

# Workshop report: The role of National Action Plans on Business and Human Rights in the EU as part of a smart mix of measures to enhance business respect for human rights

Brussels, 24 April 2026

## Contents

Introduction .....	1
Key findings and issues discussed .....	2
Annex 1: Survey results .....	5
Annex 2: Meeting Agenda and Concept note .....	7

## Introduction

The workshop was organised in the context of the implementation of the [EU Framework on Business and Human Rights](#), to reflect on the role and relevance of National Action Plans on business and human rights (NAPs) in the EU, notably in light of recent policy and legislative developments. It allowed participants to discuss their value as a complementary policy tool and gauge interest in potential mechanisms for enhanced coordination and mutual learning on NAPs at EU level. Participants also shared experiences, challenges, and lessons learned in the development and implementation of NAPs.

It was co-organised by the European External Action Service, the Belgian Ministry of Foreign Affairs, and the Danish Institute for Human Rights under the Chatham House Rule. Participants included representatives from EU Member State, EU candidate countries, international organisations, and national human rights institutions.

# Key findings and issues discussed

## 1. NAPs as a tool for policy coherence

- NAPs remain good **tools for coherence** in a crowded policy landscape. They facilitate horizontal coherence through inter-ministerial coordination, and national-regional-local coordination, in the implementation and implementation of actions. The institutional framework in developing and implementing a NAP really matters – it is important to have clearly defined roles, responsibilities, and feedback loops. NAPs also facilitate vertical policy coherence by providing a strategic bridge between EU and international standards and national implementation.
- NAPs provide a **policy anchor** to ensure continued strategic alignment between international frameworks such as the UN Guiding Principles on BHR and national action.
- NAPs can provide a **roadmap** to navigate and understand different BHR, RBC, ESG, Sustainable development frameworks and related expectations addressed to businesses, and the interlinkages and complexities of regulation addressing regulatory, trade and investment, PP, financial regulation etc.
- NAPs can **articulate practical measures** to support the transposition and implementation of EU legislation, such as around training and capacity building for stakeholders including SMEs, and to manage transition periods.
- The EU legislative developments have somehow slowed development of NAPs in the EU, but implementation of legislation can now **act as a catalyst** as it will require a supporting ecosystem. NAPs can also address **aspects not already covered**, or go deeper into aspects partially addressed, in EU legislation, such as businesses out of scope, civil liability, and provide a focus on emerging themes, such as technology and impacts on vulnerable and marginalised groups.
- NAPs can **articulate RBC incentives**, such as public procurement and export credit support
- There is a need to balance the strategic nature of a NAP as policy tool against ensuring practical action with targets and timeframes
- A NAP can address the position and needs of **SMEs** to navigate the evolving RBC landscape
- NAPs are static documents in nature but need to retain the **ability to adapt** to policy shifts and emerging HR risks

## 2. Need for increased implementation and accountability

- Implementation of NAPs is crucial to ensure their continued relevance and credibility. NAPs should move beyond aspirational objectives by placing greater emphasis on **concrete and effective implementation**.
- There is an increasing use of **SMART** (specific, measurable, achievable, realistic and time-bound) actions and indicators in NAPs.

- While many actions remain voluntary or commit to continued implementation of existing activities, they nevertheless **allow for movement** when political compromises on harder options are not yet feasible; they also raise visibility and bring people to the table, and provide space for discussion
- **Review mechanisms** are useful (e.g. Italy mid-term review, Germany NAP), as well as peer learning and sharing of experiences
- Certain actions and mechanisms can grow and **become self-standing** (e.g. inter-ministerial committees, multi-stakeholder working groups, sectoral dialogues and initiatives, helpdesks and trade support to businesses); ensuring the proper and sustained functioning of these coordination instruments is essential to the effectiveness and overall success of a NAP.
- **Further research** is needed to look at impact and effectiveness of NAPs on achieving better respect for human rights by business

### 3. Vital role of stakeholder participation

- NAPs provide a **forum to discuss** BHR issues, providing rooms to share different perspectives, and act as a bridge to different stakeholders
- Stakeholder participation is vital to ensure that actions respond to **reality on the ground**
- It is important to design **strategic engagement points** for stakeholder participation in the NAP development process, make it meaningful, and manage a range of feedback. Consideration should also be given on how to transition participation mechanisms in the development process to ensure participation during the implementation phase.
- **National Baseline Assessments** (NBA) are a useful tool to ensure the development process has solid foundations grounded in stakeholder participation. However, an NBA does not shortcut politics and the vital need to get political agreement.
- It is crucial to ensure **business engagement** – however despite attempts in different national context their participation in NAPs has often been sporadic. It is important to consider the possible gap between the positions of individual (often large) companies and business associations on RBC.

### 4. Non-EU countries, including accession countries

- NAPs can be an important tool for **EU candidate countries** to ensure alignment of their national frameworks with the UNGPs and EU RBC/BHR legislation, as well as other protections related to labour rights, occupational health and safety, environment, non-discrimination etc.
- The **EU can lead the way** in articulating how to develop second and third generations of NAPs, including by sharing good practices
- The EU and EU MS provide significant support to the development of **NAPs in non-EU countries**, and should lead by example by ensuring they have NAPs in place.

## 5. Political dynamics

- It is important for NAPs to be embedded in **strong national government systems**
- **Political will and ambition** are key to develop ambitious NAPs, moving beyond voluntary and pre-existing measures. Currently, backlash against human rights and supply chain due diligence is impacting on the political will to develop and adopt NAPs in some countries
- **Political and administrative changes** can impact on NAPs, especially as a well executed development process requires time and capacity, and implementation periods often outlive governments
- NAPs can help provide **“policy memory”** to navigate government transitions which impact on RBC policies.

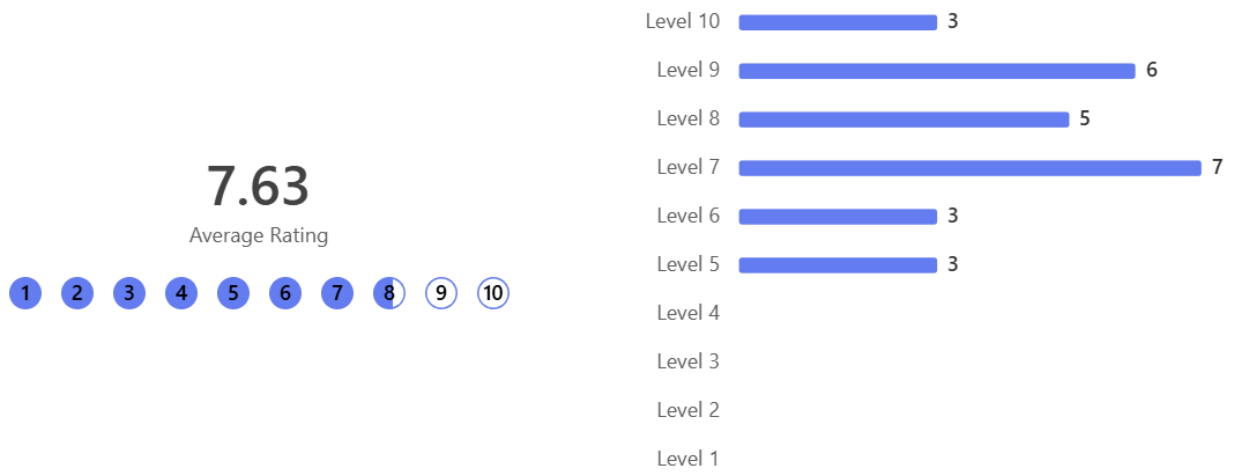
## 6. Possible follow up actions

- Ensure that National Action Plans on business and human rights **remain relevant** and continue to serve as a tool for policy coherence and coordination discussions.
- Continue **informal exchanges** on NAPs within the EU Expert Group on Business and Human Rights, focused on practical design and implementation challenges.
- Continue sharing good practices and engaging in **information exchanges with third countries** on NAPs.
- Identify **opportunities for further discussion** within existing multilateral fora, including the upcoming WEOG Regional Forum on Business and Human Rights (17-18 September 2026 in Strasbourg).

# Annex 1: Survey results

An anonymous survey was completed by participants. The results can be seen below.

1. How relevant/ useful are NAPs to advance business and human rights priorities? (1 low/ 10 high) (0 point)



2. How relevant/ useful are NAPs to implement EU responsible business conduct legislation? (1 low/ 10 high) (0 point)

[More details](#)



3. What are the main obstacles in the development and implementation of NAPs? (0 point)

[More details](#)

22  
Responses

Latest Responses

"In Belgium , NAPs need to involve different legislators and levels of powers, ... "  
"Access to remedy/Political issues"  
"Limited ressources, lack of efficient accoutability mechanisms"  
...

9 respondents (45%) answered Political for this question.

[Update](#)



4. What additional support/ research/ tools/ Community of Practice would you need to develop/ implement NAPs in your national context? (0 point)

[More details](#)

16  
Responses

Latest Responses

"/"  
"Solutions for collaboration"  
...

3 respondents (21%) answered EU for this question.

[Update](#)



# Annex 2: Meeting Agenda and Concept note

## Date & Time

- **09:30 – 13:30, 23 April 2026, Brussels. Location: Belgian Ministry of Foreign Affairs (Karmelietenstraat 15, 1000 Brussels).**
- **Format:** Hybrid workshop (Online & In-person). Chatham House Rule.

## Background and Rationale

In recent years, the EU has adopted a range of policies that contribute to advancing the business and human rights agenda as part of the EU broader set of initiatives on sustainability and Responsible Business Conduct.

As part of a “smart mix” of measures, most EU Member States have adopted National Action Plans (NAPs) on business and human rights, and some are in the process of updating them.

NAPs on Business and Human Rights are a key instrument to implement the UN Guiding Principles on Business and Human Rights (UNGPs) at the national level. Complementing legislative measures such in the area of due diligence and transparency that establish binding obligations for companies, NAPs can offer a flexible, strategic framework for governments to articulate their priorities, coordinate across departments, and engage stakeholders in advancing the UNGPs. They can also support the articulation of accompanying measures to facilitate the implementation of EU legislation, and articulate a range of actions to support businesses, including those outside the scope of EU regulations, respect human rights based on international standards.

EU Member States were frontrunners in the development of NAPs. While some Member States move to the development and implementation of second and third generation NAPs, others have not updated their inaugural NAPs, while some have yet to develop one.

As part of ongoing dialogue around the “[EU Framework on Business and Human Rights](#)”, which aims to promote coherence across EU policies and instruments in advancing the agenda, the European External Action Service (EEAS), the Belgian Ministry of Foreign Affairs and the Danish Institute for Human Rights (DIHR) are convening a workshop to reflect on the role of NAPs within in the EU.

## Objectives of the Session

The session will provide a space for discussion amongst peers to:

- Reflect on the role and [relevance of NAPs](#) in light of recent policy and legislative developments on Business and Human Rights
- Share experiences, challenges, and lessons learned in the development and implementation of NAPs

- Discuss practical ways to improve the execution of NAPs across Member States
- Discuss other possible processes or models that may have been developed
- Explore [best practices](#), including the use of [National Baseline Assessments](#) and [accountability mechanisms](#)
- Consider the potential for enhanced coordination and [mutual learning](#) at EU level
- Reflect on the role of NAPs and the EU Framework on BHR in supporting EU and Member States' external relations and engagement with third countries

### **Audience**

The primary audience are focal points from EU Member States responsible for business and human rights/ responsible business conduct/ National Action Plans on BHR.

National human rights institutions from EU Member States and key international organisations (CoE, OHCHR, OECD, OSCE) working on National Action Plans on BHR have also been invited to participate.

### **Expected Outcomes**

The session aims to foster reflections on renewed engagement with NAPs among EU Member States, highlight their value as a complementary policy tool, and gauge interest in potential mechanisms for enhanced coordination and mutual learning on NAPs at EU level.

### **Guiding Questions**

These guiding questions are designed to help you prepare for the two participatory sessions (see Agenda below). Please do not feel you need to have a response for all of them. You are also welcome to raise additional reflections not covered by these questions.

#### Session 1: NAP relevance and strategic value

1. What role can EU MS NAPs play in supporting/ complementing the implementation of responsible business conduct legislation (reflecting, *inter alia*, on the reduced scope of CSDDD/CSRD, import and market ban regulations, increased use of RBC provisions in EU trade and investment agreements)? What role do NAPs play in light of the simplification agenda/ reducing the regulatory burden on business?
2. What role do you see second/ third generation NAPs playing? What other possible models and processes have emerged?
3. What role can *EU MS NAPs* play in creating an enabling environment for the implementation of the UNGPs and mandatory human rights due diligence legislation in supply chains outside the EU?

#### Session 2: NAP development and implementation

1. What are the main challenges and lessons learned regarding NAPs in your national context (and more broadly)?

2. What is needed to ensure effective implementation of NAPs? How can you ensure that NAP development and implementation processes survive changes in government and evolving political priorities?
3. Can NAPs play a role in harmonising expectations across different ministries on responsible business conduct (foreign affairs, economy, labour, justice, environment)? How do the different ministries cooperate in your country on RBC? Should responsibility for the NAP lie with a single ministry or shared institutional leadership? If so, which?

## Agenda

Segment	Moderator/ lead	Duration	Timing
Introductory remarks	Ellis Mathews, Head of Division for Human Rights, EEAS Veronique Joosten, Director of Human Rights, Belgian MFA	15 mins	09:30 – 09:45
Quick introduction by participants	All	15 mins	09:45 – 10:00
Overview of global NAP trends	Elin Wrzoncki, Department Director, Human Rights Business and Technology, DIHR Daniel Morris, Senior Adviser, DIHR	20 mins	10:00 – 10:20
Session 1: NAP relevance and strategic value <ul style="list-style-type: none"> <li>- Breakout discussion</li> <li>- Feedback in plenary</li> </ul>	All	50 mins	10:20 – 11:10
Coffee break		20 mins	11:10 – 11:30
Case studies from EU Member States <ul style="list-style-type: none"> <li>- Belgium</li> <li>- Italy</li> </ul>	Eva Nullens, Human Rights Officer, Belgian MFA Cristiana Carletti, Professor of International Public Law, PhD, Roma Tre University	30 mins	11:30 – 12:00
Session 2: NAP development and implementation <ul style="list-style-type: none"> <li>- Breakout discussion</li> <li>- Feedback in plenary</li> </ul>	All	50 mins	12:00 – 12:50
Concluding remarks	Mauricio Lazala, Chief, Business and Human Rights Section, OHCHR Michaela Dodini, Policy officer for Human Rights, EEAS	10 mins	12:50 – 13:00
Sandwich lunch		30 mins	13:00 – 13:30