



Business at OECD Comments on the Workplan for the Inclusive Platform on Due Diligence Policy Co-operation

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- *Business at OECD* (BIAC) welcomes the proposed workplan for the Inclusive Platform on Due Diligence Policy Co-operation and reiterates its strong support for this initiative. We see significant potential for the Platform to foster greater international cooperation, facilitate exchanges between policymakers and practitioners, and contribute to a more coherent, effective and proportionate policy environment for responsible business conduct (RBC).

Prioritising policy coherence, regulatory interoperability and measurable outcomes

- Among the priorities identified in paragraph 3, **promoting greater policy coherence between OECD adherents and non-adherents is of particular importance to the business community**. Companies operating across international markets face an increasingly complex landscape of binding regulations, voluntary standards, reporting frameworks and due diligence expectations. These requirements can differ in scope, terminology, implementation and enforcement, creating unnecessary complexity and costs for companies operating across multiple jurisdictions.
- Against this background, the Platform should prioritise **regulatory interoperability**, ensuring that different national and regional approaches can work together effectively, building on internationally recognised OECD RBC standards while avoiding unnecessary duplication, fragmentation and conflicting requirements. This is particularly important for companies operating through complex global value chains, including SMEs that may face indirect compliance requirements through their business relationships. We encourage the OECD to map directly conflicting legal requirements across jurisdictions and propose practical solutions for governments, including common definitions and interoperable reporting approaches.
- This objective is closely aligned with the priorities identified in *Business at OECD's 10 Lessons Learned from 50 Years of Responsible Business Conduct – A Business Perspective*, notably the need for greater policy coherence, proportionality and practical implementation of RBC standards. It also complements the OECD's *Simplifying for Success* initiative, which seeks to reduce unnecessary regulatory and administrative complexity while preserving policy effectiveness.
- In this context, BIAC particularly welcomes the workplan's emphasis on evidence-based policymaking and measuring the uptake, effectiveness and impact of due diligence policies. **Assessments should go beyond formal compliance and reporting requirements to measure real-world outcomes**, including improvements for workers, communities and the environment, alongside the administrative costs, operational burdens and economic implications for companies. Such evidence is essential to determine whether



regulatory approaches are delivering their intended objectives efficiently and proportionately. Impact assessments should also examine supplier capacity-building, remediation, risks of disengagement and effects on investment in higher-risk markets.

Given the importance of these objectives, **Business at OECD calls on governments to provide adequate and sustained funding for the Platform**, enabling it to deliver meaningful analytical work, support inclusive international participation and generate practical results for policymakers and businesses alike.

Strengthening the workplan through concrete deliverables

- While welcoming the proposed activities, BIAC believes that the workplan would benefit from a **clearer identification of concrete deliverables**, organised around successive work cycles with indicative timelines and expected outputs. This would help focus discussions, ensure continuity between meetings and allow participants to assess progress and results.
- In this regard, we strongly support the proposed development of short, targeted policy briefings on key due diligence concepts as outlined in paragraph 24. These should provide practical, accessible guidance on specific implementation challenges, rather than adding new layers of expectations.
- **Responsible disengagement** would be a particularly valuable topic for an initial briefing, given the practical challenges companies face in determining when and how to disengage responsibly from business relationships. *Business at OECD* would be ready to contribute its expertise and mobilise business practitioners to support the development of such a briefing. Any briefing on this topic should distinguish between sectors and commercial relationships, as well as highlight businesses' flexibility to engage, remediate or disengage according to the circumstances.

Ensuring meaningful stakeholder engagement

- *Business at OECD* welcomes the references to consultation with stakeholders and business practitioners throughout the workplan. However, we believe that **the three institutional OECD stakeholders and relevant business practitioners should be able to participate in and actively contribute to the vast majority of Platform meetings**, including through direct interaction with government representatives.
- Such engagement is essential to ensure that policy discussions are informed by practical implementation experience, including the operational realities, costs and unintended consequences of due diligence requirements. Direct exchanges between policymakers and business practitioners can help identify workable solutions, anticipate implementation challenges and strengthen the effectiveness of policy design.
- While recognising that certain government-only exchanges may be appropriate, these should remain the exception rather than the default approach.



Ensuring efficient organisation of thematic sub-groups and communities of practice

- *Business at OECD* sees merit in the proposal to establish thematic sub-groups or communities of practice, particularly as discussions within the Platform become increasingly technical and require more focused exchanges on specific implementation and enforcement challenges.
- However, we would caution against creating additional meeting structures that could increase the already substantial demands on Delegates' time and resources. The OECD RBC landscape already includes numerous specialised meetings and initiatives, including the OECD Forum on Responsible Mineral Supply Chains and the OECD Forum on Due Diligence in the Garment and Footwear Sector.
- **We therefore recommend that meetings of any new sub-groups or communities of practice be organised strictly in conjunction with the regular meetings of the Inclusive Platform**, rather than as additional stand-alone events. This would facilitate participation, minimise duplication and promote synergies between discussions. These should also be demand-driven and fill a gap in existing work areas, including those that occur outside of the OECD. This would facilitate participation, minimise duplication and promote synergies between discussions. New work should complement existing sectoral guidance and avoid duplicating initiatives already underway inside or outside the OECD.

Clarifying the workplan's timeframe

- Finally, we note a minor inconsistency regarding the proposed timeframe. Paragraph 4 refers to a workplan covering **2027-2029**, whereas paragraph 7 describes a **24-month period covering 2027-2028**. We would welcome clarification to ensure consistency throughout the document.

Business at OECD reiterates its support for the Inclusive Platform and its proposed workplan. We encourage the OECD and participating governments to maintain a strong focus on policy coherence, regulatory interoperability, practical deliverables and evidence-based assessments of both outcomes and costs.

With adequate resources and meaningful stakeholder engagement, the Platform can make an important contribution to simplifying the international RBC policy landscape while strengthening the effective implementation of responsible business conduct standards.



Business at OECD Comments on the draft agenda for the 4th meeting of the OECD Inclusive Platform

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- Business at OECD welcomes the overall plan for the next OECD Inclusive Platform on Due Diligence Policy Co-operation meeting in March 2027. We particularly appreciate the practical focus of the draft agenda and would like to highlight the following points:
 - **Risk-based and proportionate due diligence:** We welcome the recognition that full supply chain traceability is not always feasible or necessary and encourage the OECD to further promote realistic, risk-based regulatory expectations.
 - **Reducing complexity and compliance costs:** We support the focus on improving access to credible and affordable supply chain data. The discussions should also identify concrete ways to improve interoperability, avoid duplicative reporting and reduce burdens on SMEs.
 - **Business engagement and practical solutions:** We welcome the proposed discussions on AI, digital tools and stakeholder engagement. We encourage the OECD to actively involve business practitioners in these sessions and prioritise actionable recommendations and measurable outcomes.

Business at OECD Comments on the RBC Due Diligence Work Plans 2027-2030

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- Business at OECD welcomes the proposed RBC Due Diligence Work Plans for 2027-2030. We support their focus on practical implementation, policy coherence and measurable outcomes. The work should build on existing OECD guidance and respond to operational challenges identified in our BIAC report “Ten Lessons Learned from 50 Years of Responsible Business Conduct” that we published in June 2026.
- **First point on this document is about connecting RBC more closely with economic security.** We encourage the OECD to strengthen the link between responsible mineral sourcing and its broader economic security agenda. Critical minerals are essential to industrial competitiveness and strategic resilience. The OECD should use its expertise in due diligence, trade data and supply chain analysis to identify strategic dependencies, support sourcing diversification and assess disruption risks.



- **Second priority from a BIAC perspective is that the WPRBC focuses its work on reducing regulatory complexity and conflicting requirements.** The OECD should use the Inclusive Platform and sector-specific work to identify overlapping or contradictory due diligence obligations. It should propose common definitions, interoperable reporting frameworks and recognition of credible industry initiatives. Particular attention should be paid to SMEs and conflicting requirements across jurisdictions. The OECD should avoid adding expectations where existing guidance could be implemented more effectively.
- **Third priority for the WPRBC is to measure tangible outcomes and unintended effects.** The OECD should assess actual improvements for workers, communities and the environment, rather than counting only reports, audits or disclosures. Research should also examine implementation costs, supplier capacity-building, remediation and potential disengagement from higher-risk markets.
- **Last but not least, we call on the WPRBC to develop practical, sector-sensitive guidance with business practitioners.** The OECD should pilot new tools with companies and industry associations before publication. Guidance on responsible disengagement should reflect different business models, supplier relationships and risk profiles. New work should complement existing sectoral resources and avoid duplication.