



# Powering change together

International RBC Agreement for the Renewable Energy Sector  
*Integrating sustainability and human rights in the energy transition*

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## Foreword | Kees Vendrik

### *‘From Promise to Practice’*

The renewable energy sector plays a unique role in today’s world. It not only provides the foundations for a climate-neutral economy but also shows how that future can be shaped in a responsible way. In this sector, sustainability comes to life—through innovation, through collaboration, and through the will to do what is right.

Responsible business conduct is not an afterthought, but a fundamental part of building a sustainable future. The [International RBC Agreement for the Renewable Energy Sector](#) provides companies with practical support, access to knowledge, and concrete tools to help them comply with national and European regulations. More importantly, it offers a framework through which we can work together towards a lasting change. At the European level too, there is growing attention to strategic autonomy and responsible raw material policies. This creates a favourable wind for what we are building together here.

In its second year, this Agreement has deepened and broadened. That is essential. Many of the challenges in the chain extend beyond the influence of individual companies. Only together—companies, government, NGOs, trade unions and knowledge institutions—can we truly make supply chains more sustainable. We are seeing the government take a more active role: through tender requirements, policy instruments and international cooperation.

The number of participants in the Agreement is growing. The conversations are becoming more pointed, and ambitions more concrete. The baseline assessment has been carried out, offering companies insight into where they stand and

pointing them where to go. These insights help businesses set priorities and strengthen their approach. In knowledge sessions, working groups and collective projects, parties are bringing principles and practice together. And above all: An active community is emerging, in which companies, civil society organisations, government and knowledge institutions come together to learn from one another, to move forward together, and to make a real difference in practice.

That is no simple task. The dependence on critical raw materials—often sourced from vulnerable regions—and growing geopolitical tensions are putting pressure on companies. But within this dynamic, something powerful is also emerging: new technologies, circular approaches, and creative forms of collaboration. The sector is increasingly proving itself a cradle of innovation—not only technically, but also in how we work together towards a just transition.

Experience shows that companies cannot do this alone. The Agreement provides a safe and productive space to take responsibility and to ask questions. Where do the social parties involved put their finger on the sore spot? Where do the limits of possibility lie? Where are policy decisions from governments needed? And how can we jointly find solutions that truly work—on the ground and across the chain? The Agreement also highlights where companies rely on government support—whether through clear regulation or strategic policies on raw materials. In this way, it becomes a tool for the government to align policy with practical realities.

That reciprocal character is of great value. For companies, it means: Share the challenges you face, learn from others, and show where you are making progress. Because the world is watching. The renewable energy sector is under the spotlight—not only because it is essential to achieving climate goals, but also because it symbolises how we can connect economic progress with ethical responsibility. The Agreement makes visible that companies are not only part of the solution but are also willing to take responsibility in concrete ways.

My message to all the partners is this: keep moving. Keep investing in insight, collaboration and improvement. Use the Agreement as a lever for tangible progress. That's how we turn promises into practice—and ambitions into impact. And a thank you to all for the productive collaboration that characterises our Agreement!

*Kees Vendrik,  
chair of the International RBC Agreement for the Renewable Energy Sector*







# About the Agreement

## About the International RBC Agreement for the Renewable Energy Sector | uniting for impact



Accelerating the use of renewable energy is key to achieving global goals for a green and sustainable economy. However, producing, installing and deploying the renewable energy technologies involve risks for people, nature and biodiversity. The supply chains of such green technologies are complex and often lack the necessary transparency to enable the effective identification and mitigation of the associated impacts.

Through the [International RBC Agreement for the Renewable Energy Sector](#), the signatories aim to increase transparency in renewable energy technology supply chains and to - both collectively and individually - take concrete steps to address potential and actual adverse impacts therein.

The Agreement outlines collective and individual commitments for participating organisations. These include companies, industry associations, trade unions,

NGOs, knowledge institutions, the Dutch government and other relevant bodies, such as contracting authorities and renewable energy technology platforms. In this Agreement, the companies commit to applying recognised international responsible business conduct standards throughout their operations in the renewable energy sector; particularly with respect to wind and solar energy technologies. The applicable international standards are the [OECD Guidelines for Multinational Enterprises](#) and the [UN Guiding Principles on Business and Human Rights](#). The other Parties commit to support and monitor the efforts of the companies, and to actively promote the broader adoption and the integration of responsible business conduct in the energy transition in their respective contexts.

The Agreement aspires to scale up in terms of numbers and (geographical) diversity and undertakes outreach activities with the aim of raising awareness about the Agreement. The higher the number of participants, the greater the combined leverage of the signatories for realising positive impact in the supply chain. The Agreement is therefore open to relevant organisations, initiatives and companies active in different nodes of the renewable energy supply chain that endorse its goals and aspirations at the national and European level.

The Agreement is effective from May 1, 2023, for a five-year term. The Social and Economic Council (SER) serves as the Agreement's secretariat, facilitating its implementation and coordination.

### Want to learn more?

Check out the [brochure](#) or the [executive summary](#).



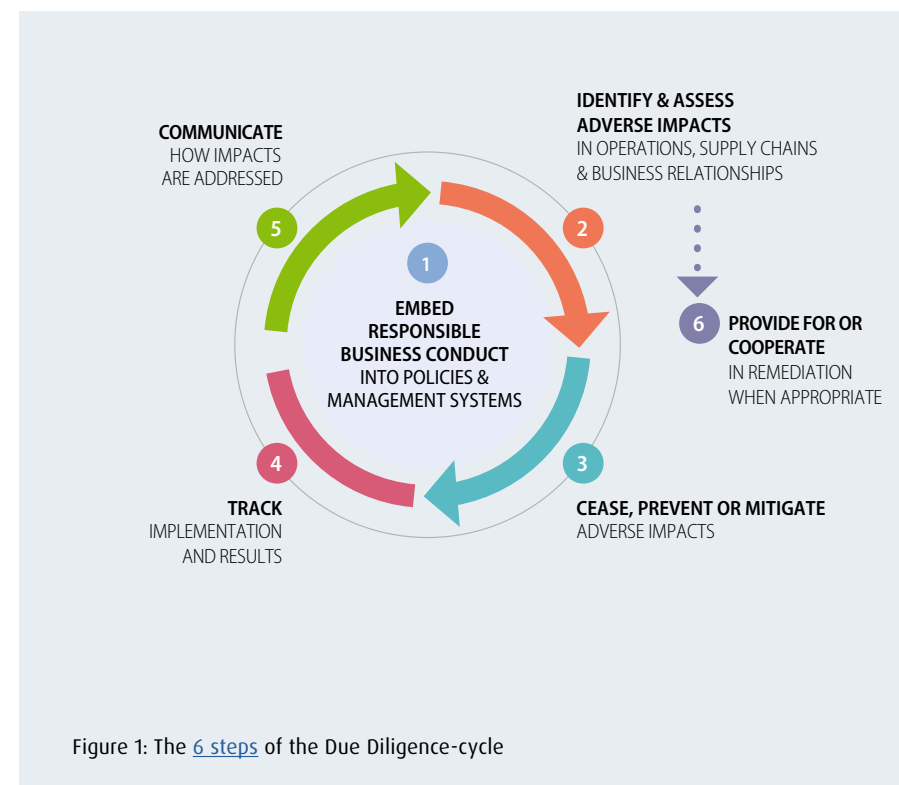
## Understanding the due diligence process

Some business activities, products, or services inherently carry risks due to their potential to cause or contribute to negative impacts on people, the environment and the planet. In other instances, while the business itself may not present immediate risks, external factors—such as weak governance, inadequate enforcement of standards, or the actions of business partners—can create challenges that may lead to adverse impacts.

Through conducting due diligence, businesses can proactively identify, prevent, mitigate and remedy such risks. Due diligence helps businesses to have supply chain resilience and address risks. In certain cases, where the potential for harm is too significant or mitigation efforts prove ineffective, businesses may need to reconsider or discontinue specific operations or relationships to uphold sustainability goals and minimize negative impacts.

Due diligence is a continuous process and involves the following six steps (see figure 1):

- 1 Embedding responsible business conduct into policies and management systems
- 2 Identifying and assessing adverse impacts in operations, supply chains and business relationships
- 3 Ceasing, preventing or mitigating adverse impacts
- 4 Tracking implementation and results
- 5 Communicating how impacts are addressed
- 6 Providing for or cooperating in remediation, when appropriate



### For more information:

[Guidelines for MNEs - Organisation for Economic Co-operation and Development Due Diligence Handleading](#) (Dutch language), published by the SER.





## Year 2 in brief



## Year 2 in brief | five major results

In the second year of the [International RBC Agreement for the Renewable Energy Sector](#), the parties focused on developing due diligence tools, joining forces in collective actions and impact projects, and sharing knowledge and expertise with each other. The second year delivered the following five key results:

- The first comprehensive baseline assessment of the companies was completed. Based on the [assessment results](#), the Secretariat compiled a monitoring gap analysis for the wind and solar sectors. This aggregated and anonymised analysis provides insight into the companies' due diligence performance, identifies key gaps, and includes other relevant supply chain information. The gap analysis is expected to be used by parties in further refining both individual and collective due diligence actions in the coming years. The Secretariat also compiled a document on [Monitoring Good Practices](#), identifying over 50 examples of effective due diligence in the wind and solar sectors.
- Parties initiated three collective projects in Year 2:
  1. **Peru Copper Project** – Aims to integrate artisanal and small-scale copper mining in Peru into formal, globally responsible supply chains.
  2. **Worker Welfare Project** – Parties jointly developed a range of tools to identify, address, and remedy adverse worker rights conditions at wind and solar energy project sites in the Netherlands and Europe.
  3. **Worker Voice Research Project** – Focuses on human rights due diligence on manufacturers of PV modules and inverter components based on worker perspectives.Several other collective projects, research efforts, and joint actions are underway or under development.
- The number of signatories of the International RBC Agreement for the Renewable Energy Sector grew from 52 to 57 organisations, including 38 companies. See the full list of [participants](#).



- Secretariat and parties jointly developed 3 sets of tools:
  1. **Due diligence toolbox for beginner companies** – Includes practical tools and templates to help companies start their human rights and environmental due diligence process.
  2. **Due diligence toolbox to address forced labour** – Provides guidelines and action steps to help companies identify and address forced labour in their supply chains.
  3. **Worker welfare toolbox** – Developed as part of the Worker Welfare Project, this toolbox supports companies in identifying, addressing, and remedying adverse working conditions at wind and solar energy sites.
- Parties engaged with each other through several knowledge-sharing sessions, trainings, peer learning and 'intervision' sessions (structured group reflection). The parties took part in outreach activities within the Netherlands and beyond to increase awareness about the Agreement.

These results are described in more detail in the following chapters.



An aerial photograph of a wide river bend. A large, forested island sits in the middle of the river. The left bank is covered in dense green trees. A wide, light-colored gravel bar is visible in the center of the river bend. A teal-colored rectangular overlay is positioned on the left side of the image, partially covering the river and the forested bank. The text "Cooperation and action" is written in white on this teal background. A white line with a rounded corner highlights a specific area on the forested island.

# Cooperation and action



## Cooperation and action | core areas and associated goals

The signatories of the Agreement work together to address the following core areas and achieve associated goals:

1. **Individual Company and Collective Due Diligence:** Supporting and monitoring the efforts of companies to improve their human rights and environmental due diligence practices. This also includes exploring practical ways to incorporate RBC requirements in procedures for wind and solar farms (permits).
2. **Collective Projects and Increasing Collective Leverage:** Initiating impactful projects and activities to address human rights and environmental risks in the supply chain that individual companies cannot tackle alone. The aim is to increase the collective influence of the solar and wind energy sector and generate positive impact in their supply chains.

To achieve these goals, the following working groups and sub-groups are in place:

- **Working Group on Due Diligence:** This group is mandated to develop due diligence tools and templates in collaboration with the Secretariat, to distil lessons and opportunities for collective due diligence, and to align the overall process with recognised international due diligence processes and guidelines. The Working Group on Due Diligence also includes a sub-group on Tender and Procurement Processes which focuses on practical ways to incorporate RBC requirements in procedures for wind and solar farms (permits). In 2024, parties have decided to organise intervision and peer-learning sessions relevant and open to all parties, rather than holding meetings solely for the sub-group.
- **Working Group on Collective Action and Increasing Leverage:** This group is mandated for recruiting new parties and initiating, implementing and supporting collective positive impact projects.

In addition to the above-mentioned two core working groups, there is also Working Group on Communication which meets on an ad-hoc basis. This group is responsible for developing and implementing actions related to both internal and external communication about the Agreement and its deliverables.

The Agreement also includes the Renewable Energy Complaints and Disputes Committee which facilitates access to remedy for affected stakeholders.

The following paragraphs outline the actions taken and results achieved in each core area.



Due Diligence | individual company and collective due diligence

The Working Group on Due Diligence is responsible for developing due diligence tools and templates in close collaboration with the independent Secretariat. The group also distils lessons learned and identifies areas for collective due diligence, based on the Secretariat’s analyses and reports. In addition, the Working Group, together with the Secretariat, ensures alignment with internationally recognised due diligence processes and guidelines.

The following activities were undertaken by the Working Group on Due Diligence during implementation Year 2:

Due diligence assessment of signatory companies

Purpose of the assessment

The Agreement has a yearly due diligence assessment process. This process enables measurement and understanding of how companies conduct risk-based due diligence as prescribed by the [OECD Due Diligence Guidance for Responsible Business Conduct](#). As the assessment is conducted annually, it also allows tracking of progress at both the company level and, in aggregated and anonymised manner, at the sector level. This helps parties to evaluate how the Agreement supports companies in improving their due diligence practices. In addition, by identifying their due diligence gaps, the assessment helps companies identify gaps in their current approach and prepare for upcoming due diligence legislation.

Assessment process

The assessment is based on the [Renewable Energy Sector Due Diligence Assessment Framework](#), which was developed by companies, civil society organisations, trade unions and the Dutch government during the first year and approved by the Steering Committee of the Agreement. The independent

Secretariat of the Agreement conducted the first round between March and July 2024. This first assessment is referred to as the baseline assessment, as yearly progress will be measured based on these scores.

The assessment consisted of three stages:

- **Completing a maturity assessment questionnaire**, which consists of [44 questions](#) that assesses companies’ due diligence performance: Participating companies completed this questionnaire in March 2024. The answers to the questionnaire were subsequently assessed and validated by the Secretariat.
- **Developing an individual due diligence action plan**, outlining concrete targets for companies to improve their performance in the following year: Companies developed and shared their individual company due diligence action plan with the Secretariat.
- **Bilateral conversations between the Secretariat and companies**: These conversations were held between the Secretariat and those responsible for relevant functions of the company (e.g. for sustainability, procurement, supply chain, management etc.) and discussed the current due diligence process and assessment results of the given company and included practical recommendations for future improvement.

Based on their score in the assessment, participating companies were classified into the following categories:

Category	Company’s score in percentage of total achievable score
Leader	81-100%
Advanced	61-80%
Intermediate	41-60%
Improving	21-40%
Beginner	0-20%



Due diligence assessment results

Signatory companies were scored based on the assessment results. Individual company scores are confidential. The table below shows the sector scores per due diligence step:

	Final score %	Due Diligence Step 1 %	Due Diligence Step 2 %	Due Diligence Step 3 %	Due Diligence Step 4 %	Due Diligence Step 5 %	Due Diligence Step 6 %
Wind sector	69%	78%	65 %	66%	67%	85%	57%
Solar sector	33%	40 %	37 %	35 %	25%	23%	17%

Wind sector

The average baseline assessment score for wind sector companies was 69%. Out of the assessed companies in the wind sector, 0 scored as “Beginner”, 1 scored as “Improving”, 6 scored as “Intermediate”, 9 scored as “Advanced” and 6 scored as “Leader”:

Category	Company’s score in percentage of total achievable score	Number of companies
Leader	81-100%	6
Advanced	61-80%	9
Intermediate	41-60%	6
Improving	21-40%	1
Beginner	0-20%	0

The assessment showed that wind sector companies had a strong focus and well-developed policies and systems for issues such as occupational health and safety and for implementation of projects. The sector scored the highest on

due diligence step 5 (communicating how impacts are addressed) which can be explained by the preparations of the sector for the implementation of the Corporate Sustainability Reporting Directive. The wind sector scored the lowest on due diligence step 6 (providing for or cooperating with remediation when appropriate). The experience with other RBC Agreements show that companies begin advancing in due diligence step 6 as they mature in due diligence processes. This can also explain why the sector has scored lower in this step. Nonetheless, the sector has aspirations to improve its performance on all 6 steps of the due diligence cycle in the coming years.

Solar sector:

The average baseline assessment score for solar sector companies was 33%. Out of the assessed companies in the solar sector, 4 scored as “Beginner”, 5 scored as “Improving”, 1 scored as “Intermediate”, 1 scored as “Advanced” and 1 scored as “Leader”.

Category	Company’s score in percentage of total achievable score	Number of companies
Leader	81-100%	1
Advanced	61-80%	1
Intermediate	41-60%	1
Improving	21-40%	5
Beginner	0-20%	4

The assessment showed that, except for some companies, many solar sector companies were still in the beginning of their due diligence journey due to their relative smaller size and capacity. There was a wide variation in their due diligence scores, which could also be explained that not all of these companies had dedicated people working on responsible business conduct. The solar sector



scored the highest on due diligence step 1 (embedding responsible business conduct into policies and management systems) and on step 2 (identifying and assessing adverse impacts). Similar to wind sector companies, solar sector companies also scored the lowest on due diligence step 6 (providing for or cooperating with remediation when appropriate).

The differences between wind and solar sector results are due to considerable differences in supply chain structure, company size, due diligence maturity and available resources of the companies in the wind and solar sector, which makes it difficult to compare the two sectors. As such, the assessment showed that parties needed to have a different approach towards wind and solar sector companies when providing due diligence support.

### Has the assessment helped companies?

In 2025 Secretariat conducted a survey to understand how different Agreement activities (sessions, tools, the assessment process etc.) supported companies. In this survey, several companies, indicated that the assessment process helped them to have an overview of all the topics and to understand what they were doing well and where further improvement was needed.

### Assessment next steps:

Based on the baseline assessment round, the Secretariat developed a gap analysis, which provides the parties with insight and information in order for them to develop a collective due diligence support programme.

The Secretariat also compiled [good practices](#) from the sector. This resulted in more than 50 human rights and environmental due diligence practices from the wind and solar sector that can serve as inspiration for companies.

During the assessment process, the participating companies developed and shared action plans with the Secretariat in which they have outlined concrete

steps they plan to take to improve their due diligence practices. Implementing measures contained in the action plans will help companies to improve their assessment scores in the subsequent year.

The next assessment cycle will take place in spring-summer 2025 and will show the progress made by the wind and solar sector.

### Due diligence tools

The Agreement's assessment process showed that companies within the Agreement vary in their due diligence maturity levels. Some of them are advanced, while others are still at an early stage of their due diligence journey.

During the assessment interviews, many companies indicated that they lacked the necessary tools and knowledge for conducting due diligence. For this purpose, in the second year of the Agreement the Secretariat and participating parties joined forces and developed due diligence tools. These tools can be used both by larger companies, as well as by SMEs. Several companies of the Agreement have already started using these tools in their due diligence journey. Some of the tools are also being used by the parties outside the Agreement. Parties hope these tools will equip companies with the needed capacity to identify and address adverse human rights and environmental impacts in their operations and value chain.

While the focus of implementation Year 2 was on development of tools, during the next implementation year, the Secretariat and parties will focus on supporting companies in understanding and implementing these tools in their operations and value chain. The Secretariat will do this through different sessions where parties will receive explanations and demonstrations on how they can utilize them, as well as during the bilateral monitoring meetings where companies will be assisted to find the best fit-for-purpose tool for their due diligence challenges.

Below you can find a summary of the three due diligence toolboxes developed under the Agreement.

## 1. Due diligence toolbox for beginner companies

This toolbox is aimed to equip companies with necessary practical instruments to start their sustainability journey. It can be used by companies which are in the beginning stage of human rights and environmental due diligence. Other companies can also share these tools with their suppliers and business partners in order to support their due diligence.

During the second implementation year of the Agreement, already several SMEs of the Agreement have started utilising these tools in their due diligence journey. See for instance, [ESG policy](#) of Biosphere Solar.

The toolbox includes the following documents:

- [Human rights policy template](#): this can be used by companies to embed human rights in their organisation.
- [Environmental policy template](#): this can be used by companies to embed environment and biodiversity in their organization.
- [Code of Conduct for business partners](#): this contains a list of expectations on human rights, environment and biodiversity that companies can ask from their suppliers and business partners.
- [Supplier Assessment Questionnaire](#): this could be used by companies to assess their suppliers and business partners on due diligence. The questionnaire is aligned with the above-mentioned Code of Conduct for business partners.
- [Heat map for adverse impact prioritization](#): this tool can be used by companies to prioritise different adverse impacts on likelihood and severity.
- [Sustainability Reporting Outline](#): this tool is designed to support companies to start reporting on due diligence in line with the OECD Guidelines for Multinational Enterprises.



- [Guidance on Addressing biodiversity for downstream companies](#): this document provides step-by-step guidance for companies that want to start addressing biodiversity in their operations, projects and supply chain.

## 2. Due diligence toolbox to address forced labour

In the renewable energy sector, forced labour can occur in the operations and supply chains of companies. This toolbox aims to equip companies with necessary knowledge to address these topics within their organisation and with their business partners.

The toolbox to address forced labour is a living document and is regularly updated to reflect the developments.

The toolbox consists of the following tools:

- [Practical action steps for companies on human rights due diligence when sourcing solar panels](#): this guidance document contains 11 steps that companies can implement within their organisations.



- Guidance on engagement with suppliers on forced labour: this document provides step-by-step instructions on how to engage with business partners on the topic of forced labour.
- Training material on forced labour: companies can use the training material when conducting trainings within their organisations on forced labour.

### 3. Due diligence toolbox on worker welfare

This toolbox, developed within the worker welfare project (see also page 21), consists of 20 different tools, designed to equip companies with necessary knowledge to identify, address and remedy adverse worker welfare conditions in renewable energy sites.

The toolbox has been shared with a number of stakeholders during the public consultation period. Secretariat has received positive feedback on the toolbox. A number of companies within and outside the Agreement have volunteered to pilot these tools in their due diligence practices throughout 2025. Secretariat will evaluate this early in 2026.

The toolbox consists of the following tools:

- Principles for worker welfare on renewable energy sites: This contains a code of conduct for suppliers on worker welfare.
- Compilation of Collective Labour Agreements: this refers to the conditions on wages, working hours, and leave in the collective agreement(s) relevant for the works or services. This compilation assists in determining which agreement is relevant.
- Training for Internal Staff on Worker Welfare: this training is intended to raise the internal staff's awareness of issues regarding worker welfare, including red flags, and train them in the use of the Worker Welfare Toolbox.
- Complaints Procedure template: This is a template (in line with the UNGP's eight effectiveness criteria) providing an instruction on how to handle the complaints received through the notification mechanism, including roles and

responsibilities. The annex to the template contains default messages for communications with complainants.

- Notification Mechanism template: This template (in line with the UNGP's eight effectiveness criteria) is designed to be inserted in a digital platform so as to ensure anonymity and confidentiality.
- Training for internal staff on grievances and remediation: This training is intended to raise the internal staff's awareness of dealing with grievances and remediation (including the UN's eight effectiveness criteria) to ensure proper implementation of the complaints procedure and the notification mechanism.
- Pre-qualification questions: This tool aims to assess whether a contractor has adequate worker welfare practices in place, covering all principles. The evaluation leads to a pass or fail result, which determines if the contractor can be included in a tender.
- Award criteria: This tool helps to differentiate between contractors who have passed the pre-qualification. It focusses on the risks of forced labour, especially for migrant workers.
- Pricing plausibility checklist: This tool is designed to help ensure that the pricing of works and services is plausible, transparent, and sufficient to ensure worker welfare (working time, adequate wages, health and safety, adequate housing, water and sanitation etc).
- Employer's requirement: This tool outlines and defines contract requirements, including the Worker Welfare Principles, training on worker welfare, working conditions in line with collective agreements, verification of workers' legal status and registration, workers' access to worker welfare information, employer's monitoring, prevention.
- Risk Assessment, including Action Plan and Remediation Plan: This template can be used to assess the risks and develop appropriate measures at a project or sector level.
- Contractor Mapping Template: This template is designed to assist companies to map contracts and labour providers on renewable energy sites in order to identify general areas where adverse impacts are most likely to occur and expected to be most severe.

- [Training for Contractors and Labour Providers on worker welfare](#): This training intends to raise the awareness of contractors and labour providers regarding worker welfare, including how to spot the signs of abuse.
- [Microlearning for workers on worker welfare](#): This training for workers is intended to raise their awareness of their rights, and to provide information about national helplines and notification mechanisms.
- [Leaflet and Poster for workers](#): This leaflet and poster are meant to be used to raise workers' awareness of their rights and provide information about national helplines and notification mechanisms.
- [Worker voice survey](#): This template can be inserted in a digital tool enabling workers to provide anonymous feedback on their working conditions, e.g. prior to an audit.
- [Pre-audit document request](#): This template can be used for requesting documents such as contracts, wage slips and time reports prior to an audit.
- [Inspection and audit checklist](#): This template can be used during audits and includes questions for managers and workers, red flags and guidance, as well as corrective action plan.
- [Engagement on \(severe\) adverse impacts](#): Companies can use this tool to engage with contractors and labour providers once a (severe) adverse impact has been identified.

In early 2026 the Secretariat will conduct a survey to understand how companies have utilized these tools and what lessons were learned.

### *Knowledge sessions, peer learning and trainings*

The Agreement brings together a wide range of parties. Collectively, they bring substantial knowledge and expertise. For instance, trade unions offer deep insights into working conditions in different countries; civil society organisations can advise on different human rights and environmental topics; the government

can share knowledge on implementation of different due diligence legislation; companies share good practices with each other. The Agreement serves as a platform for all these parties to share their knowledge and learn from each other. Not only companies benefit from the expertise of civil society organisations and the government; through the Agreement, civil society organisations and government also understand specific challenges faced by the sector, which can help them shape their policies and activities.

Below is a summary of the main collective sessions held during Year 2. The goal of these meetings was to raise awareness of parties on supply chain challenges and possible solutions.

- **Session on supply chain traceability solutions** (28 May 2024)  
Gaining more insight into the risks in renewable energy supply chain is among the priorities of the Agreement. To this end a session was organized to dive deeper and understand available commercial solutions that can support companies in their endeavours. During the session [Minespider](#), a leading commercial solution for supply chain traceability, presented their technology for digital product passports. Subsequently [Sinovoltaics](#) informed the parties about traceability audits they perform in China and how this can contribute to increasing insight into the solar energy supply chain.
- **Knowledge session on biodiversity** (9 July 2024)  
During this session Ørsted presented their 8 step biodiversity measurement framework that can be used both in wind and solar sector. After this another Agreement party, Novar, together with Groningen University, shared initial findings from their five-year research project on assessing the impacts of different solar park designs on different plants, birds, mammals, insects and soils in the province of Groningen.
- **Session on automobile sector** (1 October 2024)  
Automobile sector uses many of the same raw materials that are common in the renewable energy sector. Joining forces with automobile sector can help



renewable energy companies to increase their collective leverage in the supply chain. Therefore, a session was organised to explore common synergies and collaboration opportunities. During this session [Drive Sustainability](#), partnership of 16 automobile manufacturers, gave a presentation about the activities they have undertaken.

- **Knowledge session regarding child labour in extraction of critical raw materials** (12 November 2024)

Terre des Hommes Netherlands conducted a scoping study to better understand the probability of child labour in the context of critical mineral extraction.



It focused on the likelihood of child labour occurring, and not the actual occurrence of child labour due to the limited availability and access to data and information. During the session, they presented their recommendations and planned next steps to support children vulnerable to child labour in the critical mineral mining sector.

- **Knowledge session on environmental impacts of wind parks** (21 January 2025)

During this session, IUCN NL zoomed in on the impacts of onshore wind parks on biodiversity, while the North Sea Foundation presented evidence of those impacts and how biodiversity risks on marine life can be mitigated. This was followed with a presentation by Van Oord, where practical approach for enhancing ecological values in offshore wind farms was presented.

- **Knowledge session for government officials** (29 January 2025)

Member companies Vattenfall and PowerField gave a presentation about their responsible business conduct activities to policy officers at the Dutch Ministry of Foreign Affairs working in the Hague and at missions abroad. This interactive session aiming to exchange knowledge focused on the opportunities that the Agreement creates for companies and the challenges they experience in their sector.

- **Knowledge session on environmental impacts of solar parks** (4 March 2025)

The parties continued with the topic of biodiversity and, in this session, focused on the impact of solar parks on biodiversity. During the session, Wageningen University discussed the biodiversity risks associated with solar parks and gave practical tips how to enhance biodiversity in on shore solar parks. Companies GroenLeven and Oceans of Energy presented their approach to preserving biodiversity when building solar parks.

- **Forced Labour Training** (11 March 2025)

This training session organised by the Secretariat in collaboration with Anti-Slavery International focused on the topic of forced labour: where in renewable energy sector forced labour can occur, what the signs of forced labour are, what the international regulations require, what the companies are required to do,

how forced labour signs can be spotted and addressed, how this topic could be engaged with business partners etc.

■ **Due diligence roadshow training sessions** (March 2025)

Trade union CNV International, in collaboration with Holland Solar and Secretariat organised a two-day due diligence training on responsible business conduct on 13 and 20 March 2025. This training delivered in Dutch in Utrecht, focused on building basic knowledge on responsible business conduct and gave practical examples on how to start a due diligence process in the renewable energy sector. The training was attended by 24 participants from wind and solar energy sector (both Agreement and non-Agreement parties). Due to the success of the training, it is planned to organise a next round in autumn 2025, this time for more international partners in English.

**Other monitoring related activities**

During implementation Year 2 the Working Group on Due Diligence also met on 17 September 2024 to discuss the results of the baseline assessment and forthcoming recommendations and lessons. During this meeting a task force was created to look into the revision of the Due Diligence Assessment Framework in order to reflect the changes introduced by the Corporate Sustainability Due Diligence Directive. The task force, consisting of companies, civil society organisations and trade unions, met several times in 2024, but decided to pause the revision process as the legislation was not yet in force and further guidance was awaited from the European Commission.

The Working Group also emphasized the value of collaboration between civil society institutions and companies on due diligence. To this end the Working Group encouraged companies to share their Due Diligence Action Plans with the civil society organisations of the Agreement. In this context a pilot meeting was initiated in February 2025 with Agreement company Sunbeam and civil society organisations, trade unions and knowledge institutions of the Agreement. The meeting proved insights into the supply chain of Sunbeam and the challenges



associated with it. The Secretariat will continue to organise these meetings also in Year 3, this time in a slightly different format where also other peers from the industry will be invited.

***Tender and Public Procurement Processes***

The Working Group on Due Diligence includes a sub-Working Group on tender and public procurement processes. In implementation Year 2 the scope of the sub-working group was expended to also include aspects of private procurement and the process of supplier assessment. This decision was taken considering that these topics could be relevant to a broader group of companies beyond the current participants of the sub-Working Group. In line with this the Secretariat focused on organising collective workshops and intervision sessions. In particular, the intervision sessions were welcomed by the parties, as they provided an opportunity for them to share openly about their challenges.



Below is a short summary of these workshops:

- **Research on procurement of solar panels** (25 June 2024)

During this session The Central Government Real Estate Agency (Rijksvastgoed-bedrijf) presented their findings on procurement of sustainable solar panels. This research was published in late 2024 and can be accessed publicly [from their website](#).

- **Workshop on responsible contracting in renewable energy sector**

(5 November 2024)

During this workshop participants explored key principles of responsible contracting such as policies, codes of conduct and buying conditions. Parties looked into how responsible contracting—or its absence—can significantly influence a company’s human rights and environmental due diligence programs, the importance and role of contracts in the Corporate Sustainability Due Diligence Directive and the added value and implications of the [European Model Clauses \(EMC\)](#) as well as opportunities of the EMC for the Agreement and both larger and smaller participating companies.

- **Intervision session on sustainability legislation and responsible business conduct** (3 December 2024)

This session consisted of two parts: The first part of this session gave participants an overview of the key differences and similarities between the OECD Guidelines and the relevant legislation, such as Corporate Sustainability Due Diligence Directive, Corporate Sustainability Reporting Directive and Forced Labour Ban Regulation, but also helped attendees understand how implementing the OECD Guidelines can support their preparation for this sustainability legislation. During this part, the Dutch Ministry of Foreign Affairs shared information about the EU due diligence legislation. The second part of the session was more practical and interactive based on the case studies from Vattenfall and Powerfield.

## Collective actions and increasing leverage | impact on the ground

Supply chains of the renewable energy sector are complex and have many tiers. Many of the adverse impact in these supply chains require collaboration and collective action in order to be addressed. For this purpose the Agreement provides a platform for parties to undertake collective impact projects. Participation of two parties from all the Agreement parties is enough to initiate any impact project within the Agreement. This way the Agreement tries to stimulate parties to embark on collaborative actions.

The Working Group on Collective Actions and Increasing Leverage of the Agreement is the main structure within the Agreement which oversees collective projects. This working group is also responsible for undertaking actions to recruit new parties.

### Collective Projects

During the first implementation year parties focused on laying the groundwork for collective action. In Year 2 they began implementing three collective projects: the Peru copper project, the Worker welfare project and the Worker voice research project. In parallel, parties also initiated several research projects and explored additional collective actions to be undertaken in the years ahead. Below is a summary of these joint projects and additional actions:

#### Peru Copper project

The Peru Copper project officially started on May 1st, 2024. This project, funded by the [European Partnership for Responsible Minerals](#) (EPRM), involves member parties Sunrock, the Danish Institute for Human Rights, the SER – as the Secretariat of the RBC Agreement, the local NGO - Alliance for Responsible Mining, and The Copper Mark - a responsible sourcing standard for the copper industry.

The goal of the project is to integrate artisanal and small-scale copper mining (ASCM) into global responsible supply chains in Peru, through fostering positive interactions within the ASCM-sector, promoting respect for human rights, encouraging the adoption of better mining practices and supporting the integration of ASCM-production into responsible supply chains.

As a first step, parties identified necessary stakeholders for successful implementation of the project and began engaging stakeholders and initiating multi-stakeholder dialogues on the ASCM sector in Peru.

Next, parties analysed the [CRAFT Code](#) (an open and collaborative framework that drives progressive improvement in artisanal and small-scale mining practice) to assess to what extent it could be applied to the copper sector. Parties concluded that the existing CRAFT code could be applied to the copper sector, without any adjustments or changes.

Parties also identified artisanal and small-scale copper miners to participate in the project through territorial analysis, prioritized selection criteria and a site visit to verify eligibility. As a next step these miners will be assessed based on the CRAFT Code, and parties of the project will support them to become aligned with the CRAFT code.

### **Worker welfare project on renewable energy sites**

Several parties of the Agreement including Vattenfall, Sunrock, SSE Renewables, trade union FNV, Danish Institute for Human Rights joined forces to develop a collective project focused on worker welfare on renewable energy sites, where the focus is on posted and migrant workers.

The goal of this project funded by the Agreement, is to have a better understanding of the risks involved in the use of posted and migrant workers in renewable energy project sites in the Netherlands and Europe. Within this project, an online engagement session was held on 7 November 2024, hosted jointly by



the IRBC Agreement and German Energy Sector Dialogue. During this session companies and trade unions, civil society organisations, national authorities and international organisations engaged in dialogue on the salient risks for workers in renewable energy sites and potential ways to address them.

Project partners – Vattenfall and SSE Renewables – also developed a toolbox (see also page 16) to help companies identify, address and remedy adverse worker welfare conditions on renewable energy sites. A public consultation process on the toolbox was held throughout November-December 2024 to gather feedback and further improve the tools. Subsequently the toolbox was refined and presented to the Agreement parties on 6 February 2025. As a next step companies were invited to pilot the tools throughout 2025. An evaluation is planned early in 2026 to gather feedback from the piloting phase and subsequently finalise the toolbox for companies. Its tools are modular and can be adjusted to each company context. Although the tools are designed for renewable energy sites, many of them are also applicable to a wider group of companies, including those outside the renewable energy sector.





### Worker voice research project

In September 2024 the Secretariat commissioned the external Sweden based non-profit organisation [Globalworks](#) to conduct a worker-voice study into the suppliers of the solar sector companies in China. To this end several companies of the Agreement confidentially shared the names of the suppliers that they would like to include in the research. The research consisted of two phases:

Phase 1 of the project was completed in 2024. This was an explorative study, where Globalworks developed a preliminary research design, identified suitable experts, assessed data availability, and selected data analysis methods. Steering Committee decided to continue with the Phase 2 of the project, after being acquainted with the Phase 1 results.

Phase 2 of the project involves full-scale study, which started in March 2025 and is expected to be finalised early autumn 2025. This phase will deliver 2 research reports: first report will be a risk assessment on human and labour rights

violations based on workers' social media posts, second report will analyse the link of the suppliers with state-imposed forced labour based on publicly available data. Once Phase 2 is finalised, it will be presented to the Agreement parties.

The project is being funded by the Agreement.

### Nickel Indonesia supply chain mapping

Trade union CNV International and IUCN NL have commissioned supply chain mapping of companies linked to the nickel industry in Indonesia, more specifically Morowali Industrial Park, and its impacts on human rights and the environment. The research started in March 2025 and included desk research on related human rights risks. The supply chain mapping used customs data, previous mappings and information from companies, where relevant. In relation to environmental impacts Earthqualizer Foundation's spatial dataset and publicly available satellite imagery was used to illustrate three major upstream sustainability risks associated with mining in Morowali: deforestation, degradation of coastal ecosystems and communities' declining access to land/resources. Also attention was paid to the legal process of obtaining concessions and permits to mine for nickel.

The outcome of the study was presented in May 2025. Parties intend to develop a collective action based on their results.

The research is being funded by the subsidy from the Dutch government.

### Mica research

In June 2024, Terre des Hommes Netherlands presented a research idea to the Agreement parties. They proposed to further explore the use of mica in the wind and solar energy sector. Sources show that mica is used in cables, electronics and other key components of wind and solar technologies. The proposed research investigates whether and, if so, which parts of solar panels and wind turbines contain mica, which countries the mica originates from (India and/or

Madagascar) and in what quantities it is used. The concrete scope of the research was discussed with some companies in early 2025. The research is expected to be finalised and presented to Agreement parties during implementation Year 3.

The research is being funded by the subsidy from the Dutch government.

### **Child labour research**

In 2024, Terre des Hommes Netherlands conducted a research into the risks of child labour involved in the mining of critical minerals that are used by the wind and solar sector. The research findings and recommendations were presented to the Agreement parties. Subsequently, Terre des Hommes Netherlands, together with companies, prioritised following countries and specific minerals for further exploration in a small-scale research: aluminium – India and nickel – Philippines. This research aims to look into the occurrence and scale of child labour in the selected countries and specific minerals. The study is expected to be finalized and presented to the Agreement parties during implementation Year 3.

The research is being funded by the subsidy from the Dutch government.

### **Battery discussions**

Upon request of several companies of the Agreement, the Secretariat organized a series of small-group discussions on battery supply chains throughout 2024. Many of the signatory companies also operate in the battery domain and wished to use Agreement platform to expand their knowledge on this area. During these sessions, companies exchanged knowledge on the pertinent human rights risks in the battery supply chain, shared tips on improving due diligence with one another and supported their peers in their engagements with their business partners. The lessons learned from these discussions also served as the basis for developing the due diligence tool “Guidance on engagement with suppliers on forced labour” (see page 14).

### **Blockchain and AI project exploration**

Renewable energy companies have limited visibility into the upstream side of their supply chain. However, this knowledge is necessary in order to have a robust due diligence processes in place. Considering the wind sector is very complex and aims for more traceability, the Secretariat has engaged with wind turbine producers and cable companies to explore a potential traceability project during implementation Year 2. A number of discussions were organised in which companies identified materials and components where they wish to establish a supply chain traceability project. During Year 3, the Secretariat will engage with potential commercial solutions to identify the costs and conditions of such a project. Subject to the Steering Committee’s approval, this project could then be implemented in the Agreement.

### ***Increasing Leverage***

In addition to initiating and implementing collective projects, the Working Group on Collective Actions and Increasing Leverage is also tasked with recruiting new parties. By this, the parties of the Agreement aim to strengthen the sector’s collective leverage to address adverse impacts in the supply chain.

Throughout implementation Year 2 the Secretariat and various Agreement parties, including the government, companies and civil society organisations carried out outreach activities in order to raise awareness about the Agreement and its activities, as well as to recruit new parties. As a result, the signatories of the Agreement grew from 52 to 57 organisations, including 38 companies. See the full list of [participants](#) on the website. Among these, 12 represent solar companies, 22 wind companies, and 4 represent both.

One company also submitted its termination notice of the Agreement. This company’s termination will be effective as of early Year 3.



This increase of parties in implementation Year 2 was primarily due to an increase of the signatory companies. Agreement parties also aim to involve more civil society organisations. To this end, Secretariat and several parties have reached out to a number of civil society organisations. The parties aim to achieve tangible results on this front in Year 3.

Below is a summary of the outreach events organised or attended by the Agreement parties and the Secretariat:

- **Side-session within the OECD Forum on Responsible Mineral Supply Chain** (22 May 2024) Organised by CNV International, this side-session took place on the margins of the OECD Forum in Paris. The theme of the session was walking through the extended value chain together to tackle adverse human rights and environmental impacts. The session showcased the value of collaboration and provided practical examples of how this can be arranged in renewable energy and metal supply chains. SSE Renewables, Dutch Ministry of Foreign Affairs, the Secretariat and CNV International were among the speakers in the side-session.
- **Presentation to German Energy Sector Dialogue partners** (27 August 2024) Worker welfare is a shared focus of both the Agreement and the [German Energy Sector Dialogue](#), which is a multi-stakeholder collaboration platform operating in Germany. As such, both initiatives have worked together on this topic throughout 2024, in order to align priorities and avoid duplication of work. In this particular session Shell and Sunrock, as parties of the Agreement, shared their worker welfare activities and exchanged experiences with their peers in Germany.
- **Outreach event Brussels** (23 September 2024) The Secretariat, Vattenfall and Dutch Ministry of Foreign Affairs participated in the event “Together towards effective implementation of CSDDD: Multi-stakeholder approaches in corporate due diligence”, organized jointly by the German Federal Ministry of Labour and Social Affairs and the German Federal Ministry for Economic Cooperation and Development. During the event the Director of the Trade Policy and Economic Governance department of the Dutch

Ministry of Foreign Affairs joined the panel and shared Dutch experiences with multi-stakeholder approaches and their potential for corporate due diligence. The event was accompanied by a marketplace where the Agreement was showcased along with other multi-stakeholder initiatives from Europe.

- **UN Forum on Business and Human Rights Forum** (25 – 27 November 2024) The Forum provides a valuable opportunity to connect with experts and stakeholders. To this end several Agreement parties, as well as the Secretariat, attended the Forum. In the margins of the Forum, the Secretariat and the Dutch Ministry of Foreign Affairs held meetings with various stakeholders, including several multi-stakeholder initiatives, companies and rightsholders from renewable energy supply chains.
- **Engagement with diplomatic missions** During the second Agreement year, Dutch Ministry of Foreign Affairs established contacts with the Dutch embassies in Sweden, Germany, China and Peru and raised awareness about the Agreement and the collective actions it produces. Also, Dutch Ministry of Foreign Affairs established contacts with governmental counterparts in the EU, Sweden, Germany, Flemish government and Denmark. The Dutch embassy in Peru supports the Agreement parties on the implementation of Peru copper project by providing logistical and informational support. The interactions with the embassies in Sweden, Germany and Denmark focused on exploring potential collaborations in these countries to support signatory companies in implementing the Agreement
- **Outreach meetings with multi-stakeholder initiatives** During implementation Year 2 the Dutch Ministry of Foreign Affairs organised regular outreach meetings with the multi-stakeholder initiatives in Germany, Denmark and Sweden. Many of the signatory companies in the Agreement have their headquarters in these countries. Several initiatives in these countries also tackle different aspects of responsible business conduct. Therefore, it is essential to learn from each-other and explore possible synergies. In these outreach meetings participants included representatives from the German government, ETI Sweden and Denmark and the German Energy Sector dialogue.

#### ■ Presentations in different platforms

Throughout implementation Year 2 the Secretariat and parties jointly delivered presentations across various collaboration platforms. On 26 September 2024 the Secretariat, Vattenfall and SSE Renewables introduced the Agreement and how working collaboratively on RBC benefits individual companies with a joint presentation for [Omnes Capital](#), a leading European private equity firm dedicated to the energy transition, and its 12 partner companies from the wind and solar energy sector. Similar presentations were delivered for 15 energy companies and members of Green Power Denmark on 29 August 2024 during Human Rights Workshop organized by the Danish Institute for Human Rights, to ETI Sweden Solar Energy Working Group members on 26 November 2024, as well as to different companies and stakeholders at the quarterly meeting (Q-day) of Dutch wind sector on 12 February 2025.

#### ■ Participation at ASN Webinar (10 December 2024)

ASN Bank, as a supporting organisation of the Agreement, organised a [webinar](#) on the topic of “How can the energy transition be fair?” together with Change Inc. This webinar looked into the challenges faced by the renewable energy sector and discussed what was needed for the energy transition to be fair. Chairperson to the Agreement, Kees Vendrik, was also among the speakers of the webinar, where he emphasised the importance of collaborative action in tackling shared due diligence challenges in the context of a fair energy transition.

#### ■ Outreach with hydrogen sector

During the implementation Year 2, parties have explored potential expansion of the Agreement to hydrogen sector. In this context the Dutch Ministry of Foreign Affairs took part on 16 April 2025 in Sustainable Hydrogen Import Programme Netherlands (Ship NI) session with the hydrogen companies and presented the Agreement. There is a potential synergies for collaboration between wind and solar energy sector and hydrogen sector. The latter will explore further whether they would like to cooperate on responsible business conduct within or outside the Agreement.


## Access to remedy | from negative impact to recovery

Occupational hazards, worker exploitation, child labour, and the destruction of critical natural ecosystems may occur in the supply chains of companies. Such harm to people and the environment may be a result of the actions or omissions of one or more actors in the supply chain. Access to remedy is therefore an integral part of companies’ due diligence processes. It involves ensuring that victims of adverse impacts can seek redress from companies that caused or contributed to the harm.

[Renewable Energy Complaints and Disputes Committee](#) (RECDC) is an operational and independent mechanism to resolve disputes (between parties and the Secretariat) and to address complaints (between companies and external stakeholders). The RECDC currently comprises of three permanent members (Martin Scheltema, Manon Wolfkamp, Liesbeth Enneking) and two alternate members (Paul van der Heijden, Victoria Marquez Mees). The RECDC became operational on 1 May 2024.

No disputes or complaints were submitted to the RECDC during Implementation Year 2. However, access to remedy was identified as one of the key challenges within the sector. As such, during implementation Year 3, the Secretariat and parties will embark on various activities to raise awareness among the signatory companies about the importance of this due diligence step. An intervention session is planned for autumn of 2025, where parties can share good practices and learn from each other.





# Looking forward to year 3

## Looking forward to year 3 | Preview and priorities

Looking ahead to Year 3, the following activities are planned:

### Assessment process

The second monitoring round of the Agreement companies will be completed in the summer of 2025 and the outcomes of the monitoring will be aggregated and anonymised in a progress monitoring report. These progress report results will demonstrate how much progress companies have made within the last year and determine the focus areas of the Agreement for individual and collective support for the coming year.

### Knowledge and awareness raising, peer learning and trainings

NGO's, trade unions, and knowledge institutions of the Agreement in collaboration with the Secretariat and various Agreement companies will organise thematic knowledge and peer learning sessions. Some of the planned topics are: reporting on environmental topics, reporting on IRMA standard, end of life of renewable energy technologies, mitigation measures for environmental impacts of renewable energy infrastructure, methodologies to assess human rights impacts, recommendations for incorporating a human rights-based approach into audits of minerals and energy projects, and an intervision session on access to remedy, among others. The next cycle of the Due Diligence Training on Responsible Business Conduct will take place in autumn 2025. Also, the Dutch government will keep member parties informed about their policy and developments on the EU due diligence regulations.

### Tools

The Secretariat will support companies in implementing and understanding existing tools within their organisations bilaterally and through a range of collective meetings. For some of the existing tools a piloting phase will be

conducted to gather feedback to refine the tools. The Secretariat will also develop various tools and guidance materials on due diligence, in collaboration with other parties and upon request of parties.

### Collective projects

The Peru copper project, and the Worker voice research project will all be finalised in Year 3. Several research projects—such as those on nickel, mica, and child labour—are expected to be completed. The parties will determine their next steps based on the outcomes of these studies. The Worker welfare project will complete its pilot phase in early 2026 after which the tools will further be refined and finalised. Also, the exploration of blockchain and AI project will continue.

### Impact evaluation

As the Agreement is approaching its mid-term, parties have expressed a desire to have an impact evaluation in order to understand if the Agreement goals are being met and where parties are having the most impact on the ground. Secretariat have prepared some guidelines for such an impact analysis. The mid-term evaluation is expected to be conducted by an independent third party.

### Outreach

The parties to the Agreement will continue participating in various outreach activities to raise awareness about the Agreement and the various collective actions it supports.

With this shared sense of purpose, the parties to the Agreement for the Renewable Energy Sector continue on, committed to powering change together towards a fair energy transition.



# Interviews and Statements

**Solarwatt B.V.** Michiel van Schalkwijk

**IUCN NL** Antoinette Sprenger

**Holland Solar** Maaïke Beenes

**NedZero** Richard Brakenhoff

**Dutch government**

**CNV International** Elles van Ark

**Eolus** Anna Sundström



**Michiel van Schalkwijk**

Director of Solarwatt B.V. Netherlands

### *‘Powering a better tomorrow – that’s our mission’*

**Solarwatt B.V., a subsidiary of Solarwatt GmbH, has participated in the International RBC Agreement for the Renewable Energy Sector since December 2023. The company develops energy systems for homes and businesses, including solar panels, batteries, EV chargers, and energy management solutions. Director Michiel van Schalkwijk, who has worked in the solar industry for over thirty years, clearly defines his mission: “We don’t just want to deliver renewable energy; we want to ensure it is produced sustainably.”**

#### **PFAS-free and low carbon emissions**

Solarwatt’s solar panels combine durability with minimal environmental impact. “Our panels use glass-glass technology, making them PFAS-free and highly recyclable. We minimise emission by producing on green electricity as much as possible” says Van Schalkwijk. “Even when producing elsewhere, we consciously choose locations committed to sustainable practices and low emissions. Customers are increasingly aware of these aspects, and they actively seek responsible choices.”

#### **Collaboration is key**

Despite complexities within the supply chain, Solarwatt actively engages in collaboration with Chinese suppliers to drive positive change. “Last year, we personally visited production sites in China. It was inspiring to see how having open conversations helped plant seeds for sustainability. You could feel a shift towards sustainability

beginning to happen.” While acknowledging that there is much room for improvement, he considers these discussions a significant step forward. “We’re not here to point fingers but to take our responsibility. Each week, we discuss with our suppliers how to enhance transparency in their supply chains. We know their suppliers up to the polysilicon production. We actively focus on origins and the lowest possible carbon footprint. Such cooperation leads to tangible improvements.”

#### **Recycling as a logical next step**

Besides production, Solarwatt actively looks towards recycling. The company co-founded the Foundation for Solar Energy Recycling Netherlands (ZRN) and fulfills a position in the board of the OPEN Foundation, responsible for collecting and recycling electronic waste. “OPEN recently signed a contract with a Dutch recycler,” Van Schalkwijk explains. “They dismantle solar panels, separate ►

materials, and even recover silicon. This innovative recycling process is now nearly cost-neutral, representing a true breakthrough and a significant step forward for the circularity of solar panels.”

### Cradle-to-Cradle certified

Solarwatt is one of few companies in the sector worldwide to hold Cradle-to-Cradle certification. It offers customers and partners transparency and the unique guarantee that the entire production process of their glass-glass solar panels is fully sustainable and responsible: “It’s not only about material usage, but also about energy consumption, water management, and social responsibility,” Van Schalkwijk adds. “It underlines our long-standing commitment to making our products sustainable and reflects our quality and intrinsic motivation as a company to contribute to a circular and responsible energy future at every step. Cradle-to-Cradle certification matters because it encourages companies to systematically think about the impact of their products—from sourcing raw materials to recycling. It guarantees Solarwatt’s clean energy is produced sustainably.”

### Why join the Agreement?

Participation in the International RBC Agreement for the Renewable Energy Sector was a deliberate choice for Solarwatt. “We not only want to demonstrate that we take responsibility but also that we continuously want to learn. The Agreement’s practical tools and inspiring network of like-minded organisations are extremely valuable for a

medium-sized company like ours,” says Van Schalkwijk. “Knowledge sessions on topics such as due diligence help us remain vigilant and actively supports us in making meaningful progress.”

### Moving forward together

Van Schalkwijk sees many opportunities for acceleration: “We are at the beginning of what’s possible. New technologies, growing customer awareness, and many companies’ willingness to look beyond price alone create momentum. The Agreement helps amplify this momentum.” Policymakers also play a significant role. “There are opportunities to incentivize sustainable

production, for instance, through tender criteria or subsidies targeting low-carbon emissions. Initial steps, like integrating sustainability in the Dutch SDE++ subsidy scheme, offer promising prospects.”

### A responsible and resilient sector

Despite the dilemmas the sector is facing, Van Schalkwijk remains optimistic: “Anyone working with solar panels knows significant issues exist in the supply chain, but by addressing these consciously, you can contribute to positive change. Perfection might be unattainable—but our collective ambition is genuinely inspiring. Together, we are building a responsible and resilient sector.”







## Antoinette Sprenger

Senior Expert Environmental Justice  
at IUCN NL

**The energy transition is urgent. But how can we ensure it doesn't come at the expense of nature and human rights? According to Antoinette Sprenger, senior expert environmental justice at IUCN NL, the answer lies in collaboration, knowledge, and courage. "We don't want to repeat the mistakes made with fossil fuels."**

## *'Let's avoid repeating the mistakes made with fossil fuels'*

### Responsible mining: putting people and nature first

Sprenger is committed to actively sharing IUCN NL's knowledge on nature and human rights with companies in the supply chain. "Many of the minerals required for solar and wind energy are extracted from areas with rich biodiversity and vulnerable communities. The energy transition is urgent, but we must shape it in a responsible way."

IUCN NL's reason for joining the Agreement is clear. "We want to help companies make better choices—to extract resources as sustainably as possible, with minimal harm to people and nature." Sprenger notes that environmental concerns often take a back seat to human rights topics: "Nature tends to rank second after people, while

biodiversity is a prerequisite for life itself." She refers to the consequences of fossil fuel extraction as a warning: "Leaking pipelines, polluted water, destroyed ecosystems—when economic gain takes precedence. We must not let that happen again."

### Knowledge sessions as a catalyst for change

A key role of IUCN NL in the Agreement is organising knowledge sessions. Together with other partners, IUCN NL has hosted sessions on the impact of offshore wind farms and ways to boost biodiversity in solar parks. "Many solar parks are built on depleted agricultural land. With good management, biodiversity can be restored. But it must be done properly: removing cuttings, planting diverse vegetation, allowing enough light. Not covering every inch with panels." During the session on offshore wind, ►

Van Oord shared how they use techniques such as bubble curtains and artificial reef structures to reduce the impact on marine life. “That gives me hope,” Sprenger says. “It shows that there are indeed solutions.”

### IUCN NL as a connector

With its global network, IUCN NL is ideally positioned to connect companies to local experts. “We’re a network organisation. For example, in Sulawesi, where nickel is mined, we work with local partners. They can help companies better understand and improve the local situation. Also, we are project-driven”, Sprenger continues, “For in-depth advice, companies would need to hire us. But within the Agreement, we can already do a lot: share knowledge, work on collective projects with companies, provide case studies and facilitate connections.” She adds, “We also learn a great deal from companies—how they handle complex supply chain issues helps us refine our support.”

### From awareness to action

Sprenger sees the Agreement as a powerful tool to raise awareness and foster collaboration. “As an NGO, you get in touch with companies you might not otherwise meet. And you can plant a seed.” For example, solar company Sunrock reached out following a knowledge session to discuss their double materiality assessment—an analysis

of how sustainability affects their business and vice versa, as required under European laws such as the [Corporate Sustainability Reporting Directive \(CSRD\)](#). “It turned into a very productive conversation,” says Sprenger.

### Ways to exert influence

Still, challenges remain. “Not every company knows what to do with biodiversity. It often sits far down their supply chain, or they feel powerless. Smaller companies often lack the resources to fully investigate the issues, but” she adds, “you can still exert influence—through your procurement terms, for example.” IUCN NL advises companies to refer to standards like the Initiative for Responsible Mining Assurance (IRMA). “We consider IRMA the best current standard because it robustly incorporates both biodiversity and the rights of local communities and indigenous peoples. Even if you don’t have a direct link to a mine, you can steer through your purchasing power.”

### Reach out, ask for help

What does Sprenger hope to see from companies in the coming year? “Use the knowledge and networks available. Those knowledge sessions are also an invitation,” she says. “Reach out to us, ask for help or advice, let us know what you’re facing. Let’s make collaboration between NGOs and companies more concrete. Not just sharing knowledge but taking action together.” She concludes: “We all benefit from a successful—and just—energy transition.”



**Maaïke Beenes is senior sector specialist at Holland Solar, the Dutch trade association for all companies active in the solar energy sector. She observes how, despite difficult market conditions, a lot of companies in the sector continue to advance in the field of responsible business conduct. “The motivation is strong. And there is a growing realisation that collaboration is essential to really make progress.”**

**Maaïke Beenes**

Senior Sector Specialist, Holland Solar



### *‘From good intentions to tangible steps’*

Over the past year, solar energy companies have faced unpredictable and fluctuating policy both at the national and European levels. For example, European RBC legislation that was already being implemented by companies is now being changed in significant ways. Other issues like low energy prices and grid congestion also impact the business case for solar. These conditions have had an impact on capacity for topics like RBC. Yet Beenes is struck by how committed most companies remain to the goals of the International RBC Agreement for the Renewable Energy Sector. “During the due diligence training in March 2025, the trainer remarked: ‘It’s great to see how engaged the

participants are’, compared to workshops she had given to companies from other sectors. This shows that despite the challenges, this topic is clearly alive.”

#### **Due diligence baseline assessment provides direction**

An important first milestone in the Agreement was the baseline assessment of due diligence policies among participating companies. Solar energy companies achieved an average score of just 33%, which was lower than their wind sector counterparts. “That score seems low,” Beenes acknowledges. “In part, it reflects the fact that most solar

companies in the Agreement are relatively small, and did not have a lot of formal policies in place when joining the Agreement. Even though in some cases companies were already addressing issues, just not in formal policy documents. There is a lot of low hanging fruit, like formalising existing practice, that will lead to a higher score. The baseline served as a starting point. Companies now better understand where they stand and can take more targeted action. Significant progress is required in the later stages of the due diligence process, such as measuring and communicating impact. Encouragingly, nearly all companies are motivated to take those next steps.” ►



## From ambition to action

In summer 2024, Holland Solar published a position paper on Circularity and RBC Growth Path. “In this paper, we propose non-price criteria that should be required of all companies in the sector on topics related to circularity and RBC. We also suggest how these criteria can be strengthened over time. Applying these criteria is important because it helps create a level playing field and prevent a race to the bottom on price that prevents companies from taking steps on sustainability,” Beenes explains. “Not everything has to be perfect tomorrow, but there must be a clear direction.”

A key proposal in the position paper is the incorporation of qualitative criteria into subsidies and public procurement. “Based on our input, the Dutch Ministry of Climate Policy and Green Growth is now investigating the introduction of a maximum CO<sub>2</sub> footprint requirement for solar panels in the SDE++ subsidy scheme. That would be a significant advancement.”

## European legislation: opportunity and challenge

Another major development is the EU legislation banning products made using forced labour, which will be implemented in 2027. “The sector is eagerly anticipating this law,” says Beenes. “It is an important part of improving human rights in supply chains and will contribute to a level playing field. However, many questions remain. A lot is still unclear about exactly how the ban will be implemented. Especially smaller companies need clear guidance. The same applies to European CSR legislation like the CSRD



and CSDDD. Here the Agreement plays a role in helping companies prepare, through knowledge-sharing and practical sessions.”

## Moving forward together

The workstreams and collective projects within the Agreement are important to facilitate knowledge sharing and collective action members. “Collaboration is key,” she stresses. “These spaces also help bridge the gap between the expertise NGOs have and what companies are working on. It makes dialogue even more important. What I hope for in the coming year,” she continues, “is that companies will increasingly find each other. If you share the same supplier, you might be able to take joint action. It may be difficult or even impossible to achieve change alone, — but together, you can have an impact.”

## It is all about moving forward

Beenes notes that the RBC discussion is broadening.

“Where it used to be mainly about forced labour, which is of course one of the most urgent issues to address, now there’s also attention to topics like worker welfare and biodiversity in solar parks, indicating growing maturity.”

And that’s necessary because the challenges persist:

“The solar energy sector depends on imports, with all the associated risks. Companies want to take action, and the Agreement really helps with that. In the end, it’s all about moving forward — even if it’s one small step at a time.”

Beenes concludes: “Sometimes it is difficult to find the perfect solution, especially in cases where companies have little leverage over issues deep in their supply chain. But even in those cases it is important to keep taking steps in the right direction. And as a sector, we must keep moving.”



### Richard Brakenhoff

Industry specialist Safety, Health and CSR at NedZero

**As the industry association for the wind sector, NedZero was one of the initiators of the International RBC Agreement for the Renewable Energy Sector. The fact that the wind sector is ahead of the curve and strongly focused on developing Responsible Business Conduct (RBC) is evident from the positive results of the 2024 baseline due diligence assessment initiated by the Agreement. Yet, in a rapidly changing world, the sector faces real dilemmas. Richard Brakenhoff, Industry specialist Safety, Health and CSR at NedZero, reflects on almost two years of involvement in the International RBC Agreement for the Renewable Energy Sector.**

***‘The urgency is enormous. RBC requires clear choices and cooperation at every level’***

#### Growth with impact

The world is changing fast, and that affects how the renewable energy sector engages with RBC. “When I started, there were maybe ten bids per offshore wind tender. That’s no longer the case,” says Brakenhoff. Still, he is proud of the growing number of companies joining the Agreement and actively reaches out to potential new participants: “We now have 24 companies from the wind sector involved, including well-known names such as Mitsubishi, TenneT, Cadeler and NKT. That’s a substantial increase.”

Participation in the Agreement has recently become a requirement for public tenders. “In the Dutch tenders for offshore wind farms ‘IJmuiden Ver Alpha and Beta’, the price wasn’t the only factor — sustainability and RBC were also heavily weighted. That’s unique in Europe, and it works. Companies realise that joining the Agreement boosts their reputation and creates commercial advantages. It shows they’re not afraid to tackle complex

issues. And when you work with companies that have signed the Agreement, you can rely on the fact that their due diligence is already in place.”

#### Balancing ambitions and reality

At the same time, the sector faces fundamental challenges. “The energy transition requires vast amounts of raw materials. For several critical components, we’re highly dependent on a limited number of suppliers and regions. Becoming less dependent means investing in alternative sources closer to home — if they exist. And that also takes time.”

Brakenhoff sees how the sector balances RBC ambitions with present-day realities: “We want to source responsibly, but we also can’t afford to slow down the energy transition. We want to avoid wrongdoing in the supply chain, but without certain materials, we risk compromising the entire energy supply. It’s a tricky balancing act.” ►

### Taking steps together

Despite the complexity, there also are positive developments. A traceability project has been launched to gain better insight into the origin of raw materials, and NedZero follows Agreement projects focused on copper in Peru and nickel in Indonesia. “It’s complex,” says Brakenhoff, “but it’s a start.”

Progress is also being made in circularity. Much of a wind turbine’s materials can already be recycled. “The biggest issue used to be the turbine blades — they ended up in landfill. Now there are processes to recycle them. That’s a huge step forward.”

Cooperation within the Agreement is essential. “We discuss difficult issues too, such as the admission of new companies with different working methods or backgrounds. Opinions may differ, but the fact that these discussions take place is a big step forward in itself.”

Brakenhoff sees the Agreement as a unifying force: “When companies all apply the same RBC standards, collaboration becomes easier and more reliable. It prevents duplication, provides clarity, and strengthens trust throughout the supply chain.”



### Opportunities at the European level

The international nature of the Agreement offers opportunities. Looking ahead, Brakenhoff hopes the Dutch approach will gain traction across Europe. “It would be a great step forward if we could enhance collaboration at the European level. One RBC framework, one set of due diligence questionnaires — it would eventually save an enormous amount of time and effort.”

And that time is precious. “The urgency is enormous. We need to reduce our reliance on fossil fuels, protect the North Sea’s natural environment, and ensure the energy

transition remains affordable. That requires clear choices and cooperation at every level.”

### Looking back with pride

Richard Brakenhoff looks back on the past two years with pride. “What I’m most proud of is the progress we’ve made together. Projects have been launched, companies have joined, and a movement has begun — one that I hope will continue to grow across Europe. If we want the energy transition to succeed and be responsible, we have to keep working together.”



### *‘Continued growth of awareness and focus on RBC’*

#### Role of the Dutch government

The Dutch Ministries of Foreign Affairs (MFA) and Climate Policy and Green Growth (MCPGG) represent the Dutch government as members of the Agreement and support it financially as well as substantively. Both ministries attach great importance to a fair, socially just and sustainable responsible energy transition and appreciate the focus of this multi-stakeholder initiative on collaboration, knowledge sharing and joint learning, also through joint projects in the supply chain. In that way, the Agreement fosters interaction between the several Agreement parties to collectively develop solutions. Both ministries actively participate in the General Assembly, the Steering Committee, various working groups, and in promoting the Agreement at home and abroad.



#### Domestic activities

In the Netherlands, the Dutch MFA has been a participant and guest speaker in several events concentrating on the Agreement. For example, MFA, in collaboration with member companies of the Agreement, has organized a government session for policy officers of MFA and MCPGG working on relevant policy topics related to this Agreement, as part of their role in supporting companies to improve their due diligence. To further fulfill their role, MFA has actively participated in sessions about EU due

diligence legislation and regularly updated the members on relevant policy developments.

Last year MCPGG included RBC award criteria in the tenders for offshore wind energy sites IJmuiden Ver Alpha and Beta. Both permit holders have committed to these RBC criteria. This year MCPGG has included very similar RBC award criteria in the tender for offshore wind farm site IJmuiden Ver Nederwiek I. This tender has not yet opened, so the results remain to be seen later this year. ►

For onshore solar, the Parliamentary Letter on Solar Energy Development, published last 6 January 2025, also reflected on the importance and developments regarding RBC in the solar sector. Setting RBC requirements for solar-PV is also being explored on an ongoing basis.

From 2026 onward RBC prequalification criteria will have to be included in (a part of the) renewable energy auctions as a result of the European Net Zero Industry Act.

### International activities

The Dutch government is also promoting international responsible business conduct beyond Dutch borders. As part of their role to reach out to other countries, MFA has participated in various events abroad. For example, they have once again participated in the OECD Forum on Responsible Mineral Supply Chains in May 2024 and served as a panelist at the partner session organized by CNV International about multi-stakeholder initiatives. Moreover, MFA took part in the 2024 UN Business and Human Rights Forum where they established new relevant contacts related to the Agreement. Furthermore, MFA continued outreach to other governments during the Multi Stakeholder Initiative event in Brussels, leading to an ongoing conversation with the governments of Germany, Denmark and Sweden.

### Looking back and forward

Looking back on the results of the second year, main RBC risks have been identified through the due diligence assessment. This has helped companies to understand what they were doing well and where further improvement is needed. The members are collaborating in collective actions, such as projects on artisanal mining, migrant workers and forced labor and transparency. At the same time, it shows that awareness and focus on RBC in the renewable energy sector are growing, with more companies implementing due diligence. These

developments are also being encouraged at the European level, leading to the push for European legislation such as the Forced Labor Regulation and the Corporate Sustainability Due Diligence Directive.

Looking ahead, European legislation will help prevent issues in the renewable energy supply chain, and the government will continue to encourage companies to prepare for this by actively participating in the RBC Agreement.





**Elles van Ark**

Director CNV  
International

**CNV International passionately believes the energy transition is linked to raw material extraction conditions. The trade union collaborates with companies, governments, and civil society through the RBC Agreement to improve labour conditions in production countries. “Change begins with honest dialogue,” states director Elles van Ark.**

### *‘Change begins with honest dialogue’*

#### **The dark side of nickel**

Together with IUCN Netherlands and Profundo, CNV International researches the nickel supply chain. “Nearly sixty per cent of global nickel production, used in batteries, solar panels and wind turbines, comes from Indonesia,” Van Ark explains. “The research shows there is a high likelihood that European companies—either directly or indirectly—source nickel from this region.” During field visits, CNV International identified serious abuses, such as pollution and unsafe working conditions. “A recent survey by our Indonesian partner trade union revealed how poor workplace safety really is. Even they were shocked, and that says a lot.” The nickel supply chain research helps companies better understand their role. “The clearer the link, the more targeted the contribution to improvement,” she adds.

#### **Training that works**

CNV International also offers practical support within the Agreement. In March 2025, they hosted a two-day due

diligence training session. In autumn an English version for international companies will follow. “We guide participants through the six steps of the OECD Guidelines,” says Van Ark. “We make it practical. After the training, companies often say: ‘Now I see what I can do today’. You do not need to wait for legislation. There are many steps you can take right now.”

#### **International visibility**

In May 2024, CNV International took part in the OECD Forum on Responsible Mineral Supply Chains in Paris. Van Ark led a side session on meaningful stakeholder engagement: “The goal was to show what a multi-stakeholder approach can achieve. We sat alongside companies and governments. Using a case study based on our experiences from a collective project on occupational health and safety in mining in Peru and Bolivia—together with companies Tata Steel, Nyrstar, Trafigura and Minsur—we showed how collaboration with trade unions can lead to real improvements in the supply chain. If you move ►



forward together, you can really make a difference—even under the toughest conditions.”

### Fair Work Monitor: giving workers a voice

One of CNV International’s most powerful tools is the Fair Work Monitor. It gathers work floor data via local unions. “We gather information on topics such as health, safety, income and contract types,” says Van Ark. “It provides a baseline: what is really going on?” What is unique about the tool is that workers themselves are consulted—even in remote mining areas: “What they tell us forms the basis for an action plan. You don’t have to change everything at once, but it gives insight into the priorities.” The Monitor also fosters cooperation: “Many companies are willing but do not know where to start. This helps point the way.”

### A call to action

Van Ark notes that CSR and procurement departments do not always coordinate effectively, yet that collaboration is crucial to truly making supply chains more sustainable. The Agreement offers space for this type of learning: “We learn what companies are up against, and they learn what we as a trade union can contribute. That mutual understanding is what drives change.” She hopes the coming year will mark a shift from exploration to implementation: “We have used the past period to explore. Now it is time to act.

Use available tools, like the Fair Work Monitor. Test them. Share your experiences. Join existing projects—or launch your own. Only then can we make a difference together.”

### Building trust

Van Ark emphasizes the importance of social dialogue:

“In some countries, it is unusual for trade unions and companies to engage with one another. Sometimes we even encounter distrust.” During a joint visit in Peru, van Ark was asked: ‘Are you on the side of the company, or

ours?’ She explains: “That was an eye-opener. We are here for the workers, but we also seek collaboration with companies. Once you initiate a dialogue, you can build trust. And only together we can create a fair and sustainable supply chain.”

“We don’t just want to highlight problems,” Van Ark concludes. “We want to show this is what you can do—starting today. Not everything is achievable but doing nothing is not an option.”



## *‘From good intentions to tangible steps’*

**For Eolus, joining the RBC Agreement for the Renewable Energy Sector represents more than a strategic decision—it’s a commitment to proactively engage in collective solutions for environmental issues, human rights and labour conditions. Anna Sundström, Sustainability Specialist at Eolus, passionately shares her vision and ambitions for making genuine sustainability a core component of business.**

### **Bringing new perspectives to renewable energy**

“We joined the Agreement primarily to strengthen our internal processes and amplify our positive impact throughout the renewable energy value chain. As a relatively small company, we knew that to effectively address complex sustainability challenges, collaboration with other stakeholders is crucial,” Sundström explains.

With a diverse background in human rights, NGOs, and the agri-food sector, Sundström brings a fresh perspective to renewable energy. “I was hoping to use experiences from the food sector - fresh produce & ready-to-go solutions - in the renewable energy sector. In the food sector, I saw

customer demand increase significantly - for example, with traceability requirements for ingredients in ambient products that went well beyond what the law required. Material traceability is important to the renewable energy sector as well. It’s about understanding ESG risks and impacts and to have a possibility to address them,” she explains.

### **Embedding sustainability in core operations**

Eolus has made sustainability integral to its operations by embedding a new sustainability strategy directly into the company’s overarching business strategy. “Our sustainability strategy, launched in March 2024, directly informs our business strategy for 2025-2027,” Sundström highlights. “This year, we are prioritising identifying salient human rights and labour conditions within our supply chain. For the first time, every function within Eolus has specific sustainability KPIs. This integration ensures we don’t just talk about sustainability—we act.”

Sundström further emphasises the importance of setting clear and measurable targets. “By integrating KPIs into our core business strategy, we create accountability throughout



**Anna Sundström**

Sustainability Specialist  
at Eolus

the organisation,” she adds. “This clarity helps employees across departments understand their role in achieving our sustainability goals.”

### **Driving internal commitment**

Creating internal commitment is another crucial element of Sundström’s role. Together with Sigrid Carstairs (Sundström’s closest colleague and sustainability specialist regarding environmental issues) she actively works with management and teams across the organisation, forming working groups focused on indigenous rights, biodiversity, and internal training. “Our approach is proactive,” she says with enthusiasm. “Our sustainability strategy clearly outlines actions, and I ensure these are implemented step-by-step. Our management fully supports this approach, recognising sustainability as an essential business function.” ►

To further strengthen internal commitment, Sundström regularly engages with colleagues through training sessions, workshops, and ongoing dialogue. “Education and awareness are key. When people truly understand the impacts and benefits of sustainable practices, they naturally become ambassadors for these initiatives,” she explains.

### Navigating challenges with collective action

Despite Eolus’s clear ambitions, challenges remain, particularly concerning supply chain transparency and traceability. “Upstream supply chain visibility is difficult. The sector is heavily dependent on raw materials, the extraction and refinement of which is connected to human rights challenges, child labour - and forced labour challenges,” Sundström explains. “It’s daunting at times, but we remain committed to finding impactful solutions.”

Sundström stresses that these complexities underline the critical importance of the Agreement. “The collective leverage gained from collaborating with industry peers, trade unions, NGOs, and governmental bodies is invaluable,” she says. “Participating in the Agreement allows us access to developed standards, templates, and tools created with diverse perspectives. It ensures our approach is robust and credible.”



### Expectations and active participation

Looking ahead, Sundström’s expectations for the Agreement are clear: collective action, practical tools to be used internally, and tangible impacts. “Through cooperation, we can identify and implement meaningful actions more efficiently,” she says. Eolus is already actively involved, providing input to working groups focused on topics such as battery sustainability and code-of-conduct templates.

Ultimately, Sundström believes transparency and collaboration within the sector will benefit everyone involved. “By openly addressing our shared challenges, we strengthen our collective ability to achieve meaningful

progress,” she says. “Transparency is critical—not something to fear. When we collaborate openly, the whole industry advances.”

Reflecting on her role, Sundström sees continuous improvement as the cornerstone of meaningful sustainability. “It is essential to remain adaptable, responsive to new insights, and willing to adjust our strategies as needed,” she explains. “Sustainability is a journey, not a destination, and every step forward matters.” Sundström concludes with optimism, reflecting the spirit of the Agreement: “We must continuously improve and truly walk the talk. Only by doing this together can we contribute to a sustainable future.”



## Colophon

This second progress report of the International RBC Agreement for the Renewable Energy Sector covers the period from May 2024 to May 2025. This annual report was published in July 2025.

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