

# Strengthening National Action Plans for business and human rights:

25 recommendations to improve impact and increase  
alignment with the OECD Guidelines



## Introduction

National Action Plans for Business and Human Rights (NAPs) have the potential to transform how governments align their national development plans with their human rights obligations. NAPs provide states the opportunity to concretely detail their commitment to ensure corporate respect for human rights and access to remedy for victims of business-related harms through binding and voluntary measures. If meaningfully drafted and implemented, NAPs can also curtail the harmful impacts of business in society by advancing responsible business standards like those embedded in the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) (OECD Guidelines).

In practice, however, the outcomes of many NAPs have been disappointing. NAPs have been criticised for reasons related to their inadequate preparation, unambitious content, and weak implementation. Insufficient engagement of stakeholders – especially impacted rightsholders and human rights defenders – as well as poor transparency have also been leading problems.

Recently, civil society members of the OECD Watch network convened to identify the root causes for why NAPs do not live up to their potential. Members highlighted solutions to correct the gaps and explored a key role for the OECD Guidelines and National Contact Point (NCP) complaint mechanisms in improving impact moving forward.

This report lays out what members have found:

- Part I introduces NAPs and their potential positive impact. It also highlights the less-explored nexus with the OECD Guidelines and NCPs.
- Part II lays out the problems we identify across three stages of NAP formation – preparation, content design, and implementation – and offers 25 recommendations to resolve them, including with an eye to where the OECD Guidelines and NCPs can support.

Where relevant, analysis and recommendations related to the OECD Guidelines are highlighted. We encourage governments undertaking or considering NAPs, states and multilateral institutions that support and fund NAPs, as well as civil society engaged alongside a NAP, to consider our analysis. Meanwhile, non-governmental organisations (NGOs) interested in connecting into a global civil society dialogue on this topic can [contact OECD Watch](#).

## PART I

# About NAPs for business and human rights

### What is a NAP?

Broadly speaking, a NAP is a policy document articulating a state's priorities and the actions it will adopt to support the implementation of international, regional, and/or national obligations and commitments on a given policy area or topic.

A NAP for business and human rights, more specifically, is a plan by a government to ensure state entities and systems protect human rights from business harm, companies respect human rights in their global operations, and victims can access remedy through effective judicial and non-judicial grievance mechanisms. The UN Working Group on Business and Human Rights (UNWG) has defined a NAP on business and human rights as an "evolving policy strategy developed by a State to protect against adverse human rights impacts by business enterprises in conformity with the UN Guiding Principles on Business and Human Rights (UNGPs)". The UNWG strongly encourages all states to develop, enact, and update periodically a NAP. This [website](#) tracks governments progress on NAPs around the world.

In this report, our discussion of NAPs refers specifically to NAPs for business and human rights or responsible business conduct (RBC).

### Positive impacts of NAPs

In theory, NAPs have a lot of potential. The formation of a NAP can create a meaningful platform for dialogue between governments, civil society, human rights defenders, Indigenous Peoples, communities, unions and workers, and companies on curbing harmful excesses of business activity. NAPs can draw out key rightsholder perspectives on business practices violating international norms. NAPs can also facilitate a valuable birds-eye view of the many aspects of national policy that relate to business and human rights. This in turn can enable assessment of how well these policies are facilitating protection of human rights and the environment, and planning to close the gaps. Critically, if NAPs contain meaningful binding commitments for state and corporate actors - a 'smart mix' of mandatory and voluntary measures as recommended by the UNGPs - they can tangibly improve how rights are protected, how businesses operate, and how easily and effectively victims can access remedy.

### NAPs and the OECD Guidelines

Technically, NAPs are not directly related to the OECD Guidelines. NAPs are meant to translate the UNGPs into national policy and law. The UNGPs contain the "Protect, Respect and Remedy" framework, so a NAP is essentially a tool for a state to achieve that framework nationally.

The OECD Guidelines are recommendations authored by governments to business on how to conduct business responsibly. Directed to multinationals of all sizes, ownership models, and structures specifically (rather than states as well), but covering many more topics than human rights (such as corruption, environment, and science and technology), the Guidelines are at once narrower and broader than the UNGPs. The OECD Guidelines' language intentionally mirrors and aligns with that of the UNGPs. But they are under the purview of the OECD, not the UN.

Yet in practice, the nexus between the OECD Guidelines and NAPs is becoming closer. While the UNGPs may be the starting point for a NAP, many NAPs refer to the OECD

Guidelines as well. Some NAPs, for example, have included commitments to promote the OECD Guidelines to companies, or establish or improve a National Contact Point for Responsible Business Conduct (the “NCP” is the national office that promotes the OECD Guidelines). Some NAPs have been used to commit the government to consider applying consequences (penalties) to companies that don’t engage in good faith in the NCP complaint process (for example, the [Dutch NAP](#)). In some cases, NCPs have played a strong role in helping create the NAP (for example, in the United States). Indeed, where a NAP is in place, there is a higher possibility that the NCP will be activated as a focal point—for promoting awareness on RBC, but also for handling complaints on cross-cutting matters that connect the Guidelines and the NAP. Meanwhile, several NAPs have been named NAPs “for Responsible Business Conduct” instead of “for Business and Human Rights” (see again, for example, [the United States](#)) – using terminology featuring strongly in OECD standards.

Moreover, in its 2022 [Recommendation on the Role of Government in Promoting Responsible Business Conduct](#), the OECD recognised “that National Action Plans on Responsible Business Conduct or Business and Human Rights can provide an important overarching policy framework for concrete state action for RBC, developed through inclusive stakeholder engagement”.

## How the OECD Guidelines can contribute to NAPs

While distinct from the UNGPs and NAPs, the OECD Guidelines, related OECD [due diligence guidance](#), and *Recommendation on the Role of Government* are highly relevant to NAP drafters and implementers.

- The OECD Guidelines offer more detail than the UNGPs on how companies should respect human rights (Pillar 2 of the UNGPs). In this sense, NAP drafters can use the OECD Guidelines to flesh out implementation of that Pillar, and not only for human rights as covered in the UNGPs, but also labour, environment, anti-corruption, science and technology, competition, taxation, and other topics addressed in the Guidelines’ recommendations. It also helps that the Guidelines and related due diligence guidance are well-known by companies.
  - The OECD’s library of due diligence guidance offers even more detail than the Guidelines on practical implementation of due diligence by companies.
- The OECD’s *Recommendation* has insight to offer on the state duty to protect human rights (Pillar 1 of the UNGPs). The Recommendation outlines how governments can create an enabling environment to support implementation of RBC standards by companies. It provides recommendations for governments to promote RBC, such as by designing laws and policies requiring RBC, creating rules and incentives for responsible business, and leading by example in their own economic activities. Indeed, the OECD and its RBC-related standards go a bit further than the UNGPs in their focus on relevant topics such as public procurement, state-owned enterprises, and trade and investment agreements.
- Finally, the NCPs – as the leading state-backed, non-judicial grievance mechanism for harm from business activity – provide states one key means to enable access to remedy (Pillar 3 of the UNGPs), provided governments ensure the NCP is actually effective in that task.

## PART II

# Recommendations to strengthen NAPs' impact and alignment with the OECD Guidelines

### Causes of weak NAPs

Despite their potential, NAPs typically fail to meet rightsholders' reasonable expectations of tangible change in state practice to protect human rights from business harm, impactful requirements for corporate conduct, and easier access to remedy. Part of the weakness of NAPs lies beyond their control, in the structure of our global economic system itself, which prioritises corporate profit over human and planetary wellbeing (or wrongly assumes the two are synonymous). Because governments and companies to some degree lack a path forward, or the incentives, to change the status quo and adopt policies protecting human rights and the environment, there is frequently insufficient political will to actualise impactful changes. In this context, a NAP may instead serve as a bluewashing exercise to satisfy domestic stakeholders and foreign donor and investor partners. At best, resource constraints and associated time delays and implementation gaps may hinder a genuinely well-intentioned effort.

### Key recommendations to achieve successful NAPs

Ultimately, the issues associated with NAPs can only be resolved by states rebalancing or integrating focus on economic growth against focus on human and planetary wellbeing, equally critical national and global priorities. But here our focus is more practical, addressed at correcting NAP failures. We suggest that if enough light can be shone on vulnerabilities in the *whole* NAP development process, and if key actors inside and outside the country can be enabled or pressured to put sufficient steps and safeguards in place to necessitate real change, then a NAP can meaningfully contribute to

A critical first step is understanding the phases of NAP development, and the solutions that should be put in place to problems that arise at each stage. This was the focus of OECD Watch members' analysis. Here below we describe the common problems and our recommended solutions, for each stage.

#### Stage 1: NAP Preparation

We all know the phrase "preparation is half the battle". With respect to NAPs, here's what gearing up should entail.

#### Recommendations

##### 1. Involve all stakeholders including rightsholders in the preparation for the NAP.

Impacted communities including Indigenous Peoples, human rights defenders, local and national civil society, workers, unions, academia, diverse political parties, companies in different sectors and levels in the value chain, and various government institutions all have vital perspectives to share. A NAP won't work if it doesn't include their input from the beginning. The first thing NAP funders and creators should do is ensure every knowledgeable constituency has a seat at the table.

- a. The OECD *Recommendation* recognises that NAPs "can provide an important overarching policy framework for RBC" if "developed through inclusive stakeholder engagement". The *Recommendation* dedicates one of six sections to the importance of governments ensuring broad engagement of stakeholders in policymaking on RBC. It highlights that governments "should give particular consideration to vulnerable groups, such as human rights defenders and indigenous peoples, who may face difficulties in participating in the development and implementation of responsible business conduct policies."

**2. Start with a comprehensive and inclusive national baseline assessment.**

The importance of a strong baseline assessment documenting current gaps in government policies, corporate regulations, and paths to remedy for victims cannot be overstated in the context of NAPs. Yet while it seems self-evident, many NAPs *do not* begin with a baseline assessment. However, a national baseline assessment is essential to establish the fundamental basis from the which the NAP will rebuild. Critically, the assessment must be holistically centred in international human rights standards, something **criticised** in the case of Japan, for example. It must also explicitly address the role of companies in directly or indirectly causing human rights violations and identify lack of coherence across government policies and activities, in order to mend siloed or inconsistent approaches. National baseline assessments have been carried out by national development aid agencies, national human rights institutions (NHRIs), or sometimes civil society groups – but it's important all stakeholders and rightsholders are involved to identify all the gaps. Here's a [tool for carrying out baseline assessments](#).

**3. Ensure focus on all the responsible business conduct issues addressed in the**

**Guidelines.** While the UNGPs focus on human rights, the OECD Guidelines extend further to cover labour, environment, anti-corruption, science and technology, competition, taxation, and other topics. While these topics can be brought in through a human rights lens, opening the framing to focus more simply on corporate responsibility and sustainability in all these areas will help ensure no sub-issues or problematic policy gaps are overlooked.

**4. Ensure an integrated focus on human rights, climate, and nature.** Climate and nature are as deeply threatened by irresponsible business activity as human rights, and also closely underpin human rights. Moreover, the right to a healthy environment has been recognised as a human right at the UN. Governments should seize the opportunity a NAP provides to be coherent in ensuring regulation to prevent and address business impacts on all three of these issues. In this regard, the OECD Guidelines are a useful reference: with standards for companies on human rights, climate, and nature (covering biodiversity, waste, pollution, ecosystems, etc.), they already helpfully point governments towards a more effective integrated approach. Harmonising these three concepts into NAPs helps governments meet the OECD's recommendations of policy alignment.

**4. Ensure focus on all three Pillars of the UNGPs.** While it can be challenging for all three pillars to be covered, that is essential. NAPs in [Belgium](#) and [Colombia](#) have reached some success through combining different data collection methodologies to assess the baseline for all three topics.

## Stage 2: NAP Design

Once the preparation for a NAP has been completed, it's time to draft it. OECD Watch members have numerous recommendations for how to do that effectively to counterbalance the opposing regressive incentives and resource constraints that can otherwise drive governments towards underachievement.

### Recommendations

- 1. Adopt commitments that respond to the gaps identified in the national baseline assessment.** Drafters should closely and intentionally link recommendations in the NAP to the shortcomings found in the national baseline assessment. This means commitments should respond to the problems identified by civil society, communities, workers, and other stakeholders (not necessarily every problem raised, but a decent and equitable number of them).
- 2. Continue to ensure all stakeholders, including rightsholders, meaningfully engage in the NAP's drafting.** Regarding stage 1 above, all stakeholders including rightsholders should be involved in the preparation for a NAP. The same holds for the drafting. Too often there is insufficient consultation of stakeholders, especially rightsholders, civil society, and impacted workers and communities, to inform the drafting of NAPs. Yet these groups, including civil society organisations and unions, are the ones with closest awareness of the harms needing fixing, and least conflict of interest in fixing them. Community and civil society stakeholders often find themselves advocating for a voice from the outside - take Nepal for example, where the Nepal Business and Human Rights Network, a civil society working group, [sought a voice](#) and ended up organising the national consultation with civil society leaders and human rights defenders from across the country to review the public draft of the NAP. A better approach is for governments to ensure stakeholders a clear role at the outset through designing a robust consultation and engagement structure and methodology to inform the full process of the NAP drafting. It's particularly important to ensure representation by marginalised groups, including women and Indigenous Peoples. Roundtables on particular topics, an approach used in [Peru](#), can enable the capturing of key perspectives on important issues, like gender-specific impacts of business.
- 3. Ensure transparency in the design and drafting process.** It's important that governments ensure transparency throughout the drafting process, including over what text is included, when and how consultations and reviews will take place, and how stakeholder comments are being taken on board or not.
- 4. Begin the NAP process at the start of a political administration.** NAPs have often been drafted at the end of a government political administration. It's impossible to say exactly why this is the case, but perhaps it's because NAPs weren't an earlier priority, or to enable an outgoing government to make lofty commitments it won't be on the hook to implement, or simply because an administration underestimates the time it will take to complete and implement a NAP. Because subsequent administrations often want to throw out the policy plans of the prior government, the NAP may be scrapped or may languish. Doing a NAP effectively and transparently does take time. So moving the drafting time to the start of an administration moves the implementation forward too, better enabling actual impact.

- 5. Adhere to fundamental human rights and environmental standards.** The NAP should reference and be underpinned by internationally agreed human rights and environmental instruments such as the Universal Declaration on Human Rights and associated Covenants, the Declaration on the Rights of Indigenous Peoples, the Declaration on Human Rights Defenders, and the Paris Agreement, among many others. It's also important to reference the OECD Guidelines, due diligence guidance and, particularly for the 52 governments adhering to it, the OECD *Recommendation*. NAPs should always require corporate observance of the OECD Guidelines and call for good faith participation in NCP complaints. Ensuring the NAP aligns with global norms will make it more resistant to dilution by competing political or economic interests.
- 6. Address impacts wherever they occur.** Some NAPs have focused on addressing risks in value chains, but not in the host state itself. It is important that a NAP cover the full jurisdiction it is in as well as impacts in the value chains of its businesses.
- 7. Take on the inconsistency or lack of coordination across relevant state institutions and prioritise policy coherence.** Because RBC spans numerous cross-cutting areas the absence of inter-agency coherence can significantly undermine both policy alignment and enforcement capacity. Drawing from the baseline assessment, the NAP should commit to align laws, regulations, and institutional frameworks across government ministries and agencies so that economic, trade, investment, labour, and environmental policies do not contradict but instead reinforce human rights commitments. By ensuring that all state actions are guided by the UNGPs, and that human rights and environmental due diligence is integrated into the nation's development and business agenda, NAPs can prevent gaps, overlaps, and contradictions. A NAP can help to join up different RBC elements and provide a roadmap for how to navigate these, including across different relevant laws and policies.
- 8. Make SMART commitments.** Language on "encouraging" this or "trying to do" that is unhelpful. Instead, commitments made in NAPs must be specific to carry out X or Y law or policy on business and human rights; measurable, achievable, relevant (referencing national baseline assessments), and time-bound within an appropriately short time frame. Each commitment must be conspicuously assigned to a core implementer so there is accountability in implementation. Here's a [tool on developing NAPs](#), including ensuring SMART commitments.
- 9. Make bold and binding commitments.** This means both binding on the government – such as time-bound commitments to phase out export credit services and investment for fossil fuels, or to formally recognise Indigenous Peoples' rights – and also binding on companies – such as government commitments to establish mandatory human rights and environmental due diligence, as occurred with [Germany](#).

  - a. With respect to the latter, it's important to highlight that in the OECD Recommendation, the 52 authoring governments have already recommended that states develop legal and regulatory frameworks to enable RBC, aligning with RBC standards and in particular

the OECD due diligence guidance when developing new policies, laws, or regulations. As the Recommendation notes, implementation of voluntary measures has been “uneven” at best - so it’s essential a NAP moves the needle to achieve concrete and binding commitments. We also note that governments need not begin with a NAP before moving decisively towards adopting binding corporate accountability legislation.

**10. Focus on remedy.** Commitments on the UNGPs’ Pillar 3 on remedy are often very weak in NAPs. That serious gap must be closed through robust focus on reforms needed by states and companies to ensure remedy, as much as either may wish to avoid taking up the burden of addressing harms done.

**11. Consider a focus on, and even role for, NCPs.** The majority of NAPs from OECD member states include actions regarding the NCP. More NAPs could do so, explicitly referencing NCPs in relation to remedy and calling for improvements for NCPs to meet **key performance indicators**. Meanwhile NAPs of countries not adhering to (formally following) the Guidelines could be used to help express the government’s intention to adhere and establish a new and effective NCP. Where an NCP exists, the NAP should ensure the NCP a role in the NAP design. This is not to say the NCP should be the lead designer or implementer - that may be appropriate in some cases, but not always, not least given NCPs’ already serious budget constraints. But NCPs have expertise and experience that can helpfully inform the NAP.

### Stage 3: NAP Implementation

Implementation is the final stage that is so often overlooked altogether, yet is key to realising results.

#### Recommendations

**1. Ensure the NAP itself establishes a clear plan for its own implementation.**

Writing an impactful NAP is one thing – implementing it is another. Yet far too often the latter is presumed as a natural and implicit result of the former, without any plans being established for how to ensure implementation. That is a critical gap that must be closed.

**2. Designate an empowered high-level authority to coordinate and oversee implementation.**

Often a driven individual in a government ministry helps spearhead development of a NAP, while too little attention and no senior leadership is given to ensuring ongoing oversight of implementation. This was the case for Peru, where once the Minister of Justice and Human Rights, the General Director for Human Rights, and the General Coordinator for the elaboration of the NAP left, the process went downhill (although broader political shift in Peru has also played a role). In other cases, oversight for implementation has been given, but to a government entity lacking authority to coordinate, or even track, necessary actions by other involved agencies. **France** might be an example here, which gave responsibility to its NHRI which lacked oversight enforcement authority. What is essential is ensuring a high-level expert authority is genuinely empowered to oversee implementation by all other involved agencies.

- 3. Ensure adequate budget and resources for implementation.** Meaningful commitments take money to implement, and it is critical that focus be given both to establishing a designated budget for implementation (as was missed in [Uganda](#)), and then actually funding the carry-through of NAPs, not only the drafting. This means the relevant agencies and ministries tasked with SMART commitments should be given money to carry them out. This point is relevant for state-drafters as well as the states and regional and international bodies that play a lead role in funding NAPs globally. These donor entities have tended to focus funding on the development of NAPs without giving due planning attention and financial support for funding implementation actions.
- 4. Ensure a robust awareness campaign.** One important thing the budget should fund is an awareness campaign amongst the public, impacted communities, human rights defenders, businesses, government agencies, and trading partners about the government's new commitments. This will involve outreach via numerous ministries and other actors, across various channels. But we add a warning here: it is also important that the budget not only be spent on extensive awareness-raising of NAPs, which is what allegedly happened in Kenya, rather than implementation of the actions.
- 5. Consider soliciting the NCP in supporting NAP implementation.** As we noted above, NCPs have expertise in business and human rights and may be well-placed to help ensure implementation of a NAP. The OECD Guidelines note that NCPs may "support efforts by their government to develop, implement, and foster coherence of policies to promote responsible business conduct." Where the NCP is not itself in need of serious reform and resourcing, it may be a helpful support in carrying out NAP commitments.
- 6. Set up inclusive and effective monitoring with transparency on (non) achievements.** A structured framework is needed to ensure public reporting on achievements under the NAP. Transparency is essential to allow meaningful evaluation and improvement. Once again, including diverse stakeholders in monitoring and measuring performance is essential, as impacted communities and workers and their representatives will have valuable insight into what has worked and not. A government implementation lead given proper oversight authority should be in a good position to follow-up on evidence of uncompleted commitments.
- 7. Ensure reporting to international bodies on implementation.** There is no global framework to register results of NAP implementation, but there should be. Establishment of an international reporting mechanism for NAP implementation measures, perhaps by a leading donor for NAPs, could help enable accountability for national implementation steps and outcomes.
- 8. Tie performance evaluations to fulfilment of commitments.** Relevant agencies could see their wider budgets tied strategically to achieving commitments assigned to them in the NAP, or risk losing access to funds for other desired programs. For

businesses, state benefits and incentives should explicitly be tied to companies' adherence to NAP commitments and broader human rights due diligence requirements applicable to companies. This should be detailed in the NAP itself, for example through establishing clear benefits and penalties in relation to, say, public procurement or other bidding for public-private partnerships.

- 9. Feedback for progress.** Any NAP will hit unexpected barriers, even if it meets all of the above steps. It is key that implementation and monitoring include a feedback loop to renew dialogue amongst the full stakeholder group on what has not worked and what else might instead.

### Leveraging a failed NAP

It's important to remember that a failed NAP can be a launch pad for something more effective – like a legislative process towards a mandatory human rights and environmental due diligence law. If the NAP didn't already include enough binding commitments, failed to include inputs from rightsholders, or otherwise appears effectively a bluewashing tool, this may provide advocacy grounds for civil society and other advocates to call for a new approach. Take Thai member Manushya Foundation's "Stop NApping" [campaign](#) as an example, calling for mandatory human rights due diligence and a binding treaty on corporate accountability.

We also emphasise that a NAP is not a necessary pre-requisite for forging ahead on individual impactful business and human rights-related reforms, including formation of binding corporate accountability law. In fact – we would tend to encourage governments to jump right from a baseline assessment to those more effective measures.

### OECD Watch support

The OECD Watch network hasn't traditionally engaged on NAPs because we focus on the OECD's responsible business standards. But hearing our global members' frustration and seeing the increasing reference to the Guidelines and NCPs in individual NAPs, we decided to speak out. As a secretariat:

- We will discuss these issues with the OECD's Working Party on Responsible Business Conduct and Network for NCPs, highlighting the role our members would like them to play.
- We will continue providing a global platform for members and other NGO partners to meet and share experience, best practice, and advocacy and solidarity actions on individual NAPs.
- We will do what we can to amplify members' calls for meaningful improvement of NAPs.
- We will also work with other partners, such as the Danish Institute for Human Rights, which offers guidance on NAP drafting and implementation, to help ensure our members' experiences and observations appear in their database and inform their capacity building exercises with governments and CSOs.

## Conclusion

NAPs have the potential to transform how governments align their national development plan with human rights obligations, by establishing meaningful and binding commitments on both governments and states to address harm from business activity and ensure access to remedy. But in practice, NAPs have regularly failed to live up to that potential, criticised for reasons related to their inadequate preparation, unambitious content and design, and weak implementation. Insufficient stakeholder engagement and transparency have also been leading problems.

In this report, civil society members and partners of the OECD Watch network have set out to identify the key barriers to effectiveness at each of those three stages. We have offered 25 recommendations to close the gaps. Our focus has been on promoting stakeholder engagement of impacted communities, workers, and defenders, on striving towards measurable and impactful (binding) commitments in NAPs, and on ensuring robust implementation, not only design and drafting. We have also, in particular, sought to highlight the growing nexus between NAPs and the OECD Guidelines and NCP complaint system, while offering recommendations relevant to strengthening synergies between NAPs and the OECD Guidelines. We hope our recommendations will be useful for civil society participating in NAP formation, for governments undertaking NAPs, and for other policymakers and donors that design and fund the creation of NAPs.

## About OECD Watch

OECD Watch is a global civil society network with more than 130 members in over 50 countries. We focus on empowering communities, workers, and NGOs to use the OECD's standards to ensure business activity respects human rights and the planet and companies are held accountable for their harms around the world. OECD Watch helps communities and NGOs file complaints and engage in advocacy towards governments and companies. We also conduct research and support policy advocacy at the OECD and individual countries to encourage more effective implementation of the Guidelines and closer alignment between the Guidelines and corporate responsibility laws.

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