

# National action plans on business and human rights to enable policy coherence for responsible business conduct



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This concept note was prepared for the session on National Action Plans on Business and Human Rights (NAPs) to enable policy coherence for responsible business conduct at the the Roundtable for Policy Makers that took place on 28 June 2017 within the framework of the OECD Global Forum on Responsible Business Conduct. This session was jointly organised by the OECD and the UN Working Group on Business and Human Rights. The note sets a basis for reflection and discussion on lessons learned from both completed NAPs and those in development. Four domains are addressed: collaboration across ministries; supply chain due diligence; access to remedy and the role of National Contact Points (NCP) for the OECD Guidelines for Multinational Enterprises in the design and implementation of NAPs; and monitoring mechanisms.

Policy coherence is crucial to ensure effective design and implementation of policies to promote responsible business conduct (RBC), including corporate respect of human rights. In 2016, policy makers attending the Roundtable for Policy Makers highlighted that many silos remain between parts of governments relevant to RBC, preventing policy coherence.<sup>1</sup> Stakeholders representing business, worker organisations and civil society have also highlighted the need to strengthen policy coherence.<sup>2</sup> The importance of policy coherence and alignment of policies in this area is also underlined in the UN Guiding Principles on Business and Human Rights (UNGPs),<sup>3</sup> as well as in the OECD Policy Framework for Investment 2015 (see Box).

The UN Human Rights Council and the UN Working Group on Business and Human Rights have called on governments to implement the UNGPs.<sup>4</sup> As of May 2017, 15 countries - all adhering to the OECD Investment Declaration have adopted a NAP<sup>5</sup> (see Annex) and 21 countries are in the process of developing or have committed to developing one.<sup>6</sup> One of the main functions of NAPs is to provide for reinforced coordination and coherence within the government on the spectrum of policies related to business and human rights.<sup>7</sup> The scope of NAPs varies from country to country. Some go beyond the theme of business and human rights by encompassing the environment (for example France and Italy) and RBC more generally, such as the United States. Some of the more recent NAPs specifically refer to the Guidance prepared by the UN Working Group<sup>8</sup> (for example France and Switzerland).

In some cases, NAPs on Business and Human Rights complement existing laws, regulations and policy tools. For instance, many EU members have adopted NAPs on Corporate Social Responsibility (CSR) following the 2011 renewal of the EU CSR strategy.<sup>9</sup> These are often drafted, coordinated and implemented by other Ministries than the ones responsible for the NAP on Business and Human Rights: while the NAPs on Business and Human Rights are most commonly led by Ministries of Foreign Affairs, this is not always the case for NAPs on CSR. For example, in Italy and Lithuania the NAPs on CSR were coordinated by the Ministry of Economic Development and the Ministry of Social Security and Labour respectively. It is important that governments ensure that the links between the different action plans are made explicit and ministries involved in developing these plans ensure complementary and alignment. This is especially relevant as a new set of national plans to implement the Sustainable Development Goals (SDGs) are being developed in line with the 2030 Agenda for Sustainable Development.<sup>10</sup> For example, Japan pledged that the progress of the NAP on Business and Human Rights would function as an indicator for the achievement of the SDGs.<sup>11</sup>

By exchanging information and sharing experiences on NAPs completed as well as NAPs under development, governments can share learnings on good practices for inter-ministerial collaboration and strengthened policy coherence. Some NAPs already include references to initiatives in other countries. For example, the French NAP adopted in April 2017 refers to useful tools deployed in Denmark, the Netherlands, Sweden, Switzerland and the United Kingdom. The Scottish NAP for Human Rights, a plan that builds on the United Kingdom NAP, followed the model national baseline assessment developed by the Danish Institute for Human Rights and the International Corporate Accountability Roundtable.<sup>12</sup> With a view to promote peer learning, the Italian NAP proposes the establishment of a peer review system for existing NAPs.<sup>13</sup> These cross-references and ideas for cooperation demonstrate the willingness across countries to learn collaboratively and the usefulness of engaging internationally.

**Box. OECD Policy Framework for Investment: Extract from Chapter 7. Policies for enabling responsible business conduct**

**"Governments should co-operate internally as well as externally with foreign governments and stakeholders to ensure coherence and support of policies relevant to RBC**

Governments should ensure coherence among domestic government agencies and bodies to ensure alignment of policies relevant to RBC.

They should also collaborate with foreign governments to establish international policy coherence on RBC in line with widely recognised instruments (e.g. OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights) which contribute to a global level-playing field for investment.

RBC has wide-reaching impacts and therefore the process of defining expectations of RBC and implementing those expectations requires consultation and co-operation amongst all relevant stakeholders – including among government agencies, companies, worker associations, professional associations, employer associations, civil society, and local communities. Governments should consult with companies and other stakeholders on existing or potential RBC policies or enforcement practices. Government should also create an enabling environment for stakeholders to engage in monitoring and promotion of RBC."

Source: OECD (2015), Policy Framework for Investment 2015, p. 76, [www.oecd.org/investment/pfi.htm](http://www.oecd.org/investment/pfi.htm).

## **Collaboration across the government**

Policy coherence relies on communication, collaboration and coordination across ministries and government agencies. Certain NAPs explain how coordination across relevant domestic government bodies takes place. One example is that of the Danish inter-ministerial group which includes seven different ministries coordinating the work on RBC.<sup>14</sup> Norway committed to establishing a similar inter-ministerial group to ensure that Norway's CSR position is aligned within the government and in international fora. Colombia's Working Group dedicated to questions on business and human rights is tasked with promoting knowledge on the topic across the government. Switzerland's NAP indicates that its inter-ministerial group for human rights has welcomed a new public policy strategy in 2016 to incorporate questions dealing specifically with business and human rights.

Countries have also created multi-stakeholder consultative centres for RBC policy development, such as the French National Platform for Corporate Social Responsibility established in 2013. Synergies can be made by associating NCP work with such consultative centres. For instance, Finland's Committee on Corporate Social Responsibility, a consultative body, together with the Ministry of Economic Affairs and Employment, act as the Finnish NCP. In Colombia, the Working Group for

business and human rights established in March 2017 is supported by a committee of experts including from civil society.

The international outreach on RBC is partly conveyed through countries' diplomatic network which provides direct access to national companies operating abroad. Embassies and consulates play a counselling role for these enterprises, especially in risk and conflict-affected areas where the respect of human rights may be threatened. Most NAPs feature the use of diplomatic networks by governments to counsel on RBC and provide guidance to enterprises operating abroad. In certain cases, this takes the form of special CSR ambassadors, such as in Sweden, or is integrated in the country's promotion team, e.g. the Team Finland network in Finland.<sup>15</sup>

Capacity-building and training of government officials is essential for a good comprehension and application of the State's commitments at all levels of the government. The NAPs of some countries propose information and training services for government officials in the form of e-learning, seminars and other learning platforms. Examples include Colombia, France, Italy and the Netherlands. The United Kingdom government created a "Business and Human Rights toolkit" which gives guidance to political, economic and commercial and development officers in overseas missions on how to promote responsible conduct for companies operating abroad, in addition to other resources and training for Foreign and Commonwealth Office and UK Department for International Trade staff, as well as trade envoys and visiting delegations.

### **Policy coherence for supply chain due diligence**

Supply chain due diligence addresses the international dimension of many modern business operations and their related risks of adverse impacts. Due diligence is the process through which enterprises can identify, prevent, mitigate and account for how they address their actual and potential negative impacts across their supply chain and business relationships.<sup>16</sup> Due diligence is an on-going process that should remain responsive, evaluative and engage stakeholders. While the promotion of supply chain due diligence is a key feature of many NAPs, a number of policy coherence challenges arise. These are linked to divergent understanding of due diligence among governments agencies, as well as differences of views on promoting due diligence.

One way to facilitate policy coherence is a common understanding across government agencies of the concept of due diligence and of the processes for carrying out due diligence. The NAPs of Finland and the Netherlands are among the few that comprehensively explain due diligence and due diligence expectations from business, using definitions from the OECD Guidelines and the UN Guiding Principles.

Using existing tools for due diligence as reference may help clarify expectations. It also provides support to different parts of the government in their understanding of how they can assist companies in conducting due diligence. Several governments refer to the **OECD due diligence sector guides** in their NAPs.<sup>17</sup> The NAPs from Colombia, France, Sweden, the United Kingdom and the United States include references to and promote the OECD Due Diligence Guidance for Responsible Minerals Supply Chains from Conflict and High Risk Areas. The NAPs of Italy and Switzerland highlight the government's efforts in implementing the OECD-FAO Guidance for Responsible Agricultural Supply Chains. The NAPs of France and Italy present the government's participation in developing the sector guidance for Responsible Supply Chains in the Textile and Garment Sector. Switzerland expresses its support for the sector guidance on the financial sector in its NAP.

Creating a coherent enabling environment for supporting business due diligence efforts may take several forms, including legislation. New laws are increasingly contributing to the policy framework in this field. Examples include the French law on the duty of vigilance enacted on 27 March 2017 which makes reporting on due diligence mandatory for certain types of enterprises.<sup>18</sup> As part of their NAPs, some European countries also contributed to the development of the European Union

regulation on conflict minerals which will take effect in 2021 requiring EU-based companies to ensure they import certain minerals and metals from responsible sources<sup>19</sup> building on the OECD Guidelines. Complementary policy instruments may be attached to legislation. For instance, the UK Modern Slavery Act (2015) is part of the UK Modern Slavery Strategy and was coupled with the creation of an Independent Anti-Slavery Commissioner.

Providing relevant information to companies as they seek to assess risks in their supply chains also contributes to the promotion of due diligence. This may include adapting existing tools. The Swedish NAP provides that the Ministry for Foreign Affairs' reports on human rights situations in different locations is made more accessible to companies, and is completed with guidance on human rights issues and risks in the different countries in which Swedish business may operate. The United Kingdom NAP provides for the inclusion of specific country human rights information and links to the UNGPs and other relevant tools and guidance in the Foreign and Commonwealth Office - UK Trade and Investment Overseas Business Risk (OBR) service. The NAPs of France<sup>20</sup> and the United States<sup>21</sup> provide for establishing online resource platforms gathering information related to RBC to increase accessibility of relevant documentation for enterprises.

Other tools to support companies in conducting due diligence were developed and can be used across the government as reference. For example, the Danish government in collaboration with stakeholders from the business and civil society communities created the *CSR Compass*, a free online tool to support companies comply with international guidelines for responsible business conduct in the supply chain.<sup>22</sup> The Danish NAP provides for this online tool to be promoted across governmental departments, agencies and other State-based institutions. The United States Department of Labor regularly develops reports on international child labour and forced labour, which are used by the government as well as national and international stakeholders from civil society and the private sector for identifying high-risk countries and products.<sup>23</sup> A mobile application was developed to make this information more accessible.<sup>24</sup>

### **Access to remedy and the role of NCPs in designing and implementing NAPs**

Providing access to remedy is a key component of the UNGPs and the OECD Guidelines. The UNGPs calls on states to take steps to ensure that when abuses occur within their territory or jurisdiction, those affected have access to effective remedy. The NCPs established by Adherents to the OECD Guidelines are one of the few existing non-judicial mechanisms providing access to remedy for cases of alleged non-observance of the OECD Guidelines.

Assessing the availability and effectiveness of domestic mechanisms providing remedy is a useful exercise for governments to create a baseline upon which to ensure access to remedy. For instance, the United Kingdom commissioned an independent survey of the UK provision of remedy to help understand judicial and non-judicial remedies available to victims of human rights harms involving enterprises. As part of its NAP, Italy plans to identify barriers to access to judicial remedy and evaluate the introduction of relevant legislative measures to strengthen access to effective remedy.

NCPs form an important part of NAPs as state-based non-judicial mechanisms. NCPs are highlighted in all but one NAP (see Annex).<sup>25</sup> Many NCP representatives have taken part in the design and development of NAPs. For example, several members of the French NCP contributed to the elaboration of the country's NAP through the French National Platform for Corporate Social Responsibility or from their respective administrations and organisations.<sup>26</sup> The Italian NCP participated in the inter-ministerial Committee on Human Rights to develop the Italian NAP.<sup>27</sup> The Finnish Committee on Corporate Social Responsibility, which is part of the NCP, is tasked with monitoring the implementation of the action plan on a yearly basis.

There have been several calls by civil society<sup>28</sup>, and commitments by governments<sup>29</sup> to strengthen existing state-based grievance mechanisms, such as NCPs. Among them were the pledges by the G7

Leaders in 2015 to strengthening mechanisms for providing access to remedy including the NCPs,<sup>30</sup> and of the 2017 G20 Labour and Employment Ministers to “strengthen and increase the visibility of the OECD National Contact Points”,<sup>31</sup> followed by that of OECD Ministers on the occasion of the 2017 Ministerial Council Meeting (MCM).<sup>32</sup> In response, countries, such as Finland, France, Germany, Italy and Spain included in their NAPs the commitment to strengthening their NCP or to channel additional resources to it, or both. Some countries, such as Colombia and the Netherlands, include in the NAP plans to conduct internal reviews of their NCP. In response to the June 2015 G7 Leaders’ Summit Declaration, France, Germany, Italy and the United States committed to NCP peer reviews in their NAPs.<sup>33</sup>

Coordination with different government departments can also help **raise the visibility** of grievance mechanisms. For example, Italy plans to launch an awareness campaign on non-judicial grievance mechanisms, through diplomatic and consular networks, with the involvement of Italian Chambers of Commerce abroad.

## Implementation and monitoring mechanisms

NAPs take stock of existing governmental actions relevant to the UNGPs and introduce new actions to be implemented. To support the implementation of these actions, certain countries attribute different responsibilities to distinct parts of the government. Proposed activities to undertake and their matching implementing departments or agencies are for example at the centre of the NAPs of Switzerland and the United States. Communicating clear actions to be taken enhances the transparency of the NAP and the accountability of the government.

Inter-ministerial groups tasked with monitoring the NAP have been set up in Colombia, Finland, Italy, Germany and Norway. This will permit for each member of the group to contribute based on policy expertise and to assess any needs for amendments in the legislative framework. The Colombian Working Group for business and human rights and its committee of experts are responsible for evaluating and following-up on the plan according to objectives and indicators they are to design.

Many governments plan to monitor NAPs by consulting stakeholders. The United Kingdom NAP provides for regular stakeholder consultations to monitor implementation of the NAP and has established a dedicated email address to facilitate ongoing input from interested parties. This is also the case in the Finnish NAP which proposes that the implementation of the action plan be monitored each year by the Finnish Committee on Corporate Social Responsibility, which comprises government representatives, as well as representatives of industry, trade unions and civil society.<sup>34</sup> In line with the Guidance of the UN Working Group on Business and Human Rights, the French NAP is to be monitored by an independent entity, the existing National Commission on Human Rights (CNCDH) which will release regular reports on the implementation of the NAP.<sup>35</sup>

Setting timeframes for revisions can be useful for coordination purposes, both in rolling out the national strategy and to provide visibility to stakeholders who will participate in this revision. Italy’s plan covers the period 2016-2021 and regular monitoring is provided for, including a mid-term review in 2018. The Swiss NAP covers the period 2016-2020, and plans for a revised version of the plan to be available at the end of that term following the recommendations of the UN Working Group on Business and Human Rights.<sup>36</sup> While the Finnish plan is not bound to a certain period, the majority of the proposed measures were scheduled to be actioned between 2014 and 2016. Since the adoption of its NAP in 2013, the United Kingdom is the only country that has been updated (in May 2016). Lithuania has initiated the process for the renewal of its NAP in May 2017.

The efforts deployed in monitoring the implementation of NAPs demonstrate the commitment by countries to deliver on the UN Guiding Principles and the RBC agenda. Evaluations and consultations can also be useful to adjust the action plan and prepare for future updates. Several NAPs plan for revisions to take place, including Colombia, Italy and Switzerland.

## Notes

- <sup>1</sup> 2016 OECD Global Forum on Responsible Business Conduct, High-level Roundtable for Policy Makers, Summary.
- <sup>2</sup> This is illustrated by the outcomes of the consultations leading up to the establishment and update of the NAP in the Netherlands and the United Kingdom respectively; ICAR-ECCJ Assessments of existing national action plans (NAPs) on business and human rights, 2015. See <https://static1.squarespace.com/static/583f3fca725e25fcd45aa446/t/58da9ec3e3df280b4c4d95cd/1490722506902/ICAR-ECCJ-Assessments-of-Existing-NAPs-2015-Update.pdf>.
- <sup>3</sup> See Principles 8-10.
- <sup>4</sup> See Human Rights Council resolution 26/22 (June 2014), noting the important role of NAPs as a tool for promoting the comprehensive and effective implementation of the Guiding Principles on Business and Human Rights and encouraging all States to develop a national action plan or other such framework (A/HRC/RES/26/22).
- <sup>5</sup> Colombia (only in Spanish), Denmark, Italy, Finland, France (only in French), Germany (only in German), Lithuania, the Netherlands, Norway, Poland (only in Polish, English version to be released in July 2017), Spain (only in Spanish), Sweden, Switzerland (only in French), the United Kingdom and the United States. The Polish NAP 2017-2020 was accepted by the Polish government on 29 May 2017, after the finalisation of the analysis for this paper. [www.ohchr.org/EN/Issues/Business/Pages/NationalActionPlans.aspx](http://www.ohchr.org/EN/Issues/Business/Pages/NationalActionPlans.aspx).
- <sup>6</sup> Argentina, Australia, Azerbaijan, Belgium, Chile, Czech Republic, Guatemala, Greece, Ireland, Japan, Jordan, Kenya, Luxembourg, Malaysia, Mauritius, Mexico, Mozambique, Myanmar, Portugal, Slovenia and Thailand. See State national action plans, [www.ohchr.org/EN/Issues/Business/Pages/NationalActionPlans.aspx](http://www.ohchr.org/EN/Issues/Business/Pages/NationalActionPlans.aspx).
- <sup>7</sup> UN Working Group on Business and Human Rights (2016), Guidance on National Action Plans on Business and Human Rights, p. 1, [www.ohchr.org/Documents/Issues/Business/UNWG\\_NAPGuidance.pdf](http://www.ohchr.org/Documents/Issues/Business/UNWG_NAPGuidance.pdf).
- <sup>8</sup> UN Working Group on Business and Human Rights (2016), Guidance on National Action Plans on Business and Human Rights, [www.ohchr.org/Documents/Issues/Business/UNWG\\_NAPGuidance.pdf](http://www.ohchr.org/Documents/Issues/Business/UNWG_NAPGuidance.pdf).
- <sup>9</sup> European Commission (2011), A renewed EU strategy 2011-14 for Corporate Social Responsibility, [www.europarl.europa.eu/meetdocs/2009\\_2014/documents/com/com\\_com\(2011\)0681/com\\_com\(2011\)0681\\_en.pdf](http://www.europarl.europa.eu/meetdocs/2009_2014/documents/com/com_com(2011)0681/com_com(2011)0681_en.pdf).
- <sup>10</sup> Each government decides on how to incorporate the sustainable development goals and targets into national planning processes, policies and strategies. See paragraph 55 of the Resolution adopted by the General Assembly on 25 September 2015, 70/1. Transforming our world: the 2030 Agenda for Sustainable Development, [www.un.org/ga/search/view\\_doc.asp?symbol=A/RES/70/1&Lang=E](http://www.un.org/ga/search/view_doc.asp?symbol=A/RES/70/1&Lang=E).
- <sup>11</sup> Japan, The SDGs Implementation Guiding Principles (2016), [www.mofa.go.jp/mofaj/gaiko/oda/files/000252819.pdf](http://www.mofa.go.jp/mofaj/gaiko/oda/files/000252819.pdf).
- <sup>12</sup> The Danish Institute for Human Rights and International Corporate Accountability Roundtable, National Action Plans on Business and Human rights, [www.humanrights.dk/sites/humanrights.dk/files/media/dokumenter/udgivelser/DIHR%20-%20ICAR%20National%20Action%20Plans%20%28NAPs%29%20Report.pdf](http://www.humanrights.dk/sites/humanrights.dk/files/media/dokumenter/udgivelser/DIHR%20-%20ICAR%20National%20Action%20Plans%20%28NAPs%29%20Report.pdf).
- <sup>13</sup> Italian National Action Plan on Business and Human Rights 2016-2021, p. 25, [www.cidu.esteri.it/resource/2016/12/49117\\_f\\_NAPBHRENGFINALEDEC152017.pdf](http://www.cidu.esteri.it/resource/2016/12/49117_f_NAPBHRENGFINALEDEC152017.pdf).
- <sup>14</sup> The inter-ministerial group includes the Ministry of Business and Growth, Ministry of Foreign Affairs, Ministry of Employment, Ministry of Environment, Ministry of Finance, Ministry of Food, Agriculture and Fisheries, Ministry for Climate, Energy and Building. It also includes the Investment Fund for Developing Countries. Danish National Action Plan, p. 11, [www.ohchr.org/Documents/Issues/Business/NationalPlans/Denmark\\_NationalPlanBHR.pdf](http://www.ohchr.org/Documents/Issues/Business/NationalPlans/Denmark_NationalPlanBHR.pdf).
- <sup>15</sup> See also the Roundtable background paper on *Responsible Business Conduct and Economic Diplomacy Tools*.
- <sup>16</sup> See UNGPs, Principles 17-21, and OECD Guidelines for Multinational Enterprises, Commentary on General Policies, Paragraph 14.
- <sup>17</sup> The OECD has developed the following sectoral guidance: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; OECD-FAO Guidance for Responsible Agricultural Supply Chains; OECD Due Diligence Guidance for Meaningful Stakeholder Engagement in the Extractive Sector; The OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector; The OECD has also developed papers on responsible business conduct in the financial sector.

18 LOI n° 2017-399 du 27 mars 2017 relative au devoir de vigilance des sociétés mères et des entreprises donneuses  
d'ordre (1) [www.assemblee-nationale.fr/14/dossiers/devoir\\_vigilance\\_entreprises\\_donneuses\\_ordre.asp](http://www.assemblee-nationale.fr/14/dossiers/devoir_vigilance_entreprises_donneuses_ordre.asp)

19 European Commission, The regulation explained, [http://ec.europa.eu/trade/policy/in-focus/conflict-minerals-](http://ec.europa.eu/trade/policy/in-focus/conflict-minerals-regulation/regulation-explained)  
regulation/regulation-explained.

20 See “Propositions d’action 6”, French National Action Plan on Business and Human Rights

21 See “Outcome 3.1: U.S. Government Reports”, US National Action Plan on Responsible Business Conduct.  
22 [www.csrcompass.com/](http://www.csrcompass.com/)

23 United States Department of Labor, List of Goods Produced by Child Labor or Forced Labor (2016),  
[www.dol.gov/ilab/reports/](http://www.dol.gov/ilab/reports/).

24 United States Department of Labor, Sweat & Toil: Child Labor, Forced Labor, and Human Trafficking Around the  
World, [www.dol.gov/dol/apps/ilab.htm](http://www.dol.gov/dol/apps/ilab.htm).

25 The current Lithuanian NAP does not mention the NCP.

26 France, National Contact Point for the OECD Guidelines for Multinational Enterprises 2016 Report to the OECD.

27 Italy, National Contact Point for the OECD Guidelines for Multinational Enterprises 2016 Report to the OECD.

28 See OECD Watch (2015), Remedy Remains Rare.

29 See for example Country visit report by the UN Working Group on Business and Human Rights  
[www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21680&LangID=E](http://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=21680&LangID=E).

30 The 2015 G7 Leaders’ Declaration commits to “strengthening mechanisms for providing access to remedies  
including the National Contact Points (NCPs) for the Guidelines for Multinational Enterprises”. See G7 (2015),  
Leaders’ Declaration G7 Summit, 7-8 June 2015.

29 Towards an Inclusive Future: Shaping the World of Work, G20 Labour and Employment Ministers Meeting 2017,  
[www.g20.utoronto.ca/2017/170519-labour.html](http://www.g20.utoronto.ca/2017/170519-labour.html).

32 2017 Ministerial Council Statement, Making Globalisation Work: Better Lives for All  
[www.oecd.org/mcm/documents/2017-ministerial-council-statement.htm](http://www.oecd.org/mcm/documents/2017-ministerial-council-statement.htm).

33 The French and the Italian NCP peer reviews have since taken place.

34 Ministry of Economic Affairs and Employment, Finland, Committee on Corporate Social Responsibility,  
<https://tem.fi/en/committee-on-corporate-social-responsibility>.

35 See French National Action Plan on the Implementation of the UN Guiding Principles on Business and Human  
Rights, p. 6. [www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/droits-de-l-homme/entreprises-et-droits-](http://www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/droits-de-l-homme/entreprises-et-droits-de-l-homme/article/adoption-du-plan-national-d-action-pour-la-mise-en-oeuvre-des-principes)  
[de-l-homme/article/adoption-du-plan-national-d-action-pour-la-mise-en-oeuvre-des-principes](http://www.diplomatie.gouv.fr/fr/politique-etrangere-de-la-france/droits-de-l-homme/article/adoption-du-plan-national-d-action-pour-la-mise-en-oeuvre-des-principes).

36 UN Working Group on Business and Human Rights (2015), Guidance on National Action Plans on Business and  
Human Rights Version 2.0.

**Table 1. Adherents to the OECD Guidelines for Multinational Enterprises and National Action Plans on Business and Human Rights/RBC**

Adherent country	Status of NAP on business and human rights	Reference to the OECD Guidelines	Reference to NCPs	Web link
Argentina				
Australia	In progress			
Austria				
Belgium	In progress	Yes	Yes	
Brazil	In progress	Yes	Yes	
Canada				
Chile	In progress	Not reported	Not reported	
Colombia (Spanish)	Completed 2015	Yes	Yes	<a href="http://bit.ly/29upN14">http://bit.ly/29upN14</a>
Costa Rica	In progress	Yes	Not reported	
Czech Republic	In progress	Yes	Yes	
Denmark	Completed 2014	Yes	Yes	<a href="http://bit.ly/1IDsjAT">http://bit.ly/1IDsjAT</a>
Egypt				
Estonia				
Finland	Completed 2014	Yes	Yes	<a href="http://bit.ly/2s0ktKX">http://bit.ly/2s0ktKX</a>
France	Completed 2017	Yes	Yes	<a href="http://bit.ly/2ppOz9d">http://bit.ly/2ppOz9d</a>
Germany	Completed 2016	Yes	Yes	<a href="http://bit.ly/2hZQStz">http://bit.ly/2hZQStz</a>
Greece	In progress			
Hungary	In progress	Not reported	Not reported	
Iceland				
Ireland	In progress	Not reported	Not reported	
Israel				
Italy	Completed 2016	Yes	Yes	<a href="http://bit.ly/2rQ0dJJ">http://bit.ly/2rQ0dJJ</a>
Japan	In progress	Not reported	Not reported	
Jordan	Completed 2016	No	No	
Korea	In progress	Yes	Yes	
Latvia	In progress	Not reported	Not reported	
Lithuania	Completed 2015	No	No	<a href="http://bit.ly/1DMB310">http://bit.ly/1DMB310</a>
Luxembourg				
Mexico	In progress	Not reported	Not reported	
Morocco	In progress	Not reported	Not reported	
Netherlands	Completed 2013	Yes	Yes	<a href="http://bit.ly/2s00sE8">http://bit.ly/2s00sE8</a>
New Zealand				
Norway	Completed 2015	Yes	Yes	<a href="http://bit.ly/2rQhhiRv">http://bit.ly/2rQhhiRv</a>
Peru				
Poland	Completed 2017	Yes	Yes	<a href="http://bit.ly/2rMaPws">http://bit.ly/2rMaPws</a>

Adherent country	Status of NAP on business and human rights	Reference to the OECD Guidelines	Reference to NCPs	Web link
Portugal	In progress	Not reported	Not reported	
Romania				
Slovak Republic				
Slovenia	In progress	Not reported	Not reported	
Spain (Spanish)	Completed 2014	Yes	Yes	<a href="http://bit.ly/1JA5V2V">http://bit.ly/1JA5V2V</a>
Sweden	Completed 2015	Yes	Yes	<a href="http://bit.ly/1N42E2a">http://bit.ly/1N42E2a</a>
Switzerland	NAP on RBC completed 2015 NAP on Business and Human Rights completed 2016	Yes	Yes	<a href="http://bit.ly/2rHBx7K">http://bit.ly/2rHBx7K</a>
Tunisia				
Turkey				
United Kingdom	Completed 2013, Updated 2016	Yes	Yes	<a href="http://bit.ly/1Ws63MC">http://bit.ly/1Ws63MC</a>
United States	NAP on RBC completed 2016	Yes	Yes	<a href="http://bit.ly/2r1JnWT">http://bit.ly/2r1JnWT</a>

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