the fullest and most excessive expression of Mexican corporativism” (2007: 102), with the principal objective of formalising an employer protection contract. Such collective bargaining agreements (CBAs) are typically negotiated between employers and an employer-selected union, which exists on paper alone, with government complicity and without worker knowledge or participation. Protection contracts are drawn up between the employer and the general secretary of a protection union, establishing only the bare legal minimum conditions and allowing the employer to evade bilateral negotiations over working conditions (Bensusán, 2007). Protection unionism suppresses wages and benefits while pre-emptively blocking independent collective bargaining.

From 1940 to 1980, protection unionism was regionally confined to the central State of Mexico. It wasn't until the neo-liberal restructuring on the 1980s that it was adopted in strategic sectors nationally, including the ballooning maquiladora sector, the newly-privatized banking, telecommunications, and aviation sectors, and outsourcing, as a “pragmatic solution to the problems of labour governability in a context of globalization and commercial deregulation” (Bensusán, 2007: 14). This arrangement allowed the Mexican state of “offer a degree of security and attract investment that would probably not have arrived is the collective rights recognized to Mexican workers on paper—more radical than those of other countries—were freely put into practice” (Bensusán, 2007: 22). This was especially relevant in emergent export sectors dominated by foreign capital whose competitiveness was based on low wages and flexibility, including call centres. Despite the precaritization and flexibilization of Mexican labour markets and working conditions and wage stagnation, this labour

¹ All translations are mine, unless otherwise indicated in the corresponding bibliographic reference.

governance regime “managed, surprisingly, to push down wages without upsetting the industrial peace” throughout the neo-liberal period (Bensusán, 2020: 4). By 2016, the minimum wage represented 25% less than its 1982 value in real terms (Bensusán, 2020: 6). Prior to the 2019 labour reforms, estimates place the proportion of protection contracts at above 80% nationally (Alcalde, 2023: 23).

Employer protection unionism was therefore firmly associated with neo-liberalism in Mexico. This accumulation regime was implemented through restructuring amid the 1980s debt crisis, reducing the state’s role in both strategic industries and welfare programs to support social reproduction. Structural adjustment reinserted the Mexican economy into the world market as a supplier of low-wage labour for outsourced manufacturing export platforms and, not incidentally, low-wage migrant labour to the deindustrialising U.S. economy (Delgado Wise & Márquez Covarrubias, 2007). The institutional infrastructure for this regime was provided for by successive privatisation, liberalisation, and deregulation reforms and transnational mechanisms, including the 1994 North American Free Trade Agreement (NAFTA), which included no references to international labour standards and was pilloried by U.S. unions for its weak, toothless enforcement arm (Scherrer, 2020). By 2018, however, the crisis of neo-liberal hegemony in Mexico and beyond created the conditions for a transformation of this governance infrastructure.

Mechanisms of new labour governance

The new institutional mechanisms of labour governance in Mexico were principally provided by the 2018 USMCA negotiations and the 2019 Labour Reform. Nevertheless, the roots of these transformations date back to decades-long struggles by Mexico’s independent labour movement and, more recently, to a reform process initiated by negotiations for the failed Trans-Pacific Partnership agreement (Bensusán, 2020). Concretely, the reforms were advanced thanks to the progressive commitments of the López Obrador administration (2018-2024) and the pressures of U.S. and Canadian labour unions in the USMCA negotiations to counter so-called “social dumping” practices, with the goal of securing binding mechanisms to prompt wage growth in Mexico and thereby prevent job loss from the U.S. and Canada (Vega Cánovas & Berasaluce Iza, 2023). They were anticipated by a 2017 constitutional reform which favoured a new labour justice system independent of the executive, eliminating Local Conciliation and Arbitration Boards and mandating union democracy and transparency.

The bulk of USMCA labour provisions were contained in Chapter 23 and Annexe 23-A, which guarantee the rights to authentic collective bargaining, effective union democracy, and freedom of association. Article 23.3 committed the parties to the rights enshrined in the Declaration of the International Labour Organisation (ILO). Annexe 23-A committed Mexico to implementing laws necessary to conform to Chapter 23, including to guarantee workers’ rights to participate in collective bargaining and to freely organise, form, and affiliate with the union of their choice, as well as prohibiting employer interference in union activities, discrimination, coercion, or refusal to bargain with legally recognised labour unions. It also committed Mexico to establishing independent and impartial bodies to register union elections and CBAs and adjudicate labour conflicts, oversee and ensure free and fair union elections, verify that collective contracts have majority workplace support through democratic elections, and facilitate electronic access to existing contracts. The agreement established a four-year period for the verification of Mexico’s existing CBAs, from 2018 through 2023 (USMCA, 2018: 31-A-1).

In November 2018, Mexico ratified ILO Convention 98 on the right to organise and collective bargaining. On May 1, 2019, Mexico implemented a sweeping reform to the Federal Labour Law that legislated the constitutional changes in favour of union autonomy, transparency, democracy, and gender proportionality, with a transitional process for the legitimization of existing CBAs. This was accompanied by a 2019 law to reform subcontracting practices, as well as historic minimum wage increases and a suite of cash transfer programs to remunerate care and domestic work, provide stipends for public university and high school students, extend pensions to the elderly and disabled, provide support for small agricultural producers, and provide jobs for rural workers. Together with the trade deal's 2020 implementation, these changes provided the infrastructure for a markedly distinct labour regime in Mexico.

Table 1. Selected Mechanisms of the New Labour Governance Regime in Mexico

INSTRUMENT		MECHANISMS	SCALE	DATE
ILO	Convention 98	Rights to organise, collective bargaining	Transnational	November 23, 2018
USMCA	Appendix to Annexe 4-B, Art. 4-B.7	Establishes Labour Value Content	Transnational (North America)	July 1, 2020
	Chapter 23	Commitments to labour rights in the ILO Declaration, including to collective representation and bargaining		
	Annexe 23-A	Commits Mexico to legislating labour commitments, including the CBA legitimization process		
	Annexe 31-A, 31-B	Establishes RRLM		
Constitution	Reforms to Articles 107, 123	Establishes a new labour justice system in the judicial branch, mandates union democracy and transparency	National	February 24, 2017
Federal legislation	Federal Labour Law reforms	Establishes transitional CBA legitimization process; regulates collective representation elections; regulates CBA approval elections; regulates union leadership elections; mandates gender proportionality in union leadership; mandates transparency in union administration; creates CFCRL	National	May 1, 2019
		Creates Federal and Local Conciliation Centres	National and Local	
		Creates Federal and Local Labour Courts	National and Local	
	Reforms to Federal Labour Law, Social Security Law, National Housing Fund	Prohibits outsourcing key functions; regulates outsourcing of specialised activities; prohibits outsourcing of Federal	National	April 23, 2021

	Institute Law, Federal Tax Code, Income Tax Law, Federal Law for Workers at the Service of the State	government personnel; and formalises employment of subcontracted workers		
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Source: Author elaboration

The CBA review and legitimation process took place between May 2019 and July 2023, with mixed results. The government terminated more than 100,000 of the 139,000 registered CBAs upon initial examination. Of the remaining 30,600 that went to a vote, however, approximately 99% were approved. Polaski writes, “Observers consider that outcome to reflect a weakness of the transition process, in which the legitimation votes were organized and run by the incumbent union with limited oversight by the government, giving rise to concerns about the inherent conflict of interest involved and amid reports of misinformation, bribery, harassment, surveillance, or other intimidation of voters” (2023: 18-19). Indeed, Bensusán observes that “many of the union elections and contract legitimations did not end the old vices of the union world, but rather, to a certain extent, they validated them” (2023: 12). Nevertheless, the CBA covering two *Atento* worksites in Pachuca proved an exception, as we will see below, and workers who faced unjust outcomes in their CBA legitimation votes had recourse to a new, transnational governance instrument.

The RRLM was established to enforce the labour commitments provided for in Chapter 23 and Annex 23-A. Annex 31-A established the RRLM as a tool to “impose remedies” and “ensure remediation of a Denial of Rights” for workers at covered facilities, defined as those in the territory of a Party that “(i) produces a good or supplies a service traded between the Parties; or (ii) produces a good or supplies a service that competes in the territory of a Party with a good or a service of the other Party” and which operate in a priority sector, defined as any that “produces manufactured goods, supplies services, or involves mining” (USMCA, 2018: 31-A-9). Article 31-A.2 reads that “The Mechanism shall apply whenever a Party (the “complainant Party”) has a good faith basis belief that workers at a Covered Facility are being denied the right of free association and collective bargaining under laws necessary to fulfil the obligations of the other Party (the “respondent Party”) under this Agreement (a “Denial of Rights”)” (USMCA, 2018: 31-A-1).

Under this process, petitions claiming a Denial of Rights at a Covered Facility could be filed by non-governmental organisations, including labour unions, as well as by the parties themselves; if the petitioned party found evidence of a Denial of Rights, as a complainant, they could request that the respondent Party review the allegations. Should the respondent accept, it would conduct a review and, if it determined a Denial of Rights had occurred, attempt remediation. The complainant could impose sanctions on the offending employer in the meantime, by suspending the “final settlement of customs accounts related to entries of goods from the Covered Facility” (USMCA, 2018: 31-A-3). If the respondent refused to conduct a review, or if the Parties were unable to reach an agreement regarding the Denial of Rights or a course of remediation, the complainant could request that a Panel of specialists be convened to determine whether a Denial of Rights had occurred and to ensure remediation.

Annexe 31-A on dispute settlement determined RRLM Panels to be comprised of three specialists with labour expertise selected by lottery from three rosters: one designated by Mexico, one by the U.S., and one joint list. Once the Panel confirmed the petition’s pertinence, it would request documentation from the respondent regarding their determination. The Panel would then conduct its own verification

process. The Panel must make its determination within 30 days after conducting verification, and not before allowing both Parties to be heard. The decision must be communicated in writing and made public. Timelines could be extended if necessary. Should a Panel determine that a Denial of Rights had occurred, the complainant could impose remedies including penalties, the suspension of preferential tariffs, or denial of entry of goods produced at the facility in question, which must be lifted once the Parties determined remediation had occurred. Should the Parties disagree, the Panel had 30 days to make a new determination. If the Panel determined no Denial of Rights had occurred, the complainant could not request another determination for 180 days.

While not explicit in the USMCA, the RRLM was, in practice, a unidirectional instrument for the U.S. to denounce labour violations in Mexico. Footnote no.2 to Chapter 31 indicated that “With respect to the United States, a claim can be brought only with respect to an alleged Denial of Rights owed to workers at a covered facility under an enforced order of the National Labour Relations Board” (USMCA, 2018: 31-A-1), establishing a nearly impossible threshold for action by workers against US-based firms. Leclercq points out that the caveat “excludes the vast majority – if not all – of the facilities in the United States” (2023: 47), as only a handful of auto facilities and trade related sectors fell under the scope of the USMCA. The footnote further blocked those few eligible workers from benefitting from the mechanism by requiring they first exhaust domestic legal remedies, usually a matter of years of litigation; worse yet, critical sectors including agricultural workers, undocumented workers, domestic workers, day labourers, and airline workers were excluded from coverage under the National Labour Relations Act and thus ineligible for recourse under the RRLM.

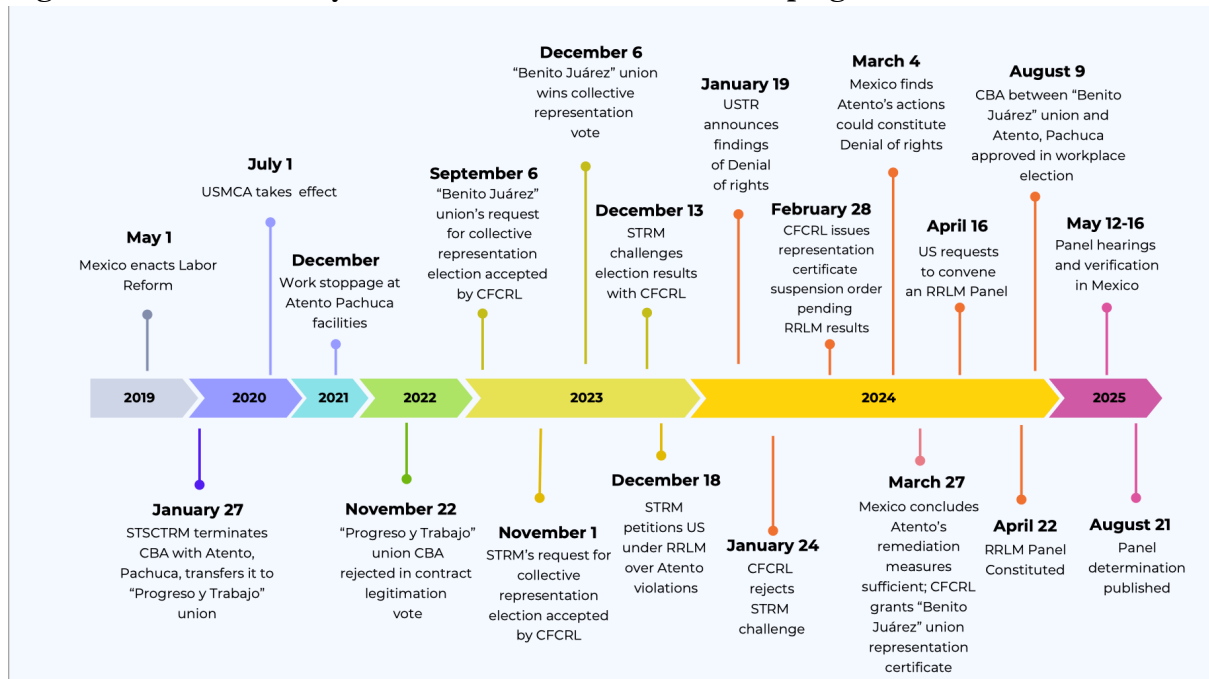
This arrangement not only left vast segments of workers in the U.S.—including Mexican migrants—vulnerable to violations, but it reproduced historical asymmetries between Mexico and its northern neighbours. Cypher and Crossa (2021) note that the USMCA offered no recourse for workers in Mexico to denounce union and business corruption in the United States. Vega Cánovas and Berasaluce Iza warn that “the more active role played by foreign countries against individual actors in ensuring compliance with Mexican regulation under this novel mechanism opens a new dimension of concessions to foreign intervention” (Vega Cánovas & Berasaluce Iza, 2023: 59). The USMCA granted the United States the role of labour monitor for Mexico; the U.S. Labor Department and Trade Representative co-chaired an Interagency Labor Committee for Monitoring and Enforcement to evaluate the implementation of Mexico’s labour reform. In this sense, Cypher and Crossa condemn the USMCA’s labour provisions as “labour neocolonialism” (2021: 84), suggesting that rather than overturning Mexico’s corporatist labour relations, the treaty aimed to legitimate them. This is the fraught infrastructure that would be mobilised, to no less contradictory ends, by the STRM in its second attempt to organise call centre workers at the Atento corporation.

The STRM Campaign in Atento, Pachuca

Already in 2007, autonomous workers in Pachuca had sought to organise an independent union, only to discover they were already represented by a protective CBA with the Sindicato de Trabajadores de Servicios, Comunicaciones y Transportes de la República Mexicana (Union of Service, Communications, and Transportation Workers of the Mexican Republic, STSCTRM). They approached the STRM for support, but the Telefonistas had ambitiously sought to target the STSCTRM’s Mexico City CBA first. Over the course of three elections for collective representation rights in 2010, 2011, and 2014, STRM Atento local Section 187 tried and failed to wrest a CBA covering

eight worksites and some 9,000 workers from the STSCTRM. The losses occurred amid an aggressive employer offensive of mass dismissals, harassment and intimidation, and even direct violence from goons hired by the protection union (Comité de Libertad Sindical, 2013; Vargas Escobar, 2016).

Figure 1. Timeline of key events in the STRM Atento campaign in Pachuca



Source: Author elaboration

Following the 2019 labour reform, the STRM returned to Atento, this time focusing on the two Pachuca worksites, Pachuca 1 and Interplaza, which by then employed 1,091 workers. Until 2020, these workers were represented by the STSCTRM, but on January 27, 2020, the union moved to terminate its CBA and, with management's blessing, transferred it directly to another protection union: the Sindicato "Progreso y Trabajo" del Transporte y Servicios de la República Mexicana ("Progress and Labour" Union of Transportation and Services of the Mexican Republic, or "Progreso y Trabajo" union). Organising began in December 2021, with a work stoppage over an unpaid performance bonus. The contract legitimization vote was held on November 22, 2022. Atento workers rejected the protection contract, with 355 votes in favour and 564 against. It was the first time a protection CBA was overturned in Mexico's call centre sector.

Following the STSCTRM's defeat, the STRM sought to secure collective representation rights. It found itself competing with another protection union, the Sindicato Nacional "Presidente Benito Juárez" de la Industria de la Comunicación de la República Mexicana ("President Benito Juárez" National Union of the Communication Industry of the Mexican Republic, or "Benito Juárez" union). The question would therefore be put to the workers in an election, the winner of which would have a period of six months for collective bargaining with the employer; that CBA would then be ratified by another workplace vote. The collective representation election was held on December 6, 2023. The result was 770 for the "Benito Juárez" union and 198 for the STRM (Centro Federal de Conciliación y Registro Laboral, 2025b).

On December 13, 2023, the STRM filed a challenge to the election process with the CFCRL, and on December 18, the union petitioned the U.S. under the RRLM, alleging violations of Mexican labour law and of International Labour Organization (ILO) Conventions 87 and 98 on the rights to freedom of association and collective bargaining, respectively. The complaint referenced arbitrary dismissals of 35 employees seeking to organise with the STRM, as well as threats and coercion against STRM sympathisers. It marked the first such RRLM petition in the telecommunications sector.

After conducting interviews with Atento workers in December and January, on January 19, 2024, the Office of the United States Trade Representative (USTR) announced it had found evidence of “flagrant employer conduct” at the Pachuca worksites, including reprisals against workers for union activities and intervention in union organising (USTR, 2024a). On January 30th, Mexico acknowledged admission of the USTR’s request for review of the case, triggering a 45-day deadline to determine whether a Denial of Rights had occurred (Secretaría de Economía; Secretaría del Trabajo y Previsión Social, 2024). During this period, Mexico circulated a questionnaire to fired workers and conducted interviews with 11 former Atento workers. In its March 4, 2024, statement, Mexico found that “certain Atento actions could constitute a Denial of Rights,” but on March 27, it reported that the company had undertaken adequate remediation measures (Secretaría de Economía, 2024). In disagreement, the USTR announced on April 16, 2024, that it would request a Panel (USTR, 2024b). It was only the second time that a claim under the RRLM had escalated to this stage.

On April 22, 2024, the three-member Panel was constituted. Pablo Lazo Grandi, a Chilean labour scholar who has served in public posts in Chile for decades, served as President; Graciela Irma Bensusán Areous, a veteran Mexican labour scholar and Kevin P. Kolben, a U.S. labour scholar and consultant appointed to the Federal Advisory Committee for Labor Provisions of Trade Agreements in the U.S. Labor Department under the Biden administration, served as panellists. The Panel accepted the petition on April 29, and Mexico presented its written submission on May 27. The U.S. issued a Reply Submission on August 30, providing evidence that included follow-up interviews with fired Atento conducted that month. On September 24, the Panel requested submissions from Atento Servicios, the STRM, and the Benito Juárez union; these were presented on October 24, 9, and 14, respectively. The U.S. and Mexico both presented Rebuttal Submissions on November 25. In May 2025, the Panel conducted a verification process and held hearings in Pachuca and Mexico City, making it only the second RRLM Panel to reach that stage. On August 21, the Panel published its determination in a provisional and partially redacted document dated July 5, 2025.

In the meantime, the protection union moved forward to secure a CBA. The CFCRL had rejected the STRM’s claim of irregularities in the collective representation election on January 24, 2023. Nevertheless, on February 28, following a February 27 suit filed by the STRM before the Fifth District Labor Court of Mexico City, the CFCRL agreed to suspend the “Benito Juárez” union’s Certificate of collective representation pending the RRLM results. This order, however, was not sustained, and the CFCRL granted the “Benito Juárez” union its certificate on March 27, 2024—the same day Mexico concluded its review process. On August 9, 2024, the CBA negotiated between Atento and the “Benito Juárez” union, which was approved by a broad margin: 693 in favour, and 160 against (CFCRL, 2025b).

U.S. Panel submissions provide a summary of these events and the arguments of both Parties. In its review, Mexico found evidence that Atento organised a worker committee for the “Benito Juárez” union, conducted worker committee elections on the company intranet, refused STRM access to the facility, impeded STRM affiliation, and offered bonuses to workers if the “Benito Juárez” union won the representation election, together with anti-union discrimination and unjustified dismissals. Mexico

alleged remediation had occurred through a series of actions negotiated with Atento during the review period, including the publication and dissemination of a neutrality statement and conduct guidelines, worker trainings on the rights of freedom of association and collective bargaining, settlement payments to five workers and supplementary settlement payments to two more, reinstatement of three workers, and written commitments from Atento to Mexico's Labour Secretariat to reinstate one worker and provide settlement payments to two others.

The U.S. contended that these actions did not fully remediate the Denial of Rights: "these steps have neither brought all unlawfully dismissed workers back to work with full benefits, nor have they created actual, on-the-ground conditions in which workers can engage in organizing activities without fear of reprisal" (United States of America, 2024a: 35). While the STRM could attempt to seek titularity of the new CBA under Mexican law in another election, the U.S. warned that "doing so would be futile under the conditions that persist at the facility" (United States of America, 2024a: 35).

Mexico also made a jurisdictional claim. On the one hand, Mexico argued the RRLM was not intended to make determinations regarding the actions of national authorities—in this case, Mexico's remediation efforts. On the other hand, Mexico argued that Atento was not a Covered Facility. Citing the case of the San Martín Mine dispute, in which the RRLM Panel found in agreement with Mexico, it contended the Pachuca worksites provided domestic services—Atento's principal client in Pachuca was the BBVA México, the local subsidiary of a Spanish bank—and thus did not fall under the USMCA.

The U.S. countered that a determination of sufficient remediation was indeed within RRLM's purview. Regarding the Covered Facility claim, the U.S. contended that the traded service did not need to originate in the facility in question, but rather that the good or service must be traded between the two Parties, noting that "Atento, in its Mexico City location, employs 10,000 workers that provide U.S. clients call centre services, including customer service, technical support, revenue generation, and back-office functions; the U.S. clients include Walmart, American Express, HSBC, and GE" (United States of America, 2024a: 14). The U.S. further stated that

As Atento acknowledges in its filings with the SEC, its clients contract with providers like Atento 'largely to take advantage of lower labour costs, specialist knowledge and cost efficiencies'. Labour costs that are suppressed because of illegal labour conditions at Atento, which competes with other CRM service providers in Mexico, can drive down wages and other working conditions in the North American call centre sector generally" (United States of America, 2024a: 15).

The U.S. argued that all call centres in Mexico that supply services to the U.S. are Covered Facilities under the first clause of the treaty's definition, as discussed above, and that Atento also supplies services that compete with those provided by U.S. firms, be they from Mexico-based affiliates or U.S.-based facilities, thus satisfying the definition's second clause.

In its August 2024 reply submission, the U.S. argued that "to the extent that STRM supporters are no longer present at the facility, the ability of STRM to gain any right to representation in the future also continues to be hampered," while noting that "Atento continues to interfere in union activities, demonstrating that Atento continues to actively deny workers their right to freedom of association and collective bargaining" (United States of America, 2024a: 34). Nor did Mexico sanction Atento for its unlawful behaviour. Workers alleged the company infiltrated the STRM WhatsApp group, monitored employees' social media, and conducted video surveillance of STRM activities, all of which was used to dismiss workers. The company convened an electronic vote to form a worker committee

on its intranet and selected the candidates. Atento furthermore granted Benito Juárez union representatives access to the facilities but denied the STRM. Management threatened workers that the company would lose accounts and close if the STRM won the collective representation vote, and promised increased benefits should the Benito Juárez union prevail: “Atento waged a year-long systematic campaign of dismissals, threats, and other acts to coerce worker support for [the Benito Juárez union], Atento’s favoured union” (United States of America, 2024a: 30).

Mexico, for its part, cited the CFCRL’s determination that the STRM’s claims of irregularities in the vote were without merit. Atento and the “Benito Juárez” union also underscored this decision in their submissions. The U.S. pointed to a lack of investigation of worker claims filed with the CFCRL before the vote: “Troublingly, Mexico’s findings regarding interference in its Report to the United States, which preceded the December 2023 representation vote, do not appear to have been communicated to the Federal Centre or otherwise to have informed the determination by Mexican authorities of whether the election results should be set aside” (United States of America, 2024b: 4). In its November Rebuttal Statement, the U.S. warned that, “Since the establishment of this Panel, in the run up to the August 9, 2024, vote on the new CBA negotiated between Atento and [the Benito Juárez union], Atento again threatened and coerced workers, and again succeeded in preventing workers from freely exercising their rights to freedom of association and collective bargaining” (United States of America, 2024a: 44).

The Panel’s August 2025 determination found in the U.S.’s favour. The Panel dismissed Mexico’s jurisdictional objections and confirmed that Atento’s Pachuca locations were Covered Facilities under the treaty definition’s second clause (31-A.15(ii)), also determining that the Panel “has jurisdiction to decide whether a Denial of Rights has occurred and whether it has been remedied” (2025: 132). It concluded that “Atento caused a Denial of the Rights to freedom of association and collective bargaining, in accordance with the laws necessary to comply with the Respondent’s obligations under the USMCA and that this denial has not been sufficiently remediated” (Rapid Response Labor Panel, 2025: 6). The Panel identified a “consistent practice of wrongful employer interference, control, and domination of the workers’ union organization” (2025: 123-124). The Panel further found that the remediation undertaken by Mexico was insufficient, “did not change the labor climate” (2025: 129) and was “inadequate in counteracting the effects of the arbitrary dismissals and the company’s interference with the workers” (2025: 130).

A Provisional Balance

Observers largely agree that a transition is afoot in Mexico’s labour governance regime, but evaluations of the scope and efficacy of its mechanisms vary. Covarrubias Valdenegro observes that the transformations in national and transnational labour frameworks have initiated a long transition in Mexico’s “labour and industrial relations regime” (2023:28). Nevertheless, he found the process top-heavy, with excessive “politics and arrangements from above, and scarce [participation from] civil society and labour movements from below.” As for the RRLM, Alcalde (2023) considers the mechanism struck at the heart of the prevailing “model of labour control,” generating deep concern from employers who found their networks of government influence severed upon AMLO’s 2018 presidential victory and who nevertheless stood to benefit from the USMCA’s support for Mexican manufacturing exports. For Polaski, however, “Mexican workers’ perceived need to turn to the RRLM for enforcement of their rights is one indication of the lack of effective and timely remedies for denials

of rights” (2023: 19). Others point to the structural asymmetries of the mechanism’s design. Santos warns that the unequal nature of the RRLM is a “defect” that “belies a fundamental principle of reciprocity and the notion of fair partnership” (2023: 36). The mechanism needs to be applied regionally, he insists, especially in sectors like U.S. agriculture, where labour violations are rampant (2023: 37).

The high levels of capacity required to present a petition was another concern, with US-funded non-profits or large U.S. labour federations typically mediating for Mexican labour unions. In its March 2023 report, the Independent Mexico Labour Expert Board warned that “each of the cases accepted so far has required hundreds of hours of work by Mexican labour activists, their legal advisors, and U.S. trade union and NGO supporters, as well as Labour Attaches and other U.S. government personnel” (2023: 46). These demands and inequities, together with reliance on U.S. funding for implementation—\$180 million over four years—raise important questions about sustainability in the long term, especially in the wake of USAID’s elimination under the second Trump administration (2025-2029).

The Board found that “the availability of the RRLM did provide Mexican workers with an additional avenue to challenge violations of their rights and the U.S. and Mexican governments demonstrated the political will to use the new mechanism in a spirit of cooperation and on a rapid timeline” (2023: 45). Nevertheless, it concluded: “While the initial cases offer some hope, the unfortunate truth is that little has changed in the overwhelming majority of Mexican workplaces, including key manufacturing industries in critical supply chains. There is little indication that workers feel empowered by the new legislation or are even aware of it” (Independent Mexico Labour Expert Board, 2023: 47).

A survey of RRLM cases at the time of writing reveals ambivalent, if largely positive, results. As of August 2025, the U.S. had filed requests for review under the RRLM over violations at 37 facilities, all of them in Mexico (USTR, 2025); Canada also filed a request against a Mexican facility. Most requests were prompted by petitions from Mexican and U.S. labour groups, often regarding irregularities in CBA legitimization votes. 23 (62.2%) of the targeted facilities were related to the automotive industry; the rest included four industrial input facilities, three mines, an electronics manufacturer, a textile plant, a food production site, a munitions factory, a cement plant, a glass manufacturer, a freight airline, and one call centre: Atento. Of these claims, 23 (62.2%) were resolved through remediation agreements. Another two closed after both governments considered successful outcomes had been reached without a remediation plan. Five remained pending Mexico’s review process. In at least two cases, auto parts facilities VU Manufacturing and Unique Fabricating, employers shuttered operations rather than comply with remediation agreements (Maquila Solidarity Network, 2023).

On seven occasions that consensus was not achieved, the U.S. requested to convene a Panel. The facilities involved included two mines (San Martin and Camino Rojo); three auto parts plants (Yazaki, Pirelli, and Bader); the Industria Tecnos munitions factory, and the Atento call centres. At the time of writing, only the Yazaki and San Martin cases had been resolved: in the case of Yazaki, the U.S. agreed to close the case before the Panel’s constitution upon reaching resolution with the employer and Mexico; in the case of San Martin, the Panel found against the U.S. in May 2024, siding with Mexico to declare the case outside the RRLM’s jurisdiction. In the Atento case, the Panel sided with the U.S., embracing a contrary, more capacious jurisdictional interpretation. The other five Panels had yet to reach a decision.

At Atento, the STRM's November 2022 CBA rejection was a short-lived victory, reversed by successive defeats in the December 2023 representation vote and August 2024 CBA approval. Domestic recourse proved fruitless, with the CFCRL siding with the employer and the protection union to legitimise the subsequent elections despite widespread interference, even reversing a decision to suspend the "Benito Juárez" union's collective representation license pending the RRLM results. Troublingly, the Panel determination (2025, p. 88) reveals that the CFCRL's decision was based mainly on the high voter turnout and wide margin of victory in the elections, which it considered evidence that employer intervention was not sufficient to sway the outcomes. Evidence of employer interference was therefore not duly investigated. This conservative, restrictive approach was also reflected in Mexico's efforts to enforce a narrower RRLM jurisdiction, suggesting more continuity than rupture with the previous regime.

The RRLM, for its part, proved anything but rapid, with the Panel process dragging out for well over a year. Initial remedies negotiated during Mexico's review process provided an acknowledgement of presumptive rights violations and partial compensation to impacted workers, but they did not result in the reinstatement of all wrongfully dismissed union organisers and sympathisers, nor did they provide for new elections under impartial conditions. Instead, the company faced no sanctions and proceeded to violate union freedom in Pachuca with impunity, securing a new protection union in the process. Testimony presented in the Panel verification process showed that workers reinstated as part of Mexico's remediation faced ongoing management harassment and intimidation, while workers whom Atento had refused to reinstate reported difficulty finding work in the sector due to blacklisting. At the time of writing, the U.S. had yet to announce remediation measures in response to the Panel's determination. It remained to be seen whether Mexico would accept, and how long and what form this process would take.

Elsewhere, Atento's other protection union retained its monopoly. The "Progreso y Trabajo" union successfully defended five contract legitimization votes across nine Atento worksites in Mexico City, four in the State of Mexico and one in Monterrey (CFCRL, 2025a). As a result, and despite the opportunities afforded by the emergent labour governance regime, in 2025, Atento workers in Mexico found themselves back where they started in 2018: under employer protection contracts and without authentic collective representation.

Atento, in the meantime, had entered a significant period of crisis. From US\$213.7 million in 2016, Atento's earnings stood at \$145 million in 2021. Atento stock prices nosedived in May 2022, and in June 2023, the company initiated a radical debt restructuring process (Cantu, 2023). In July, the company was delisted from the New York Stock Exchange after its stock price reached historic lows. In October, Fitch again downgraded the company to its second-lowest tier, citing the debt restructuring, a missed August interest payment, low, single-digit revenue growth, and industry overcapacity (Fitch Ratings, 2023). Whatever the outcome of the RRLM Panel's determination and future independent organising, the risk of significant downsizing or even closures at Atento appeared substantial, potentially jeopardising gains for labour.

Conclusion

Transformations in Mexico's labour governance occur amid deeper shifts in the prevailing accumulation regime unfolding since the global financial crisis of 2008 initiated a prolonged period of instability and recession from which the world economy has yet to recover. Together with the USMCA

negotiation, processes of productive relocation evident in the *nearsourcing* trend, and renewed national industrial policy, these developments indicate an exhaustion of neo-liberalism even as the characteristics of the present regime have yet to stabilise sufficiently to define its successor. The emerging labour governance regime, which includes Mexico's labour reforms, wage raises, and welfare programs, affords a new, more robust role for the state in fostering more favourable conditions for workers both inside and outside the workplace. The initiated transition, however partial, away from the employer protection labour governance regime that prevailed under neo-liberalism is the result of complex exogenous and endogenous factors, yet such a transition is only thinkable in the context of this crisis.

Nevertheless, its ambivalent results for Atento workers suggest this transition is far from complete. Far more needs to be done at the national and transnational scale to enable workers' exercise of collective representation and bargaining rights and ensure timely remedies. My reconstruction of the STRM campaign finds that openings provided by the 2019 Labour Reform were insufficient to counter the enduring collusion between employers and protection unions in the flexibilised outsourced service sector in Mexico. Indeed, effective remedies were undermined by the very institutions erected by the reform—in this case, the CFCRL, which neglected to pursue evidence of labour violations and later reversed its commitment to suspend the “Benito Juárez” union's collective representation certificate until the RRLM process was finalised.

As for the RRLM, it remains to be seen whether the Panel's determination will prompt measures to restore union freedom and labour rights at Atento, so many months after the STRM leadership and key supporters were fired in a sector already characterised by high turnover. More broadly, it's notable that, while typically the instigator for activating the mechanism, labour is essentially excluded from the ensuing conflict resolution process. Instead, remediation is brokered between governments and the employer. My analysis of the Atento case reveals the STRM at a disadvantage, relegated to the role of petitioner and “non-governmental entity” and, as such, a secondary actor in shaping the negotiations' outcome. As a result, the process's success depends largely on the good faith of the Parties—a condition that, given the unstable political climate, cannot be taken for granted. Under the second Trump administration (2024-2029), uncertainty prevails ahead of the upcoming 2026 USCMA review. Mexico, meanwhile, shows reluctance to accept a more expansive interpretation of RRLM jurisdiction. If a regime of labour governance is the result of the prevailing balance of geopolitical and class forces at a given historical moment, it will be up to organised labour to tip that balance in workers' favour to advance a more democratic labour agenda, in Mexico and beyond.

References

- Alcalde, A. (2023). Notas sobre el mecanismo laboral de respuesta rápida del TEMEC. In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales del T-MEC* (pp. 23-26). Ciudad de México: El Colegio de México.
- Anner, M. (2015). Worker resistance in global supply chains. Wildcat strikes, international accords and transnational campaigns. *International Journal of Labour Research*, 7(1-2), 17-34.
- Appelbaum, R. P. (2016). From Public Regulation to Private Enforcement. How CSR Became Managerial Orthodoxy. In R. P. Appelbaum, & N. Lichtenstein, *Achieving Workers' Rights in the Global Economy* (pp. 32-50). Ithaca: Cornell University Press.

- Baglioni, E., Campling, L., Coe, N. M., & Smith, A. (2022). Introduction: labour regimes and global production. In E. Baglioni, L. Campling, N. M. Coe, & A. Smith (Eds.), *Labour Regimes and Global Production* (pp. 1-28). Newcastle: Agenda Publishing.
- Becker, C. C., & Calderón, A. P. (2022). Gobernanza laboral: viejos-nuevos paradigmas y modelos en las relaciones laborales. *Estudios Políticos*(57), 147-179.
- Bensusán, G. (2007). Los determinantes institucionales de los contratos de protección. In J. A. Bouzas Ortíz, *Contratación colectiva de protección en México. Informa a la Organización Regional Interamericana de Trabajadores* (pp. 11-48). Ciudad de México: Universidad Nacional Autónoma de México, Instituto de Investigaciones Económicas .
- (2020). The Transformation of the Mexican Labour Regulation Model and its link to North American Economic Integration. ILO Working Paper 15, 1-31.
- (2023). A cuatro años del cambio institucional en el mundo del trabajo: balance y perspectivas. In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales y el T-MEC* (pp. 10-15). Ciudad de México: El Colegio de México.
- Braverman, H. (1998). *Labor and Monopoly Capital. The Degradation of Work in the Twentieth Century*. New York: Monthly Review Press.
- Cantu, C. (2023, September 7). Breakdown: Heavy Debt Pushes Atento to New Lows. *Nearshore Americas*: <https://nearshoreamericas.com/breakdown-heavy-debt-pushes-atento-to-new-lows/>
- CFCRL (Centro Federal de Conciliación y Registro Laboral). (2025a). *Contratos Colectivos de Trabajo (CCT)*. Gobierno de México: <https://centrolaboral.gob.mx/listado-cct-legitimados/>
- (2025b). *Contrato: CFCRL-CONTRATO-HID-2024-12398*. Repositorio de Información del Registro Laboral: <https://repositorio.centrolaboral.gob.mx/contrato/625320>
- Comité de Libertad Sindical. (2013). 368.º informe del Comité de Libertad Sindical. Oficina Internacional del Trabajo (OIT). Ginebra: Organización Internacional del Trabajo.
- Covarrubias Valdenegro, A. (2023). La transición laboral mexicana. ¿En qué etapa vamos? In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales del T-MEC* (pp. 27-30). El Colegio de México: Ciudad de México.
- Cypher, J. M., & Crossa, M. (2021). Reestructuración laboral en México frente al T-MEC. *Análisis*, 14(39), 73-99.
- Delgado Wise, R., & Márquez Covarrubias, H. (2007). Teoría y práctica de la relación dialéctica entre desarrollo y migración. *Migración y Desarrollo*(9), 5-25.
- Fitch Ratings. (2023, October 9). Fitch Downgrades Atento Luxco's IDR to 'RD'. Fitch Ratings: <https://www.fitchratings.com/research/corporate-finance/fitch-downgrades-atento-luxco-idr-tord-09-10-2023>
- Foust-Rodríguez, D., & Román-Morales, L. I. (2024). Transformación del sistema mexicano de relaciones industriales con la reforma laboral de 2019. *Espiral*, 31(91), 159-203.
- Harvey, D. (1998). *La condición de la posmodernidad. Investigación sobre los orígenes del cambio cultural* (M. Eguía, Trans.) Buenos Aires: Amorrortu Editores.
- Independent Mexico Labor Expert Board. (2023, marzo 20). *REPORT INDEPENDENT MEXICO LABOR EXPERT BOARD*. <https://www.worldtradelaw.net/document.php?id=usmca/IMLEBReport20230320FINAL.pdf&mode=download>
- Jessop, B. (2013). Revisiting the regulation approach: Critical reflections on the contradictions, dilemmas, fixes, and crisis dynamics of growth regimes. *Capital & Class*, 37(1), 5-24.

- Jessop, B., & Sum, N.-L. (2006). *Beyond the Regulation Approach. Putting Capitalist Economies in Their Place*. Northampton: Edward Elgar Publishing Limited.
- Jonas, A. E. (1996). Local Labour Control Regimes: Uneven Development and the Social Regulation of Production. *Regional Studies*, 30(4), 323-338.
- Leclercq, D. (2023). The One-Directional Nature of T-MEC Labor Enforcement: A Case for Revising Annex-31-A. In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales del T-MEC* (pp. 46-50). Ciudad de México: El Colegio de México.
- Maquila Solidarity Network. (2023, December 3). What have rapid response labour complaints achieved for Mexican workers? Maquila Solidarity Network: <https://www.maquilasolidarity.org/en/what-have-rapid-response-labour-mechanism-complaints-achieved>
- Martínez Silva, E., & Ocampo Pérez, E. S. (2024). Conflictos en la implementación de la reforma laboral mexicana de 2019 en la industria automotriz. *Sociología Del Trabajo*(105), <https://doi-org.pbidi.unam.mx:2443/10.5209/stra.97255>.
- Ocampo Merlo, R. E. (2022). La reforma laboral mexicana en marcha: el caso de General Motors-Silao. *Tendencias*, 23(1), 1–28.
- Polaski, S. (2023). Mexican Labor Rights within the framework of the USMCA: Advancing Inclusive Development and Convergence of Living Standards. In G. Vega Cánovas, & J. Brasaluce Iza, *Derechos* (pp. 16-22). Ciudad de México: El Colegio de México.
- RAPID RESPONSE LABOR PANEL ON THE ATENTO SERVICIOS CASE (MEX-USA-2024-31A-01). (2025, July 4). PANEL'S FINAL DETERMINATION. <https://ustr.gov/sites/default/files/files/Press/Releases/2025/AtentoServiciosUSMCARRMPanelDeterminationProvisionalEngTranslation.pdf>
- Santos, Á. (2023). The USMCA Labor Bargain: Implementation, Reciprocity and the Challenges Ahead. In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales del T-MEC* (pp. 31-37). Ciudad de México: El Colegio de México.
- Scherrer, C. (2020). Novel Labour-related Clauses in a Trade Agreement: From NAFTA to USMCA. *Global Labour Journal*, 11(3), 291-306.
- Secretaría de Economía. (2024, March 27). México concluye exitosamente la investigación interna de la solicitud de revisión en Atento Servicios conforme al Mecanismo Laboral de Respuesta Rápida del T-MEC. Gobierno de México: <https://www.gob.mx/se/prensa/mexico-concluye-exitosamente-la-investigacion-interna-de-la-solicitud-de-revision-en-atento-servicios-conforme-al?idiom=es>
- Secretaría de Economía; Secretaría del Trabajo y Previsión Social. (2024, enero 30). México admite solicitud de revisión presentada por Estados UNidos al amparo del Mecanismo Laboral de Respuesta Rápida sobre derechos colectivos en la empresa Atento Servicios. Twitter: https://twitter.com/SE_mx/status/1752371187202572622/photo/1
- Silverman, J. (2007). *Telefónica en América Latina. Una migrata comparativa*. Medellín: Escuela Nacional Sindical. <https://www.ens.org.co/wp-content/uploads/2017/08/Documentos-68.pdf>
- USTR (Office of the United States Trade Representative). (2024a, enero 19). United States Seeks Mexico's Review of Alleged Denial of Workers' Rights at Atento Servicios, S.A. de C.V. Press Office: <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2024/january/united-states-seeks-mexicos-review-alleged-denial-workers-rights-atento-servicios-sa-de-cv>
- (2024b, 16 abril). United States Requests Second Ever USMCA Rapid Response Labor Mechanism Dispute Settlement Panel. Press Releases: <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2024/april/united-states-requests-second-ever-usmca-rapid-response-labor-mechanism-dispute-settlement-panel>

- (2025). Chapter 31 Annex A; Facility-Specific Rapid-Response Labor Mechanism. USTR <https://ustr.gov/trade-topics/enforcement/dispute-settlement-proceedings/fta-dispute-settlement/usmca/chapter-31-annex-facility-specific-rapid-response-labor-mechanism>
- United States of America. (2024a, August 30). Reply Submission of the United States of America. UNITED STATES – ATENTO SERVICIOS, S.A. DE C.V. (MEX-USA-31A-01): <https://ustr.gov/sites/default/files/USAAatentoVersionPublicaENG.pdf>
- (2024b, November 25). Rebuttal Submission of the United States of America. UNITED STATES – ATENTO SERVICIOS, S.A. DE C.V. (MEX-USA-2024-31A-01): <https://ustr.gov/sites/default/files/2024.11.25%20-%20Atento%20-%20US%20Rebuttal%20timestamped.pdf>
- USMCA (US-Mexico-Canada Agreement) (2018). United States-Mexico-Canada Agreement.
- Vargas Escobar, E. (2016). La campaña de organización del call center atento en la Ciudad de México (2008 - 2015). Tesis de licenciatura. Ciudad de México: Universidad Nacional Autónoma de México (UNAM).
- Vega Cánovas, G., & Berasaluce Iza, J. (2023). Conclusiones del seminario "Derechos laborales y el TMEC". In G. Vega Cánovas, & J. Berasaluce Iza, *Derechos laborales del T-MEC* (pp. 57-68). Ciudad de México: El Colegio de México.
- Xelhuantzi López, M. (2007). ¿Qué es un contrato de protección? In J. A. Bouzas Ortiz, *Contratación Colectiva de Protección en México. Informe a la Organización Regional Interamericana de Trabajadores (ORIT)* (pp. 97-120). Ciudad de México: Universidad Nacional Autónoma de México, Instituto de Investigaciones Económicas.

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