

# 2026 Work Plan NCP

## Foreword

In 2026, the OECD Guidelines will celebrate their 50th anniversary, and the National Contact Point for the OECD Guidelines will celebrate its 25th. These guidelines are the global standard for responsible business conduct (RBC); doing business with respect for human rights, labour rights, labour relations, consumer rights, and the environment. The NCP plays a central role in promoting the application of these guidelines by handling Specific Instances, providing information, and encouraging coherence within government policy on RBC.

The work plan of the Dutch NCP for 2026 focuses on strengthening the effectiveness of the NCP, in a year in which significant changes are taking place both internally and externally. Institutionally, the composition of the NCP is changing, with the start of a new NCP member, a new chairperson, and the start of an advisory member from the Ministry of Agriculture, Fisheries, Food Security and Nature (LVVN). Furthermore, we aim to shorten processing times for Specific Instances without compromising the diligence and quality of our procedures.

In addition, the Dutch NCP underwent a OECD Peer Review in 2025. The purpose of this Peer Review is to evaluate strengths and weaknesses and to make recommendations for improvement. The recommendations from the Peer Review report will guide the further improvement of our working methods. A report on this will be submitted to the OECD at the beginning of 2027. Finally, as every year, we actively contribute to the international network of NCPs.

With this work programme, we wish and need to fulfil our tasks and ambitions. We can only do this with the support and cooperation of all relevant stakeholders: government, business, trade unions and civil society organisations.

Rutger Goethart, Chair NCP

March 2026

# 1. The role of the NCP and the OECD Guidelines

## 1.1 Purpose of the OECD Guidelines

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereinafter: OECD Guidelines) clarify what the government expects from companies in terms of responsible business conduct in international business (hereinafter: RBC). They provide guidance for companies on, among other things, value chain responsibility, human rights, industrial relations and the environment. The Guidelines form the basis for Dutch RBC policy and (future) legislation.

All countries that endorse the OECD Guidelines, including the Netherlands, have a National Contact Point for Responsible Business Conduct (hereinafter: NCP). This is mandatory for OECD member states and candidate member states that endorse the OECD Investment Declaration. The NCP stimulates compliance with the guidelines and supports companies in applying them by raising awareness of the guidelines and handling Specific Instances regarding (alleged) violations of the guidelines. The OECD Guidelines are the only non-legal international framework for RBC with a dispute resolution mechanism.

## 1.2 Core tasks and core values of the NCP

This work programme describes how the Dutch NCP intends to carry out its tasks in 2026. The NCP has two core tasks, as laid down in the NCP Establishment Decree 2014:

The **first** core task is handling Specific Instances submitted by individuals, civil society organisations, and/or companies regarding the correct or incorrect application of the OECD Guidelines. If all parties involved agree, the NCP facilitates a dialogue through mediation. Through discussions, fact-finding and recommendations, the NCP aims to contribute to resolving the dispute or preventing escalation. Parties must agree in advance to mediation by the NCP. Additionally, upon request, the NCP can also facilitate an informal dialogue between parties, separate from the formal procedure.

The **second** core task is disseminating and interpreting the content and meaning of the OECD Guidelines for multinational enterprises in order to encourage companies to implement them. The Dutch NCP carries out this task, for example, by giving presentations and interviews, organising thematic meetings, and answering questions from stakeholders. In addition, at the request of the Cabinet, the NCP can conduct research into the broader application of the guidelines within a sector or industry.

The **core values** that the NCP applies in all its work are:

- **Visibility:** the NCP actively works to increase awareness and applicability of the OECD Guidelines;
- **Accessibility:** the NCP is easily reachable for notifiers, companies and other stakeholders and is open to dialogue with parties and stakeholders;
- **Transparency:** the NCP is transparent about the process of handling and mediation. This does not mean that the NCP is transparent about the content of the mediation, since successful mediation benefits from confidentiality;
- **Accountability:** the NCP communicates clearly about its activities, for example through an annual report and in cooperation with other NCPs;
- **Impartiality and fairness:** the NCP safeguards impartiality and prevents conflicts of interest. Procedures are clear and accessible;
- **Predictability:** the NCP publishes its procedures and keeps parties informed about the progress of Specific Instances;
- **Consistency with the Guidelines:** the NCP ensures that all procedures and mediations are in line with the OECD Guidelines.

## 2. Handling of Specific Instances

At the beginning of 2026, the NCP has 14 Specific Instances in various stages of the NCP procedure. Processing Specific Instances regarding compliance with the OECD Guidelines remains a core task. As in previous years, this will occupy the majority of the NCP's time and capacity. The NCP strives to strike a balance between speed and thoroughness. "Quality over speed" remains the guiding principle, with continued attention to timely processing.

In the first half of 2026, the Final Statements of NGOs vs. Stellantis, NGOs vs. Oikocredit, and VU vs. ONE-Dyas are expected to be published. Later in 2026, Campesinos et al vs. HES will follow. In addition, 4 follow-ups are scheduled for publication. One follow-up (Odoh family vs. SPDC) was already initiated in 2025 and will be published in 2026.

### Priorities:

- **Processing speed:** attention to timely processing remains important in 2026. The Peer Review report also provides the NCP with suggestions to keep processing times for ongoing and new Specific Instances under control;
- **Internal evaluation of closed Specific Instances:** the NCP will continue with the internal evaluation of closed Specific Instances; to learn from and with each other about what went well and what went less well during the handling of Specific Instances;
- **Coordination:** the Dutch NCP is increasingly involved in time-consuming coordination procedures with other NCPs. We aim to handle this more efficiently in 2026. After publication of the OECD Revised Guide on Coordination among NCPs, we will refine our own procedure accordingly.

## 3. Information & promotion of the application of the OECD Guidelines

In 2025, the NCP launched new communication activities and intensified existing activities on the basis of the communication plan drawn up in 2024. The communication plan focuses on further strengthening the position of the NCP as an authority on the OECD Guidelines. This includes cooperation and coordination with the RBC Helpdesk and the future supervisory authority for the Corporate Sustainability Due Diligence Directive (CSDDD) implementation act; the '*Wet internationaal verantwoord ondernemen*' (Wivo), assessment of external initiatives against the OECD Guidelines, and increasing the impact of Final Statements by broader dissemination of communications about publications, with an accessible description of one or more appealing key points from the Final Statement. In 2026, the NCP will build on this, with additional attention to streamlining the narrative about the NCP towards parties to Specific Instances and to the visibility of the NCP in the broader RBC landscape. In doing so, the NCP will continue to take into account the changing context of RBC, including developments in EU legislation and national policy initiatives.

Furthermore, the NCP will continue to be actively engaged within the international network of NCPs by contributing to knowledge-sharing between NCPs and providing support and advice on policy development in the OECD context. The NCP will also actively participate in OECD NCP network meetings and cooperate with other NCPs within the Benelux and beyond. These meetings are an important platform for exchanging experiences and discussing common challenges.

### Key activities:

- **Event for the business community:** In collaboration with employers' organisation VNO-NCW, the NCP is exploring the possibilities of organising an invitation-only event on a topic

at the intersection of OECD guidelines and upcoming CSR legislation for the benefit of the business community;

- **NCP Thematic Meeting:** Organisation of the annual Thematic Meeting for stakeholders from the business community, trade unions, civil society, and government;
- **OECD meetings:** Participation in international NCP networking meetings in Paris in June (in honour of the 50th anniversary of the OECD Guidelines) and November;
- **(Regional) cooperation with NCPs:** Consulting with other NCPs to learn from one another and, where possible, provide support.

#### **Priorities:**

- Streamlining the NCP narrative towards complainants and companies.
- Improving the accessibility of the website (launched in 2025).
- Continuation of providing information to relevant government departments and implementing organisations to increase awareness of the NCP, the Guidelines and policy coherence.

### 3.1 Policy coherence

On the basis of the revised Guidelines, NCPs have an explicit role in promoting policy coherence. The NCP also wants to contribute to this in 2026 and to support our MFA-RBC colleagues, who have a strong focus on policy coherence, wherever possible. This applies, of course, to the relationship between the Guidelines and other legislative initiatives, and also to the distinct tasks and roles of the various supervisory authorities for legislation and the NCP, as well as the different organisations that provide information on RBC.

#### **Priorities:**

- Giving priority to strengthening coherence in the area of legislation where this affects the NCP mechanism and the functioning of the NCP;
- Preparing communication on the NCP procedure compared to the Consumer and Market Authority (ACM) procedure for Specific Instances, so that it is clear what a complainant can expect where, once the Dutch law implementing the CSDDD (Wivo) enters into force;
- Clarifying the role of the OECD Guidelines and the NCP in the "RBC landscape" for companies, complainants, and RBC teams of other ministries and other stakeholders.

## 4. Peer Review

In 2025, the Dutch NCP underwent an OECD Peer Review. The purpose of this Peer Review is to evaluate the strengths and weaknesses of an NCP and to make recommendations for improvement. The recommendations from the Peer Review report will guide the further improvement of our working methods. Whether and how the recommendations will be followed up, and what will be given priority, still needs to be determined. The main recommendations are:

- clarifying the responsibilities and confidentiality arrangements of the advisory members of the NCP;
- strengthening the contribution of NCP+ stakeholders to the promotion of the NCP and the dissemination of Final Statements;
- improving the timely handling of Specific Instances through clearer expectation management and established processing timeframes;

- improving coordination and coherence with other institutions that promote sustainability in order to prevent fragmentation of knowledge and increase outreach, particularly to large companies;
- continuing the NCP's support for government policy.

Within three months of publication of the Peer Review report by the OECD, the NCP will organise a 'launch event'. During this event, the findings and recommendations from the report will be presented and discussed with stakeholders, and input will be sought from stakeholders to increase the effectiveness of the NCP. This input will be used to implement the recommendations in the report. The precise implementation will be reported to the OECD at the beginning of 2027. Throughout 2026, the NCP's activities will be geared towards following up on the Peer Review recommendations. For example, the NCP Establishment Decree 2014 will be updated and revised on the basis of recommendations from the Peer Review report.

#### **Key activities:**

- **Launch event Peer Review report:** in Q2 2026, the NCP will organise a launch event to share the outcomes of the Peer Review with stakeholders and to gather input for the practical implementation of the recommendations.

## 5. Institutional

At the beginning of 2026, a new NCP member with a trade union background will start, and the NCP will have a new Chair, due to the expiry of the former Chair's second term. The NCP secretariat will not be operating at full capacity in the first five months of 2026 due to maternity leave of one of the staff members. However, a temporary staff member has been found from the RBC department who will strengthen the NCP secretariat until the end of May.

As mentioned under section 4, in 2026 the Establishment Decree from 2014 will be amended following the Peer Review recommendations. It will also be updated and, where necessary, adjusted to the current working methods of the NCP. The advisory membership of LVVN will also be included in the amended Establishment Decree. The member from the Ministry of Infrastructure and Water Management (I&W) has relinquished the advisory membership.

In 2025, a Terms of Reference was drawn up for the seven-yearly policy evaluation of Dutch RBC policy by the Directorate for International Research and Policy Evaluation (IOB), in which the NCP is included. The evaluation will be carried out in 2026 and completed in 2027.

#### **Priorities:**

- **NCP Establishment Decree 2014:** thorough revision and updating of the Decree;
- **IOB evaluation:** providing information for the NCP component of the IOB evaluation and highlighting the importance of coherence between the findings of the OECD Peer Review and the IOB evaluation;
- **Team day:** organising an NCP team day in autumn to strengthen internal cooperation and strategy;
- **Mediation:** training for NCP members and the secretariat in the field of mediation.

With this approach, in 2026 the NCP will focus on effective implementation of its core tasks, closer cooperation with stakeholders and a strong position within RBC policy.

# Annex: composition of the NCP as of March 2026

## Members:

- Rutger Goethart, chair
- Liesbeth Enneking, member
- Kris Douma, member
- Joris Oldenziel, member

## Advisory members:

- Said El Haroui, Ministry of Foreign Affairs (BZ)
- Somayeh Djafari, Ministry of Social Affairs and Employment (SZW)
- Peter Veenhoven, Ministry of Economic Affairs and Climate Policy (EZK)
- Ralf van de Beek, Ministry of Agriculture, Fisheries, Food Security and Nature (LVVN)

## NCP+ members:

- Frans Dekker, FNV
- Marhijn Visser, VNO NCW/MKB Nederland
- Virginia Sandjojo, OECD Watch
- Martine Bosman, SER (observer)

## NCP secretariat:

- Sylvia Tuin
- Lotte Hoex
- Marina van Riel
- Mara van der Meer
- Jurre van Hees (temporarily)