



Initial Assessment Wakker Dier vs. VION

Date: 7 January 2026

The objective of the initial assessment process under the Implementation Procedures is to determine whether the issues raised in the specific instance warrant further examination. If so, the NCP will offer or facilitate access to consensual and non-adversarial procedures, such as dialogue, mediation or conciliation (e.g. ‘good offices’) to the relevant parties. As specific instances are not legal cases and NCPs are not judicial bodies, NCPs cannot impose sanctions, directly provide compensation nor compel parties to participate in a conciliation or mediation process.

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Executive summary

On 21 July 2025, the Dutch National Contact Point (NCP) for Responsible Business Conduct received a notification of a specific instance from Stichting Wakker Dier (hereinafter the notifying party) with regard to an alleged violation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereinafter the Guidelines) by Vion Food Group N.V. (Vion). Vion is a Dutch-based international producer of meat, meat products and plant based alternatives.

According to the notifying party, Vion has repeatedly breached the Guidelines. The notifying party alleges Vion has failed to address adverse effects on pig welfare, both as a result of its own activities as well as within its pork supply chain. The issues raised in the submission concern an alleged violation by Vion of the Guidelines' Chapters on General Policies (Chapter II), Disclosure (Chapter III), and Environment (Chapter VI).

Brief overview of the timeline

On 22 September 2025 the NCP had a first meeting with the notifying party and on 25 September with Vion. The NCP received an initial written response from Vion on 21 October. The NCP shared the draft Initial Assessment with the parties on 25 November for comments within two weeks. The Initial Assessment was published on the NCP website on 7 January 2026.

Conclusion

The NCP concludes that the notification concerning Vion **warrants further examination** based on the following criteria:

- the identity of the party concerned and its interest in the matter;
- whether the issue is material and substantiated;
- whether the enterprise is covered by the Guidelines;
- whether there seems to be a link between the enterprise's activities and the issue raised in the specific instance;
- the extent to which applicable law and/or parallel proceedings limit the NCP's ability to contribute to the resolution of the issue and/or the implementation of the Guidelines;
- whether the examination of the issue would contribute to the purposes and effectiveness of the Guidelines.

Below it is explained why, in the NCP's opinion, these criteria have been met.

This decision does not mean that the issues raised have been given final consideration nor does it imply any finding as to whether or not the enterprise has acted in accordance with the Guidelines.

Substance of the submission (facts presented) and the enterprise's response

Summary of the submission

According to the notifying party, the enterprise has structurally violated animal welfare standards as set out in the Guidelines. First, the notifying party argued that pigs faced stress, fighting and injuries caused by Vion's standard practice of mixing pigs from different social groups during transport and prior to loading. Vion is being alleged of contributing to this practice of mixing not only through its own practice, but also by setting delivery conditions to its suppliers in such way that mixing is inevitable in practice. Second, the notifying party alleged the enterprise has failed to organize sufficient space per animal during transport and at slaughterhouses resulting in overcrowded conditions. Third, Vion's suppliers of animal products are being presumed of maintaining too high levels of ammonia in pigsties, leading to respiratory diseases.

Wakker Dier alleged the enterprise has failed to address the above-mentioned adverse effects on pigs' welfare both in its own activities as well as within its pork supply chain by setting supply conditions on e.g. delivery of pigs and loading capacity. Also, Vion would have neglected to take responsibility in supply chain management, thereby not using its leverage on supply chain partners to mitigate the adverse impacts of activities on pigs' welfare.

The complaint also concerned the enterprise's due diligence process and transparency on this process. According to the notifying party, Vion has neglected to identify, assess and mitigate both actual and potential adverse impacts related to animal welfare, as a core part of its risk-based due diligence process. Moreover, the notifying party argued that Vion has not been transparent in its communication with stakeholders about how it has addressed negative impacts on animal welfare. Vion states on its website that it wants to pioneer in discussions on animal welfare and has a responsibility in this in its entire supply chain. The notifying party claimed that this statement cannot be verified by any information provided by Vion on its website, nor after requests made by the notifying party.

The notifying party argued that the violations of the Guidelines are pervasive in Vion's operations and have continued despite communications from Wakker Dier, informing the enterprise of these violations. The notifying party alleged that Vion violated in particular the following elements of the Guidelines:

- Chapter II (General Policies), specifically articles 11, 12, 13 and 14.
- Chapter III (Disclosure), specifically articles 1, 2, 3 and 4.

- Chapter VI (Environment), specifically articles 1, 2, 3, 4, 5, 6 and 7

The notifying party asked Vion to adopt measures to mitigate the described pigs' welfare issues, which should include:

- adhering to OECD standards and to the Terrestrial Code (as referred to in the Guidelines);
- refraining of imposing transport and slaughter conditions that negatively impact animal welfare;
- actively establishing new delivery conditions that minimize negative impacts on the issues as described in this complaint;
- engaging with supply chain partners to prevent or limit the adverse effects on animal welfare and to promote compliance with the Terrestrial Code;
- developing a systematic approach that truly prioritizes animal welfare, by assessing adverse impacts in their operations, supply chains and business relationships, and searching for targeted solutions.

Enterprise's response

The enterprise's written response to the specific instance is summarised below.

According to Vion, the control of Vion's pork supply chain not only adhered to the legal framework, but also to public private schemes that concern animal welfare. With regard to legal frameworks, Vion pointed at EU and Dutch legislation that control the Dutch supply chain of porks, being based on science as well as the Terrestrial Code. Vion has been subject to public enforcement carried out by the NVWA. All slaughter pigs were being checked by an official veterinarian of the authorities. Additionally, Vion's facilities were, at least once per year, certified by Dutch authorities. Pork producers within the Netherlands are said to adhere to the industry quality standard (IKB). All farmers that supply to Vion were certified to this IKB scheme.

Vion further stated that it is (pro-)actively involved in public and private standards, such as the Dutch Animal Welfare Council (*Raad voor Dierenaangelegenheden*). Another example is the "*Beter Leven Standard*" (BLK) for pork, which Vion said to have co-developed, together with the Dutch Charity of Animal Welfare (*Dierenbescherming*), pig farmers and a retailer. This BLK standard has been implemented in the whole pork supply chain that is producing for Dutch retail and other customers who have accepted this elevated welfare standard for pork. In addition, Vion underlined that it is the largest organic pork producer of the Netherlands that is certified according to EU organic legislation. The volume of pigs slaughtered under the BLK and organic standard within Vion's pork slaughterhouses in the Netherlands exceeds 30%. Further to that, Vion stressed that several of their suppliers have set standards concerning animal welfare; standards that are going beyond EU legislation and are based on science, thereby following due-diligence procedures in the supply chain. Lastly, Vion has been active in

steering the scientific Dutch agenda to improve animal welfare in the pork supply chain (COVIVA), together with pig farmers, relevant NGO's and academia.

Additionally, Vion emphasized that it has developed its own welfare standard, which it has enforced in its supply chain in three ways. First, since three years Vion has undertaken a voluntary certification by a registered accountant who works according to EU CSRD rules. Second, accredited annual auditing procedures have taken place in the whole supply chain, both announced and unannounced. Third, Vion stated to have added a weekly reporting system in order to track all relevant issues within its premises, making use of an advanced system of Artificial Intelligence for Animals. Vion specified that all supplying farmers have received relevant animal welfare information within a few days after slaughter. The systems allowed farmers to get deep insights of their potential to improve animal health and welfare and also to benchmark themselves against their peers.

Vion provided the following statements and conclusions:

1. Vion is active in the Dutch pork supply chain according to rules based on the Terrestrial Code of WOH and the relevant guidelines of FAO.
2. Vion has implemented due diligence that also includes animal welfare next to other relevant themes. This is already evaluated on an annual basis by its official auditor.
3. Vion is actively involved in improving animal welfare along the pork supply chains and regularly implements new innovative standards that go far beyond the current industry standards.
4. Vion works closely together with several animal welfare charities that are open for a meaningful dialogue. This results in several structural and meaningful improvements of animal welfare. Wakker Dier did not participate in these dialogues and has not showed any intention to do so.

Proceedings of the NCP to date

Since the receipt of the submission on 21 July 2025, the following steps were taken:

- On 29 July, the NCP sent a confirmation of receipt to the notifying party and informed the enterprise of the notification. Both parties also received a description of the NCP procedure.
- On 22 September 2025, the NCP held its first meeting with the notifying party.
- On 25 September 2025, the NCP had a first meeting with the enterprise.
- On 21 October 2025, the NCP received the initial written response to the notification from Vion.

- On 25 November 2025, the NCP sent the draft Initial Assessment to both parties for comments within 2 weeks.
- On 7 January 2026, the NCP published the Initial Assessment.

Initial assessment by the NCP

The NCP has decided to accept the submission. This decision has been taken following an assessment by the NCP as to whether the issues raised warrant further examination. For this decision, the NCP took into account the following six criteria:

The identity of the party concerned and its interest in the matter

The specific instance is submitted by the Wakker Dier Foundation. Wakker Dier aims to improve the welfare of animals in livestock farming in the Netherlands since 1997. Wakker Dier does this primarily through campaigns targeting companies, public pressure, consumer education, and legal proceedings.

It is standing practice that NCPs will accept submissions filed by trade unions, NGOs or other organisations that seek to address causes they defend. As the notifying party is an organisation defending causes that relate to the issues raised, the NCP is of the opinion that the notifying party has a legitimate interest in the issues raised in this submission.

Whether the issues raised are material and substantiated

In line with the Commentary to the Procedural Guidance for NCPs, paragraph 33, the NCP interprets ‘material and substantiated’ to mean that, based on the information submitted, the issues raised are relevant to the implementation of the Guidelines and supported by sufficient and credible information.

The submission is material in the sense that it refers to the alleged non-observance of provisions of Chapter II (General Policies), Chapter III (Disclosure) and Chapter VI (Environment).

The issues raised by the notifying party are sufficiently substantiated by background information, including by scientific studies and expert opinions.

Whether the enterprise is covered by the Guidelines

Vion is a privately held multinational enterprise. Vion has its headquarters in the Netherlands, which is an OECD Member State. The enterprise has a commercial purpose and international operations. Vion is hence a multinational enterprise in the sense of the Guidelines and thus covered by the Guidelines.

Whether there seems to be a link between the enterprise's activities and the issues raised in the specific instance

According to the notifying party, Vion has failed to exercise due diligence, and address and take remedial action after being informed of violations of animal welfare standards in its operations. The notifying party argues that the violations of the Guidelines are pervasive in Vion's operations and have continued despite communications from concerned parties.

The NCP therefore concludes there is a link between Vion, its operations and the alleged violations of the OECD Guidelines.

The extent to which applicable law and/or parallel proceedings limit the NCP's ability to contribute to the resolution of the issue and/or the implementation of the Guidelines

A related domestic proceeding at the Netherlands Food and Consumer Product Safety Authority (NVWA) concerning mixing pigs of different social groups at three different slaughterhouses (amongst them Vion) was finalized on March 20, 2023. Starting August 15, 2024, the NVWA began a new enforcement policy that prohibited mixing pigs from different social groups at slaughterhouses, considering it a violation that causes stress and pain.

As the European Regulation 1099/2009 only applies to the protection of animals *at slaughterhouses*, and not to mixing different groups of pigs *during transport* (being one of the issues in this complaint), the alleged violations of the Guidelines go beyond the demarcated subject of the NVWA proceedings.

As noted in the Commentary to the Procedural Guidance for NCPs, paragraph 35, already concluded or ongoing domestic or international parallel proceedings do not necessarily prevent an NCP from handling the specific instance by offering its good offices to the parties.

Concerning applicable law, it is relevant to note that the Guidelines, in which reference is made to the WOAHA Terrestrial Animal Health Code, go beyond Dutch and European law. Chapter 1, paragraph 2 of the OECD Guidelines states that: "*in countries where domestic laws and regulations conflict with the principles and standards of the Guidelines, enterprises should seek ways to honour such principles and standards to the fullest extent which does not place them in violation of domestic law.*" This specific instance concerns alleged violations of principles and standards of the Guidelines. There is no obstacle for Vion to adhere to the Guidelines, as it would not place the company in violation of Dutch law.

Whether the examination of the issue would contribute to the purposes and effectiveness of the Guidelines

The Dutch NCP believes that dealing with this notification may contribute to achieving the Guidelines' objectives and enhancing their effectiveness in the sense that it could help clarify the responsibilities under the OECD Guidelines concerning animal welfare.

Conclusion

The NCP is of the opinion that this submission **warrants further examination** on the basis of the criteria laid out in the commentary to the Procedural Guidance, paragraph 33. The conclusion reached by the NCP in this initial assessment is based on the information received from both parties. The NCP does not express an opinion on the correctness of the statements of the parties or the validity of the documentation provided by them.

Next steps

In accordance with the Dutch NCP Specific Instance Procedure, the NCP **accepts** this case for further examination and offers its good offices to the parties. The NCP will ask both parties whether they are willing to engage in a mediation/conciliation process, with the aim of agreeing how the issues raised can be successfully addressed.

In accordance with the NCP procedure, further activities relating to the specific instance procedure will be confidential while good offices are ongoing. The NCP will, together with the parties, take the necessary steps to guarantee a careful and confidential process.

If the parties cannot reach an agreement as a result of the good offices, the NCP will, in principle, examine the issues and provide recommendations concerning the observance of the Guidelines. In any case, it will complete the procedure by issuing a Final Statement, which it will publish on its website.

The role of National Contact Points (NCPs) is to further the effectiveness of the OECD Guidelines. The Dutch government has chosen to establish an independent NCP, which is responsible for its own procedures and decisions, in accordance with the Procedural Guidance section of the Guidelines. In line with this, the Dutch NCP consists of four independent members, supported by four advisory government officials from the most relevant ministries. The NCP Secretariat is hosted by the Ministry of Foreign Affairs. The Minister for Foreign Trade and Development Cooperation is politically responsible for the functioning of the Dutch NCP. More information on the OECD Guidelines and the NCP can be found on the [NCP Website](#)

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