



Charged Together For Change

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 insight to impact’

Three years after the launch of the [International RBC Agreement for the Renewable Energy Sector](#), it is clear that the initiative has gained traction. The number of participating organisations continues to grow, and the assessments show that companies are steadily improving the way they organise their responsible business conduct processes. In both wind and solar sectors, we see companies gaining a better understanding of where the risks in their value chains lie and how they can take responsibility for addressing them.

That is encouraging, because without this insight we cannot move forward. But the question that ultimately concerns everyone is a simple one: does it lead to real societal impact? Over the past few years, much of our work has focused on knowledge sharing, building relationships and strengthening due diligence processes within companies. That foundation is essential. Now it is time to translate that shared knowledge and collaboration into tangible improvements for people, the environment, and communities across the value chains of the energy transition.

The greatest opportunities lie in the fact that companies engage with their suppliers in more structured and professional ways. This can involve thousands of companies across a single supply chain. Such strategic conversations are essential for driving progress and they act like a diesel engine: slow to start, but ultimately capable of generating significant impact.

Simultaneously, the limits of what companies can achieve on their own are becoming increasingly clear. In many supply chains, dependence on specific

countries or raw materials remains significant and sometimes companies have limited leverage to drive change themselves. It raises a broader question still growing in urgency: how do we ensure greater strategic and geopolitical resilience in our supply chains?

This is precisely where the Agreement plays a key role. Additionally, it serves as a safe space where companies and government can engage in an open dialogue about these limits. A place where businesses can indicate where their influence ends and where policy, trade policy or innovation policy may be needed to create alternatives. If we genuinely want to achieve societal impact, we must be prepared to have that conversation together.

Much energy within the Agreement is generated by concrete joint initiatives: collective action. When companies, NGOs and other partners work together to address a specific issue in a supply chain, the topic truly comes to life. The discussion moves beyond processes on paper and focuses on real dilemmas and choices in practice. This is where engagement grows, where collaboration becomes more rewarding and also, quite simply, fun.

The role of the government remains an important one as well. The link between the Agreement and procurement processes, for example in offshore wind tenders, has shown how powerful policy instruments can be when societal performance is taken into account. I hope that this approach will continue and expand in the years ahead.

Finally, I would like to express my appreciation for the Agreement's Secretariat. Their professionalism, precision and dedication provide stability and direction in what is a complex collaboration between many different parties. Evaluation results subscribe to the fact that their work is widely valued, and rightly so.

In the coming year we will continue to face the challenge of making full use of the collective strength of this Agreement. The foundations are in place. Now is the time to translate this collaboration more consistently into concrete societal impact.

Let us take that step together.

*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 | catalyst for change

Speeding up the transition to renewable energy is essential for meeting global ambitions for a sustainable and green economy. At the same time, the production, installation, and deployment of renewable energy technologies can pose risks to people, the environment and biodiversity. The supply chains behind these technologies are often complex and insufficiently transparent, making it difficult to identify, prevent and address negative impacts effectively.

Through the [International Responsible Business Conduct \(RBC\) Agreement for the Renewable Energy Sector](#), the signatories seek to improve transparency across renewable energy technology supply chains and to take concrete action - both collectively and individually - to address and remedy potential and actual adverse impacts.

The Agreement sets out shared and individual responsibilities for participating organisations, including companies, industry associations, trade unions, non-governmental organisations, knowledge institutions, the Dutch government and other relevant stakeholders such as contracting authorities and renewable energy technology platforms. Companies commit to implementing internationally recognised standards for responsible business conduct throughout their renewable energy operations. These standards include the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#) and the [UN Guiding Principles on Business and Human Rights](#). Other parties to the Agreement support and monitor company efforts and actively encourage the wider uptake and integration of responsible business conduct within the energy transition in their respective spheres of influence. Together parties initiate and implement impactful projects and activities to address human rights and environmental risks in the value chain that individual companies cannot tackle alone.



The Agreement undertakes outreach activities to expand the number of signatories, as well as raise awareness about responsible business conduct. Having a broader and more varied group of participants strengthens the collective influence of the signatories and enhances their ability to drive positive change across the supply chain. As a result, participation is [open to](#) relevant organisations, initiatives and companies operating at different stages of the renewable energy supply chain - both nationally and across Europe - that align with the Agreement's objectives.

The Agreement took effect on 1 May 2023 for a duration of five years, with the possibility of parties to extend. The Social and Economic Council of the Netherlands (SER) acts as the Agreement's secretariat, supporting its implementation and coordination.

Do you want to learn more?

Check out the [website](#).

Understanding the Human Rights and Environmental Due Diligence process

Certain 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 in turn may lead to adverse impacts.

By 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

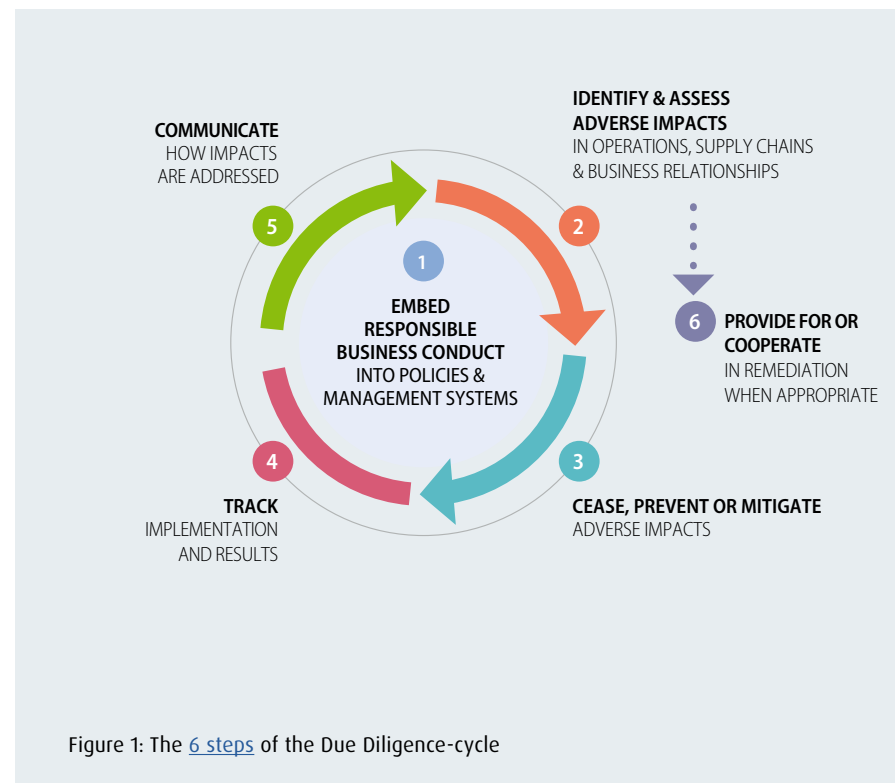


Figure 1: The 6 steps of the Due Diligence-cycle

For more information:

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



Year 3 in brief

Year 3 in brief | five major results

During the third year of the Agreement, the parties focused on piloting due diligence tools developed in previous years, implemented impact projects, and exchanged knowledge and expertise. In the third year the following five key results were delivered:

- 1. Progress in due diligence:** The Secretariat assessed the signatory companies to determine their progress in implementing due diligence practices. The results show progress in both the wind and solar sectors across all due diligence steps. The wind sector improved from 67% to 71%, while the solar sector showed a significant increase from 36% to 55% compared to the initial assessment. Further details regarding the methodology and assessment outcomes are provided later in the report.
- 2. Growth in numbers:** The number of signatories of the International RBC Agreement for the Renewable Energy Sector grew from 57 organisations to 65, including 45 companies. See the full list of [participants](#).
- 3. Risk assessments and research:** Agreement parties and the Secretariat developed a number of risk assessments for signatory companies. This includes inter alia:
 - Two risk assessments commissioned by the Secretariat and developed by a Sweden based non-profit organisation Globalworks on state-imposed forced labour and other working conditions in PV sector in China
 - A risk assessment on Lithium Iron Phosphate (LFP) and Nickel Manganese Cobalt (NMC) batteries developed by the Secretariat
 - Research by Agreement party Terre des Hommes Netherlands on whether mica is used in wind turbines and solar panels
 - Research on child labour in raw material value chains for bauxite from India, copper from Peru and nickel from Indonesia by Terre des Hommes Netherlands
 - Supply chain mapping and risk assessment in the Indonesian nickel supply chain commissioned by CNV International and developed by research organisation Profundo
 - A landscape-level study on nickel mining-related sustainability impact in

Indonesia, commissioned by Agreement party IUCN NL and developed by Dutch consultancy firm Mosaix

- 4. Mid-term evaluation:** KU Leuven, a Belgium based research institute, was commissioned by the Agreement parties to conduct the mid-term evaluation of the Agreement. This evaluation consisted of an outcome harvesting workshop, interviews, surveys, and document reviews, highlighting progress made by the parties and desired priorities for the second term of the Agreement.
- 5. Collective actions:** Parties implemented the following existing collective projects and initiated a number of new collective activities:
 - [Peru artisanal and small-scale copper project](#) – this project, aiming to integrate artisanal and small-scale copper mining into formal, globally responsible supply chains, entered into its final implementation year in 2026.
 - [Worker welfare project](#) – parties piloted the tools developed within this project throughout 2025 and organised a stakeholder engagement session in Brussels in collaboration with other multi-stakeholder initiatives.
 - Supply chain traceability project – Secretariat commissioned an external service provider to test blockchain and AI technology solutions aimed at improving supply chain traceability and ESG information. Two companies have volunteered to pilot these technologies in their aluminium supply chain.
 - Fair Impact Programme in copper supply chain in Peru and Chile – A project was prepared to address human rights and environmental impacts in the large-scale copper mining sector in Peru and Chile.
 - Due diligence in China – Following the risk assessments developed by Globalworks, parties engaged in a series of activities to improve the conditions in their supply chains.
 - Other explorations: Parties also started exploring potential collective action in steel and lithium. Furthermore, parties engaged in exploration about organisation of potential workshop series aimed at their direct suppliers on topics such as worker welfare and biodiversity. These collective actions will be concretised in Year 4.

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



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:** For companies, this entails that they improve their human rights and environmental due diligence practices. Other parties of the Agreement and the Secretariat monitor and support these improvements.
- 2. Collective Projects and Increasing Collective Leverage:** The Agreement encourages companies to initiate impactful projects and activities to address human rights and environmental risks in the supply chain that they cannot tackle as individual companies alone. By combining efforts, the solar and wind energy sectors aim to increase their collective influence 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.
- **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. It also organises a number of small group discussions on an ad-hoc basis, e.g.: small group discussions on batteries, solar focus group, cable group meetings, meetings of installers, monopiles, or vessels companies.

The Agreement includes the following governance bodies:

- **General Assembly:** bringing all the signatories of the Agreement together, during the General Assembly the parties review progress and set the priorities of the Agreement.
- **Steering Committee:** this multi-stakeholder governance body oversees administrative and governance matters and guides the Secretariat.
- **Renewable Energy Complaints and Disputes Committee:** This independent expert committee facilitates access to remedy for affected stakeholders.

The independent Secretariat, hosted by the Social and Economic Council of the Netherlands (SER), facilitates the Agreement.

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** serves as the main governance body within the Agreement, overseeing the enhancement of both individual company-level and collective sector-wide due diligence processes. It fulfils this role by developing due diligence tools and templates in close collaboration with the independent Secretariat, capturing lessons learned, identifying opportunities for collective action, and ensuring alignment with internationally recognised due diligence standards and guidelines. The Secretariat monitors companies to track and measure their progress.

The following sub-sections provide more information regarding different activities undertaken for monitoring and improving due diligence processes:

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 this is an annually conducted assessment, it also allows tracking of progress at both the company level and, in an 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](#). This framework was developed by companies, civil society organisations, and the Dutch government during the first year of the Agreement and approved by the Steering Committee. It gives guidance to the Secretariat on how to monitor the signatory companies.

The assessment process within the Agreement consists of three stages:

- **Completing a Due Diligence questionnaire:** companies complete an online self-assessment due diligence questionnaire consisting of 44 questions. The answers to this questionnaire are subsequently assessed and validated by the Secretariat. Companies receive scores based on the assessment.
- **Developing Due Diligence Action Plan:** companies develop and share their individual company due diligence action plans with the Secretariat. These action plans contain concrete steps which companies commit to undertake throughout the year in order to improve their scores.

- **Assessment interviews:** the Secretariat meets with relevant functions of the company (where relevant with sustainability, procurement, supply chain, management etc.) to have assessment conversations. The goal of these conversations is to discuss the current due diligence process and assessment results of given company and provide concrete advice as way forward.

Individual assessment scores of the companies, as well as their action plans, are confidential and are not shared with other parties or with external stakeholders.

The first assessment of companies (baseline assessment) within the Agreement was carried out during March – July 2024. The goal of the baseline assessment was to measure where companies stood when they started with the Agreement. The second assessment (progress assessment) was carried out during March – July 2025. The goal of the second assessment was to measure how much progress companies had made with regards to implementation of the six due diligence steps outlined in the OECD Guidance in the last year.

Companies participating in the Agreement select the sectoral (wind and/or solar) and geographical (national/international) scope of their due diligence commitments, arising from the Agreement. The assessment from the Agreement then focused on those activities within each company's scope as indicated at the start of their membership. For a full list of companies and their selected scope, see [here](#).

Results of the progress assessment

Building upon the 2024 baseline, the 2025 review shows that signatory companies are strengthening policies, processes, and practices. The assessment highlights broader adoption of risk-based due diligence, more systematic tracking of actions, and improved external communication on impacts. These improvements are visible in both sectors, with the solar segment showing especially significant maturation since its starting point last year.

Based on the assessment, the Secretariat prepared a Monitoring Progress Report (an internal Agreement document), which provides anonymised and aggregated assessment results, key gaps, and progress areas. Like the previous year, best practices of the companies were again compiled in [Monitoring Good Practices Report](#). Compared to the 2024 edition, the edition from 2025 contains completely different due diligence examples.

Aggregated assessment results for wind and solar sector respectively are shown below.

Wind sector

Table 1 shows the aggregated results for the wind sector.

Table 1. Wind sector general results

	General result	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Assessment results from 2024 (baseline assessment)	67%	77%	64%	65%	64%	82%	54%
Assessment results from 2025 (progress assessment)	71%	83%	70%	68%	65%	89%	57%
Growth (in percentage points)	+4% pt	+6% pt	+6% pt	+3% pt	+1% pt	+7% pt	+3% pt

Table 1 shows the wind sector recorded positive growth across nearly all due diligence steps, averaging around **4 percentage points**. Compared to the solar sector, this growth appears more moderate, reflecting the fact that the wind sector already started from a relatively advanced position. This translates into smaller, yet steadier improvements year-on-year.

The most significant progress was observed in **Step 5 (communicating how impacts are addressed)**, largely driven by preparations for upcoming sustainability legislation. The least progress was noted in **Step 4 (tracking implementation and results)**, where companies continue to face challenges in identifying suitable KPIs to measure the effectiveness of their due diligence efforts, particularly regarding capturing impacts across the value chain.

Solar sector

Table 2 shows the aggregated results for the solar sector.

Table 2. Solar sector general results

	General result	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6
Assessment results from 2024 (baseline assessment)	36%	45%	41%	40%	31%	32%	23%
Assessment results from 2025 (progress assessment)	55%	66%	58%	55%	51%	52%	35%
Growth (in percentage points)	+19% pt	+21% pt	+17% pt	+15% pt	+20% pt	+20% pt	+12% pt

Overall, the solar sector made **substantial progress** compared to the baseline year. This is largely because many companies were still at the early stages of their due diligence journey at this time, and significant improvements could be achieved by establishing basic systems and processes. In the coming years, this rapid growth is expected to level off into more gradual progress.

The strongest improvements were observed in **Step 1 (embedding due diligence in policies and management systems)**. Similar to the wind sector, this progress can partly be explained by the use of tools developed within the Agreement and the knowledge shared through sector-wide sessions on renewable energy supply chain risks. As a result, companies are devoting more attention to these issues and are increasingly monitoring their own activities. For larger solar companies, the CSRD has also been a key driver, supporting the development of more comprehensive due diligence risk assessments and contributing to higher scores.

Step 6 (providing for or cooperating in remediation) remains the most challenging step for the solar sector, as companies still focus on establishing the earlier steps of the due diligence process. Progress in this area is expected once more mature systems are in place.

Key takeaways from the assessment process

The Secretariat noted the following key takeaways from the progress assessment conducted in 2025:

- **Progress across both sectors:** Both wind and solar energy companies have strengthened their due diligence practices, showing measurable improvements since the baseline assessment. During the assessment process companies from both sectors acknowledged that participation in the Agreement had helped them in achieving the progress.
- **Legislation as a driver:** Upcoming sustainability legislation has helped focus attention on responsible business conduct (RBC) across organisations, leading to greater allocation of resources and capacity. The Agreement has supported companies in preparing for implementation of this legislation.
- **Value of collective learning:** The knowledge, expertise, and tools developed under the Agreement are actively supporting progress. Companies report that monitoring their performance is valuable and that shared resources and peer learning accelerate implementation of due diligence.

- **Remaining gaps:** Despite overall progress, challenges remain. Companies need to further strengthen access to remedy, ensure meaningful stakeholder engagement, and improve identification, mitigation, and tracking of impacts across their value chain. Many also highlight the need for practical tools and arguments to build buy-in internally and with business partners, and to better understand the limitations of certification schemes.

Next steps

Next steps for the Agreement include targeted efforts by the Secretariat and parties to address the remaining gaps identified in the progress assessment. This support will take the form of tailored sessions, collective projects, and sector-wide initiatives. Each participating company has submitted an action plan outlining how it intends to improve its performance over the coming year, and implementation of these plans will be monitored throughout 2025 and 2026. The next assessment, scheduled for 2026, will measure their progress and evaluate both the results achieved in 2025 and the implementation status of these action plans.



Due diligence activities | Knowledge sessions, peer learning, and training courses

The Agreement unites a wide range of parties, offering a wealth of knowledge and expertise that can be shared. Trade unions provide detailed insights into working conditions across different countries, while non-governmental organisations contribute guidance on human rights and environmental issues. The government shares expertise on the implementation of various due diligence regulations, and companies exchange their best practices with one another. The Agreement acts as a platform for all parties to share knowledge and learn from each other, offering mutual benefits: companies benefit from the expertise of civil society and government, while these organisations benefit by gaining a better understanding of the specific challenges faced by the sector, which in turn can inform their policies and activities.



Below follows a summary of the primary collective sessions held during Year 3, designed to raise awareness among participants about supply chain challenges and potential solutions.

■ **Knowledge session: Traceability in raw material supply chains (20 May 2025)**

This session provided insights into several collective projects and research activities under the Agreement: Profundo provided a presentation on supply chain mapping commissioned by the Agreement party CNV International. Mosaix shared findings from its research on the environmental impacts of nickel mining in Indonesia, commissioned by Agreement party IUCN NL. Lastly, the Secretariat presented the supply chain traceability project, which envisioned the use of blockchain and AI technologies to gather supply chain data. All these projects are described in more detail elsewhere in this report.

■ **Knowledge Session: Methodologies to assess human rights impacts (27 May 2025)**

This session, organised by Agreement party the Danish Institute for Human Rights, focused on the methodologies to measure human rights impacts in a company's value chain. It covered topics such as the definition and different types of human rights impact assessments, their role in company due diligence processes, the main steps involved and available tools and resources. The session also included a panel discussion with two external expert organisations, Ergon, and Pillar Two. This panel, facilitated by the Danish Institute for Human Rights, explored their experience in supporting companies in conducting human rights impact assessments.

■ **Knowledge Session: Implementation of EU Battery Regulation (30 June 2025)**

The purpose of this session was building joint awareness and aligning due diligence efforts of the Agreement parties on the implementation of EU Battery Regulation. The session included a comprehensive overview of the EU Battery Regulation and practical guidance on managing battery supply chain risks.

Breakout discussions facilitated parties' interactive learning and knowledge sharing. The session was also open for participation from companies outside the Agreement, aiming to increase awareness about the Agreement's activities.

- **Session on The Copper Mark (10 July 2025)**

The goal of this session was to acquaint the signatories of the Agreement with The Copper Mark, an assurance framework for responsible practices across the copper, molybdenum, nickel, and zinc value chains. Additionally, the session participants gained more information on the Consolidated Mining Standard Initiative.

- **Session on progress assessment results (9 September 2025)**

This session focused on presenting progress assessment results from 2025. During the session, the Secretariat presented aggregated scores for wind and solar sector, with detailed information of various sub-groups: developers, manufacturers, cable and network operators, vessels/monopiles/installers.

- **Session on responsible copper sourcing (30 October 2025)**

Together, The Copper Mark and the IRBC Agreement Secretariat hosted this session which was attended by over 100 participants, both from The Copper Mark and Agreement parties. Participants included downstream companies using copper in renewable energy equipment, upstream mining companies, civil society organisations, international organisations, and expert bodies. The parties gained overview of copper value chain ESG risks, discussed priorities from upstream, mid-stream and downstream copper actors, dived into decarbonization, chain of custody standards and pilots. During the session, The Copper Mark also introduced their Value Chain Initiative for renewable energy sector.

- **Knowledge Session: Decommissioning, circularity, and mitigation of environmental impacts (11 November 2025)**

The goal of this session, organised by the Agreement party the North Sea Foundation was to exchange insights on recent developments in decommissioning and circularity related to offshore wind and onshore solar, as well as to gain a clearer understanding of effective strategies for mitigating direct environmental impacts from offshore wind. During the first part of the session, the North Sea

Foundation facilitated a panel discussion on decommissioning and circularity. Netherlands Organisation for Applied Scientific Research (TNO), Sunrock and TKI Offshore Energy took part in the panel and shared their insights on the topic. During the second part of the session, the North Sea Foundation and Equinor gave a presentation about mitigation measures on environmental impacts related to offshore wind.

- **Due diligence training session (14 November 2025)**

Trade union CNV International organised a due diligence training on responsible business conduct in collaboration with the Secretariat. This training 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 18 participants.

- **Stakeholder Engagement Session: Decent working conditions in renewable energy sites in Europe (18 November 2025)**

This stakeholder engagement session was jointly organised by the Secretariats of IRBC Agreement for the Renewable Energy Sector and German Energy Sector Dialogue and took place in Brussels. The session was attended by a number of companies from Germany, the Netherlands, Belgium, Sweden, Denmark, as well as civil society organisations, multi-stakeholder initiatives, worker representatives, and government officials. More information about this session is provided in the Worker Welfare project update in this report.

- **Stakeholder Engagement Session: Lithium mining (27 November 2025)**

This session was held in the margins of small-group battery discussions within the Agreement which aimed to improve understanding of human rights and environmental risks in battery supply chains and taking relevant action to address these risks. During this session, Zimbabwe Environmental Law Association shared insights on the human rights and environmental impacts of lithium mining in Africa. The discussion provided an opportunity for parties to deepen their understanding of the effects of lithium extraction on people, the environment, and local communities.



- **Knowledge Session: Child labour in renewable energy supply chains (2 December 2025)**

During this session, Terre des Hommes NL gave a presentation about their two research projects: 1) use of mica in solar panels, wind turbines, and associated cables; 2) risk of child labour in 3 contexts: bauxite in India, nickel in the Philippines and copper in Peru. More information about these research projects can be found further down in this report.

- **Knowledge Session: Initiative for Responsible Mining Assurance and responsible sourcing (11 December 2025)**

Agreement party IUCN NL organised this session to provide an opportunity for parties to learn more about the Initiative for Responsible Mining Assurance, which is a credible, third-party assessment system for responsible mining. The session included a panel discussion between downstream company Fairphone and upstream mining company SQM.

- **Intervision Session: Access to Remedy (20 January 2026)**

This session focused on raising effectiveness of company remedy processes in renewable energy supply chains. During the intervision session participants gained introduction to the topic through a presentation by the Danish Institute

for Human Rights. This was followed by a brainstorm around case studies facilitated by Agreement parties SSE Renewables and TenneT.

- **Information session: Extraction of Rare Earth Minerals in Myanmar (26 January 2026)**

This session, jointly organised by the Secretariat and Agreement supporting organisation WindEurope, aimed to raise awareness of companies on the human rights and environmental due diligence risks related to the extraction of rare earth minerals in Myanmar. A number of international NGOs, including Earth Rights, Global Witness, Kachin Resource Concern Group, provided insights into the situation in Myanmar. This was followed by a facilitated discussion between companies and NGOs on the due diligence activities necessary to address the issue.

- **Roundtable on the use of audits and certification schemes (16 March 2026)**

This roundtable jointly organised by the Agreement parties the Danish Institute for Human Rights and IUCN NL focused on the role of audits and certification schemes as part of human rights and environmental due diligence processes. During the session, parties exchanged insights on current practices, challenges, and opportunities. The session included a brief presentation and interactive group discussions focused on a practical framework for companies to assess their use of audits and certification schemes.

- **Individual company stakeholder engagement sessions (September, December 2025)**

Two companies of the Agreement (TenneT and Hellenic Cables) requested the Secretariat to organise a stakeholder engagement session with specialized civil society organisations with regard to their own operations and supply chain issues. These meetings were organised by the Secretariat, in collaboration with the civil society organisations of the Agreement. The Secretariat also commissioned external consultants as needed, to support companies in these engagement sessions. Both companies appreciated this support provided through the Agreement. The Secretariat will continue to encourage Agreement signatories to engage with each other on human rights and environmental due diligence issues.

Mid-term Evaluation of the Agreement

In 2025, the Steering Committee of the Agreement assigned the Secretariat to conduct a mid-term evaluation of the Agreement by an independent evaluator. The core objective of the mid-term evaluation was independently assessing the Agreements' effectiveness in the past two and a half years and get recommendations for the two and a half years to come.

For this purpose, Secretariat launched a tender process to select an organisation to conduct the independent evaluation of the Agreement. A small committee, comprised of a number of Steering Committee members, selected the Belgium based research university KU Leuven for this assignment.

KU Leuven started the evaluation work in November 2025 and finalised in May 2026. The evaluation consisted of the following phases:

- 1 Inception:** KU Leuven started their evaluation with a kick-off workshop in December 2025. During this workshop, Steering Committee members engaged with the evaluators to foster buy-in and support from the outset of the evaluation process. Additionally, participants collaborated to reconstruct the theory of change.
- 2 Data collection:** Data collection was centred around four different methods:
 - **Document review:** This included a broad review of documents and studies generated in the context of the Agreement.
 - **Online surveys:** The evaluators conducted two surveys: one survey with Agreement participants and another survey with non-Agreement companies.
 - **Interviews with key informants:** This included a total of 4 scoping interviews and 28 semi-structured interviews with 40 respondents.
 - **Outcome harvesting workshop:** A workshop was held on 11 February 2026 to review and validate the preliminary outcomes, examine the underlying causal pathways and cluster the emerging themes together.

- **Case studies:** Several case studies were determined by the evaluators to showcase how RBC was integrated in companies and collective actions.

- 3 Reporting and communication:** This included the reporting of the findings and recommendations of the evaluation, combined with an executive summary.

The mid-term evaluation has provided the following conclusions: It highlighted that the Agreement had the characteristics of a potentially relevant multistakeholder initiative within the broader landscape of RBC. Its focus on a strategically important and expanding sector, combined with participation from a relatively broad set of actors across the value chain, provides a basis for collective learning and coordination. The Agreement's design—combining voluntary collaboration with emerging links to public procurement—has created incentives for company engagement, particularly in offshore wind, and has been supported by an effective secretariat and enabling role of the government.

At the same time, evaluation showed that progress to date had been mixed and remained uneven across objectives. The Agreement has contributed to improvements in company due diligence practices, increased awareness, and some integration of RBC considerations into public procurement, but results vary across sectors and companies. Evidence of concrete impact on supply chain risks and affected stakeholders is still limited, which is not unexpected at this stage but highlights the need for further development. As the Agreement evolves, key areas of attention include strengthening implementation beyond initial due diligence steps, improving transparency and alignment among stakeholders, and clarifying expectations around collective action to support a gradual shift from analysis to more consistent and measurable outcomes.

The recommendations from the mid-term evaluation focus on strengthening the Agreement's effectiveness by refining incentives, clarifying expectations, and improving alignment with both internal objectives and the external context. A key

priority is to avoid “premature graduation” in human rights due diligence (HRDD) by ensuring that high assessment scores are more closely linked to demonstrable progress on actual impacts. This involves gradually integrating more outcome-oriented elements into the assessment framework and reinforcing incentives—particularly through public procurement—to reward not only participation but also measurable improvements. In parallel, the evaluation highlights the need to create clearer conditions for effective collective action, including better monitoring of initiatives, more structured learning on what works, and increased transparency to support alignment and trust among stakeholders.

The recommendations also emphasise the importance of strengthening and differentiating incentives for sustained company engagement across sectors, notably by building on procurement mechanisms in offshore wind and exploring comparable approaches for solar. In addition, the Agreement is encouraged to make fuller use of its multistakeholder character by mobilising government involvement and external partnerships to address systemic risks that exceed the leverage of individual actors. Finally, continued alignment with evolving European and national regulatory frameworks is identified as essential to maintain relevance and coherence, ensuring that the Agreement remains a complementary instrument that supports companies in navigating both voluntary and mandatory RBC requirements.

The final report and findings can be found [here](#).

Due diligence tools

At the onset of the Agreement, the parties and the Secretariat developed about 30 tools together, which aimed at supporting companies in their human rights and environmental due diligence processes. These tools covered three directions:

- 1 Due diligence toolbox for beginner companies:** These tools aimed at equipping companies with necessary practical instruments to start their sustainability journey. It included human rights and environmental policy templates, codes of conduct, supplier assessment questionnaires, heat maps and etc.
- 2 Due diligence toolbox to address forced labour:** This toolbox aimed at equipping companies with necessary knowledge to address forced labour within their organisation and with their business partners. It included practical action steps and training materials, as well as guidance on engagement with suppliers.
- 3 Due diligence toolbox on worker welfare:** These tools aimed at equipping companies with necessary knowledge to identify, address and remedy adverse worker welfare conditions in renewable energy sites. It included tools such as training materials, complaints procedures, compilation of collective labour agreements, risk assessments, brochures and posters, inspection checklist and etc.

During Year 3, the focus was not on creation of new tools, but rather supporting companies in the implementation of these existing tools. Therefore, the Secretariat focused on increasing awareness and encouraging companies to utilize the tools. This was done through individual conversations with companies where they were directed to different tools based on their due diligence challenges.

The monitoring process conducted by the Agreement, as well as mid-term evaluation of the Agreement showed that companies appreciated the existence of these tools and made use of them in their work.

In addition, several companies outside the Agreement, with whom worker welfare tools were shared during the public consultation process, indicated that they made use of them and expressed their appreciation for the availability and usefulness of these tools.

Collective actions | Collective projects and increasing collective leverage

The renewable energy sector relies on supply chains that are extensive and multi-layered, which makes addressing negative impacts particularly challenging. Many of these challenges cannot be resolved by individual actors acting alone and instead call for joint efforts. The Agreement serves as a platform that enables such collaboration and allows its parties to work together on collective impact projects. An impact project can be launched when a minimum of two parties to the Agreement decide to collaborate, which lowers the threshold for participation and actively encourages joint action and wider involvement.

The Working Group on Collective Actions and Increasing Leverage oversees these collaborations. In addition, this Working Group plays a key role in strengthening the Agreement by leading efforts on outreach and recruitment of new parties. This is mainly done through, participation in different outreach and networking events where Agreement is highlighted.

Collective activities

During Year 3, parties of the Agreement continued working on existing collective projects, as well as embarked on exploration of new project ideas. Below is a summary of key activities per collective project.

Peru Artisanal and Small-Scale Copper Mining Project

The Peru Artisanal and Small-Scale Copper Mining Project was initiated on 1 May 2024 and will run until end of February 2027. The project is funded by the [European Partnership for Responsible Minerals](#) (EPRM). Agreement parties Sunrock and the Danish Institute for Human Rights together with the Secretariat are the official project parties. Along with them several other companies of the

Agreement take active part in the project. The project is implemented by [Alliance for Responsible Mining](#), a leading expert organisation on artisanal and small-scale mining. Initiative for Responsible Mining Assurance (IRMA) is another project partner.

The goal of the project is to integrate artisanal and small-scale copper mining (ASCM) in Peru into global responsible supply chains in Peru. The project addresses key challenges such as human rights and environmental risks and informality in the ASCM sector. Activities envisaged in the project include multi-stakeholder dialogues, development of a shared roadmap, implementation of improvement plans, [CRAFT Code](#) engagement, market linkage efforts, and policy outreach. Expected outcomes include formalising ASCM organisations, increasing stakeholder engagement on gender, human rights, and environmental issues, and developing knowledge products to support responsible sourcing.

In June 2025, a delegation visited Peru. Over the course of a week, this delegation visited two ASCM sites and a processing facility in the Nazca region, to observe working conditions and environmental practices first hand. They also engaged with local miners, workers of processing facilities, women's cooperatives, and regional mining experts.

Following these site visits, the delegation met in Lima for a multi-stakeholder roundtable involving representatives from the Peruvian government, civil society, Indigenous organisations, financial institutions, and the mining sector. The discussions underscored the need to address barriers to formalisation, improve access to finance, strengthen environmental and human rights practices, and ensure that Indigenous Peoples and local communities are meaningfully involved in decision-making. Participants also highlighted the importance of reducing power imbalances between artisanal and large-scale mining actors and creating clearer pathways for ASCM integration into responsible copper supply chains.

Building on the findings from the field visit, the Secretariat, in collaboration with project partners, prepared a [field visit report](#) and a set of recommendations for Agreement parties. These findings and recommendations were presented during an Agreement session on 3 February 2026. For 2027, a follow-up field visit and multi-stakeholder dialogue are planned.

In parallel, project partners developed a policy brief in 2025 titled "[Joint vision for the inclusion of ASM copper in responsible supply chains in Peru.](#)"

Also, two dedicated working groups were created. One to establish a shared understanding of the human rights risk landscape in the ASCM in Peru and formulate actions to tackle these issues, and another to facilitate discussions on gender. Both working groups will convene in 2026.

Finally, during the initial phase of project implementation, participating mining sites were assessed against the CRAFT Code and corresponding improvement plans were developed. These improvement plans were implemented throughout 2025 and 2026 with the support of project partners. The Alliance for Responsible Mining provided the mining sites with the necessary training on various aspects of operational health and safety, environmental and human rights aspects.

Following the implementation of this project, the Agreement and a number of individual member companies contributed financially and in-kind to electrification project of three artisanal and small scale mines in Peru to provide access to electricity. This initiative is led by member company Sunrock and will be implemented in 2026.

The project is expected to run until the end of February 2027. More information about the project can be found [here](#).



Worker Welfare Project

The [Worker Welfare Project](#) of the Agreement focuses on improving labour conditions for migrant and posted workers involved in renewable energy construction projects in Europe. The project addresses key risks such as underpayment, excessive working hours, unsafe working and living conditions, discrimination, and potential labour exploitation.

By bringing together energy companies, trade unions, NGOs and human rights experts, the initiative seeks to promote responsible employment practices and support compliance with evolving EU legislation, including due-diligence and worker protection directives.

A key outcome of the project was the Worker Welfare Toolbox, which was developed in 2024. This toolbox provides twenty practical tools to help companies identify risks, prevent abuses, and establish effective remediation and grievance

mechanisms throughout their supply chains. It includes training modules for staff, contractors and workers, templates for complaints procedures and notification mechanisms, risk assessment and remediation plans, code of conduct for worker welfare and etc.

During 2025, companies within the Agreement, as well as outside the Agreement, piloted these tools in their organisation. Companies could choose which tools they wanted to pilot. An evaluation of the toolbox will be completed in 2026. Feedback received during the evaluation will be used to further improve the toolbox and re-launch the final version over the course of 2026.

Aside from the toolbox, the Secretariat also organised two stakeholder-engagement sessions between companies and worker representatives throughout the project. The first engagement session happened online in November 2024, while the second engagement session took place in Brussels in November 2025.

The Brussels event brought together representatives from businesses, trade union federations, business associations, academia, non-governmental and governmental institutions, and consulting. The German Energy Sector Dialogue and German Federal Ministry of Labour and Social Affairs organised this event together with the International RBC Agreement for the Renewable Energy Sector and the Dutch Ministry of Foreign Affairs. It featured a keynote on insights from investigative journalism on labour exploitation at construction sites in Germany. This set the scene for a panel discussion on how companies can improve accountability and responsibility for decent work in construction. During ideation workshops, participants had the chance to identify shared challenges across European markets and brainstorm possible solutions and entry points for collaborative approaches and corporate due diligence practices. In summary, the event showed that labour exploitation and forced labour at construction sites in the energy sector are extant issues in many European countries. To advance decent work in construction, this calls for a shift from fragmented compliance

efforts towards a systemic approach that embeds worker protection, responsible recruitment, and enforceable accountability throughout the entire subcontracting chain. Companies can only effectively fulfil their due diligence obligations in cooperation with other stakeholders and across national borders.

Globalworks solar PV research

By signing the Agreement, companies commit to conducting risk-based due diligence in line with the [OECD Due Diligence Guidance for Responsible Business Conduct](#). The European solar industry faces challenges in conducting effective due diligence, due to the complexities in the supply chain regarding sourcing essential raw materials. Thus, Agreement tries to seek alternative approaches to support companies in meeting their due diligence expectations arising from international standards such as OECD Guidelines for Multinational Enterprises and UN Guiding Principles on Business and Human Rights.

For this purpose, the Secretariat of the Agreement commissioned [Globalworks](#), a Swedish non-profit organisation, to produce two independent studies on the photovoltaic (PV) sector in China:

- The first report analyses the issue of *state-imposed forced labour*.
- The second report examines *working conditions and labour rights violations* in the sector.

Both reports were produced independently by Globalworks, and without any intervention in the research process by or influence of the findings from either the parties to the Agreement or the Secretariat. The views and conclusions expressed in the reports solely belong to of Globalworks.

The Globalworks reports provide a valuable resource for companies to strengthen their understanding of labour and human rights risks in China's PV sector. Based on the Globalworks reports, parties to the Agreement will take a set of coordinated actions aimed at increasing awareness, strengthening due diligence,

and enhancing collective leverage in relation to human rights risks in the Chinese PV sector. In the short term, this includes organising targeted sessions to build understanding of the Chinese context and labour risks. Companies are expected to integrate the findings into their human rights due diligence processes, reflect them in their action plans, and report on progress through existing monitoring mechanisms. These steps are intended to support more informed risk identification and mitigation. In parallel, parties will focus on strengthening stakeholder engagement and collective action. This includes outreach to supply chain partners, collaboration with international initiatives and sector platforms, and dialogue with public authorities and European stakeholders. Efforts will also be made to translate report findings into practical tools and guidance, pilot joint approaches (for example on excessive working hours) with Agreement parties, and prioritise key risk areas for further action. Over time, these activities are expected to contribute to greater alignment among stakeholders, more consistent company practices, and increased leverage to address systemic labour risks in the sector.

Supply chain traceability project

The renewable energy sector depends on highly complex, multi-tiered global supply chains, yet transparency remains a significant challenge. Many human rights and environmental risks occur far upstream, particularly in the extraction and processing of key materials often in regions with weak labour and environmental protections. At the same time, supply chains are vast and fragmented — a wind sector company may have tens of thousands of Tier-1 suppliers alone — making traditional tracking methods unworkable. Increasing regulatory and investor expectations, including EU due diligence requirements, further underscores the urgency for more robust supply chain visibility.

In response to these challenges, the Secretariat of the Agreement has worked with several companies of the Agreement to develop a targeted project on supply chain traceability, addressing a key gap identified through the monitoring

process and aligning with the Agreement’s stated priorities. The project focuses on aluminium - a critical input for renewable energy infrastructure - and seeks to test innovative approaches to mapping its origin. Two pilot projects are planned: the first tracing aluminium used in tower internals, and the second focusing on aluminium used in cables. Given aluminium’s opaque and highly intermediated supply chain, characterized by commodity mixing and limited digital traceability, these pilots offer an important opportunity to assess practical solutions. The project will analyse how blockchain-enabled data systems with limited support of AI can support companies’ supply chain traceability efforts. The initiative aims to generate concrete insights into their effectiveness, cost, and scalability. Expected outcomes include improved traceability and due diligence for participating companies, greater visibility and impact management for wind park developers, and valuable evidence to inform future collective actions across the wind—and potentially solar—sectors.

The project is financed through the Agreement budget. Minespider was selected as the service provider through a competitive tender process. The project officially started on 2 February 2026 and is expected to be finalised in 2027. A mid-term evaluation is planned to be done in autumn 2026.

Mica research

Agreement party Terre des Hommes Netherlands (TdH NL) works to prevent child exploitation and protect children from hazardous labour, e.g. through its longstanding focus on child labour in mica mining. In countries such as India and Madagascar, mica is often extracted under informal and unregulated conditions, exposing children and adults to severe health risks and exploitation; [joint research](#) by TdH NL and SOMO in 2016 and 2019 estimated that 22,000 children in India and 11,000 in Madagascar are involved in mica mining. As global demand for mica continues to rise alongside the energy transition - driven by its use in electric vehicle batteries and its potential application in wind and solar technologies - TdH NL undertook targeted research within the Agreement to assess whether and

how mica is used in wind turbines and solar panels, including its applications, volumes, types, and countries of origin. The research was funded by the Netherlands Enterprise Agency and combined a desk-based analysis, a review of Environmental Product Declarations, and laboratory testing. The findings of the research were shared with Agreement parties during a dedicated knowledge session in December 2025.

The study found that, based on desktop research, mica may be present in solar panel components such as encapsulation materials, back sheets or back glass, and junction boxes, as well as in wind turbine components including blades, generators, power converters, electrical control and disconnection systems, gearboxes, transformers, and nacelle frames. Additional potential applications in the renewable energy sector include coatings, paints, and insulation materials. While the Environmental Product Declarations reviewed did not explicitly mention mica, these documents also did not consistently list all materials and tended to become less detailed over time. Moreover, much of the academic literature focused on experimental studies which demonstrated promising results from incorporating mica into various materials and often recommended its application within renewable energy technologies. TdH also tested cable for mica in a laboratory; however, lab analysis did not find mica in the sample analysed. As a next step, TdH will test parts of solar panels for mica in a laboratory. Results of the research and lab analysis will be published in Year 4.

Child labour in critical raw materials mining research

Agreement party TdH NL continued its work on preventing child labour in mineral supply chains by addressing the limited understanding of children's involvement in critical mineral mining. Building on desktop research conducted in 2024, which highlighted significant data gaps and the difficulty of obtaining reliable information on child labour in mining, TdH NL initiated further exploratory research to better understand conditions on the ground. The exploratory research was funded by the Netherlands Enterprise Agency and focused on minerals and

sourcing countries relevant to Agreement parties, applying a targeted and cost-effective approach to generate initial evidence that could inform more in-depth, field-based research in the future.

The research concentrated on aluminium in India, nickel in the Philippines, and copper in Peru, although the scope of the Peru research was relatively narrow. The study included desk-based stakeholder mapping to identify organisations working on child labour, critical mineral mining, and related issues at local, national, and international levels. TdH NL then conducted (approx. 10-12) qualitative interviews with various stakeholders, including community actors, local and national organisations, academics, and subject-matter experts, to explore indications of child labour in critical mineral extraction.

The findings from stakeholder mapping and interviews were synthesised in a final analysis, highlighting the presence or absence of child labour, key trends, information gaps, and areas requiring further investigation. Overall, this exploratory research provided an important first step in strengthening the evidence base on child labour risks in critical mineral supply chains and supported informed decision-making on potential follow-up research and actions within the Agreement. The research was presented to the Agreement parties in December 2025 and can be accessed [here](#).

Nickel research

Nickel is a critical mineral for the energy transition, used in electric vehicle batteries and renewable energy technologies, but its extraction and processing in Indonesia are linked to serious human rights abuses, such as poor labour conditions, restricted freedom of association, and occupational health hazards, as well as environmental degradation including deforestation, soil erosion, and water pollution. Thus, Agreement parties CNV International and IUCN NL conducted several studies on nickel mining in Indonesia throughout 2025. The findings of the research were published in two reports:

- [The Destructive Indonesian Nickel Supply Chain: a supply chain mapping and risk assessment](#) commissioned by CNV International and developed by research organisation Profundo;
- [A study on nickel mining-related sustainability impact at landscape-level in Morowali, Indonesia](#), commissioned by Agreement party IUCN NL and developed by Dutch consultancy firm Mosaix.

The first report, *The Destructive Indonesian Nickel Supply Chain*, maps and assesses social and environmental risks in the nickel supply chain originating from Morowali and surrounding industrial areas in Central Sulawesi, Indonesia as the world's largest nickel producer. The research highlights the opaque nature of the nickel supply chain, the difficulty for downstream renewable energy firms to trace Indonesian nickel to end products, and the urgency for greater supply chain transparency considering EU due diligence regulations. The study also includes strategic recommendations for companies in the renewable energy and



electric vehicle sectors, urging enhanced human rights due diligence, improved traceability, engagement with suppliers to mitigate social and environmental risks, and increased public disclosure of supply chain information. It emphasises that even small quantities of nickel can have significant impacts and underscores the need for robust corporate action and collaboration to ensure ethical sourcing practices.

The second report, *Nickel-mining related sustainability impact*, examines the environmental and community impacts of nickel mining in Morowali. Using spatial data and industry analysis, the study finds that Morowali hosts numerous mining concessions and smelter, dominated by the Indonesia Morowali Industrial Park (IMIP), and that mining activities have significantly disturbed large areas of land. Around 77% of the concession areas overlap with undisturbed tropical forest, with substantial deforestation, limited post-mining restoration, and widespread soil runoff that damages coastal ecosystems such as coral reefs, seagrasses, and mangroves. The report also highlights heavy coal reliance in smelting operations, contributing to greenhouse gas emissions. On the social side, nickel mining brings economic activity but also poses serious risks to local communities, including threats to traditional livelihoods, coastal fisheries, and increased vulnerability to landslides and water pollution. The study notes that sustainability governance is weak: few companies have public sustainability policies, supply chain transparency is very low, and grievance mechanisms are largely absent. Like the first report, this study also recommends that renewable energy sector companies strengthen due diligence by setting clear expectations for upstream suppliers, improving transparency, engaging in multi-stakeholder collaboration, and supporting responsible mining practices to mitigate these landscape-level risks.

Both research reports were presented to the Agreement parties in May 2025. Efforts to develop further collective actions based on the studies have unfortunately stalled so far, due to conflicting priorities and lack of transparency in the sector.

Fair Impact Programme in the Copper Supply Chain in Peru and Chile

The Fair Impact Programme in the copper supply chain in Peru and Chile is a proposed collective impact initiative led by Agreement party CNV International in partnership with Stedin, Sunrock, TKF, TenneT, Alliander and IUCN NL. The project is expected to start in 2026 and run into 2029. The project focuses on copper as a critical mineral for the energy transition, with activities centred in the large-scale copper mines in Arequipa region in Peru and the Atacama region in Chile; two of the world's most important copper-producing areas. The core objective is to strengthen human rights and environmental due diligence in the copper supply chain through multistakeholder dialogue and collective action, while improving transparency, traceability, and working conditions in mining operations. The project for Peru activities is expected to be funded by a subsidy from The Netherlands Enterprise Agency and Agreement parties are exploring additional funding opportunities for the activities in Chile, as Chile is not covered by Sesam subsidy.

The project responds to well-documented social and environmental risks in the copper sector, including child labour, occupational health and safety hazards, restrictions on freedom of association, water scarcity, environmental degradation, and threats to indigenous peoples and local communities. Drawing on CNV International's longstanding engagement with trade unions in the mining sector and IUCN NL's expertise in biodiversity and environmental impacts, the programme places worker-driven data and social dialogue at its core. Tools such as the [Fair Work Monitor](#), and joint field visits will be used to further identify risks, elevate worker and community voices, and facilitate meaningful engagement between companies, unions, and civil society actors across the supply chain.

Structured around five phases - preparation, exploration, multistakeholder dialogue, implementation, and monitoring - the programme aims to deliver a concrete collective action plan to mitigate adverse impacts and strengthen labour rights. Activities will include supply chain research, stakeholder and supplier

engagement, training on occupational health and safety and social dialogue, and targeted interventions based on identified risks, with a strong focus on vulnerable groups such as subcontracted workers, women, and indigenous communities. By documenting lessons learned and outcomes, the project also seeks to serve as a blueprint for responsible sourcing and collective action in copper and other high-risk material supply chains within the Agreement.

Additional potential activities

Agreement parties are also interested in developing other collective actions and projects. With the goal to explore potential topics for collective activities, a series of sessions have been taking place throughout 2025 and 2026 in small groups: e.g. a small group for batteries, cable companies, installers, vessel and monopile producing companies.

On 17 March 2026, a collective session on collaboration and action was jointly organised by the civil society organisations and companies aimed to recalibrate prioritised collective actions around material issues. During the session, parties dived into possible collective actions on steel and lithium, as well as explored refinement of existing collective actions on Globalworks reports, copper projects and supply chain traceability project. Based on their scope, such potential activities could be either funded through the Agreement budget or through external sources such as subsidies.

Increasing Leverage

Besides initiating and carrying out collective projects, the Working Group on Collective Actions and Increasing Leverage is responsible for recruiting new parties and for outreach activities. This recruitment aims to enhance the Agreement parties' collective influence, enabling the sector to more effectively address negative impacts throughout the supply chain.

Membership

Throughout implementation Year 3 the Secretariat and various Agreement parties, including the government, companies and civil society organisations carried out various outreach activities to recruit new parties. As a result, the signatories of the Agreement reached to 65 organisations, including 45 companies. This is a significant increase compared to the start of the Agreement in 2023, when the number of signatories was 34 organisations, including 16 companies.

During 2025, one civil society organisation – Oxfam Novib – joined the Agreement, bringing the number of civil society organisations, trade unions, and knowledge institutions in the Agreement to seven. However, in early 2026 the North Sea Foundation requested termination its membership due to strategic shifts in the organisational focus and limited capacity. This will be further formalised during implementation Year 4.

The following companies joined the Agreement membership in Year 3: CS Wind Offshore A/S, Deme Offshore Holding NV, Hellenic Cables SA, Maersk Offshore Wind, Prysmian Powerlink S.r.l, Stedin Netbeheer B.V, Stakraft AS, Boskalis Offshore Wind Nederland B.V., Alliander N.V and DeepOcean AS. See the full list of [participants](#) on the website.

In Year 3, the following companies unfortunately had to terminate their membership of the Agreement due to capacity and budget restraints, and challenging market conditions: GE Offshore Wind, ZonUnie Development and Natec Sunergy BV.

Outreach activities

Agreement parties and the Secretariat also engaged in a number of outreach activities to raise awareness about due diligence and Agreement activities.

Below is a summary of the outreach events organised or attended by the Agreement parties and the Secretariat in Year 3:

- **OECD Forum on Responsible Mineral Supply Chains (5-7 May 2025):** The Secretariat connected with a number of international stakeholders during the event and provided a presentation during a workshop organised by the Business and Human Rights Resource Centre on responsible mineral sourcing for wind, solar and EV companies.
- **Presentation to Alliance for Responsible Green Energy (23 October 2025):** This initiative, established in Denmark in 2025, has similar goals as the Agreement. Both initiatives also have joint members. As such, it is important to align the efforts. In this particular session, the Secretariat shared more information about current and potential collective projects within the Agreement to gauge interest for potential collaboration.
- **UN Forum on Business and Human Rights (25 – 27 November 2025):** 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 participated in a session organised by the Danish Institute for Human Rights bringing together different organisations and multi-stakeholder initiatives working on human rights due diligence in renewable energy sector.
- **Other outreach moments:** Agreement parties and the Secretariat also used events and sessions organised by the Agreement for outreach purposes. This included inter alia Responsible Copper Sourcing event jointly organised with The Copper Mark on 30 October 2025, Due Diligence Training organised on 14 November 2025 and made open to non-Agreement parties, Stakeholder Engagement Session on Decent Working Conditions organised jointly with the German Energy Sector Dialogue on 18 November 2025 in Brussels. Also, in the Netherlands, presentations were held about the Agreement within the Dutch Ministries of Climate and Green Growth, as well as Dutch Ministry of Foreign Affairs. The chair of the Agreement also met with the de-commissioned

minister of Climate and Green Growth in June 2025 and held a presentation about the Agreement for wind sector representatives during Q-meeting, a networking event for offshore wind in the Netherlands.

- Outreach meetings with multi-stakeholder initiatives: During implementation Year 3, regular outreach meetings with the multi-stakeholder initiatives in Germany, Denmark and Sweden were organised. Many of the signatory companies in the Agreement have their headquarters in these countries. Several initiatives in these countries also tackle various 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. In addition, the IRBC Agreement parties are also collaborating with Sector Dialogue Automotive Industry in Germany on topics such as conducting due diligence in high-complex supply chains.
- Outreach with hydrogen sector: During the implementation Year 3, parties have further explored potential expansion of the Agreement to green hydrogen sector. In this context the Dutch Ministry of Foreign Affairs had several bilateral meetings with the industry association NL Hydrogen and the Secretariat. The Secretariat and the Dutch Ministry of Foreign Affairs also provided a presentation during an event organised by Sustainable Hydrogen Import Programme Netherlands (Ship NL) on 9 July 2025. There is a potential synergy to collaborate 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 of the Agreement.

4.3 Access to remedy | Renewable energy complaints and disputes committee

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.

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

No disputes or complaints were submitted to the REDC during Implementation Year 3. However, considering that access to remedy was identified as one of the key challenges within the sector, an intervision session, dedicated to the topic, was held in January 2026.



Looking forward to year 4

Looking forward to year 4 | Preview and priorities

Looking ahead to Year 4, the following activities are being planned:

Assessment process

In Year 4, the Secretariat will finalise the third due diligence assessment of participating companies. The results will be aggregated, anonymised and used to prepare a progress monitoring report, which will be presented to the Working Group on Due Diligence. The outcomes of this assessment will inform the priority focus areas of the Agreement for the subsequent year.

Collective projects and actions

Existing collective projects will continue to be implemented and finalised. The Secretariat will integrate the feedback received on the Worker Welfare project toolbox, finalise the toolbox and make it available for interested stakeholders. The Peru Copper ASM project will be completed early 2027, including an additional field visit to Peru. The project on supply chain traceability will continue, with a defined go/no-go decision point. Secretariat will work with companies of the Agreement to implement the findings from risk assessments on Chinese PV sector developed by Globalworks.

Parties will also launch a few other projects and research: e.g. Fair Impact Project on copper supply chains in Peru and Chile is expected to be launched during Year 4. Parties will also further explore and refine projects on lithium and steel. A series of supplier workshops will be organised in 2026 and 2027 to engage the supply chain on RBC topics.

Knowledge and awareness raising, peer learning and trainings

The Agreement will continue to strengthen capacity building through targeted knowledge sessions and trainings. Planned activities include sessions on evolving RBC and sustainability legislation (such as CSRD, CSDDD and Forced Labour Regulation), due diligence trainings for companies and suppliers (online and/or in person), and thematic discussions on human rights, environment, and biodiversity topics (e.g. biodiversity net gain and responsible mineral sourcing).

Peer learning will be further supported through intervision sessions focused on impact identification and prioritisation, internal buy-in for RBC, and meaningful stakeholder engagement along the value chain.

Implementation of mid-term evaluation results

The conducted mid-term review of the Agreement will be presented and discussed. The results will guide potential improvements to governance, activities and focus areas, inform future planning.

Possible extension of the IRBC Agreement

Based on the interests of the parties, a small committee will be established to develop a future vision for a potential extension of the Agreement. The findings and recommendations of the mid-term evaluation will serve as key inputs for this process. Parties are expected to decide on an extension of the Agreement in 2026.

Interviews and Statements

Sif Lois Frahm

Oxfam Novib Jacqueline Persson and Eline Achterberg

TenneT Akshaya Prabakar

Dutch Government

Terre des Hommes Netherlands Kristina Ullrich

Sunbeam Luuk Eeftink

FNV Vivian Vaessen



Lois Isa Frahm

Public Affairs Manager

Joining the IRBC Agreement for the Renewable Energy Sector was the push Sif Group needed to start looking differently at its supply chain. ‘We are a typical industrial company,’ says Lois Isa Frahm, Public Affairs Manager at Sif. ‘The Agreement opened our eyes. And to be honest: without it, we probably would not have taken a number of these steps at this time.’

‘It was the nudge we needed.’

The initial reason for joining was pragmatic. Participation in the Agreement plays a role in offshore wind tenders, in which Sif - a European market leader in the production of monopiles for wind turbines - wanted to continue competing. ‘That was the nudge in the right direction,’ Frahm says. But what started as a necessity soon became something much bigger. ‘Once we had joined, we realised how impactful the Agreement actually is, and how important it is to have broad representation from across the sector.’

Opening minds and broadening perspectives

According to Frahm, the Agreement’s greatest impact has been opening minds and broadening perspectives within the company and its value chain. Sif has a relatively straightforward supply chain with a limited number of core components. ‘We had long-standing relationships with suppliers, and precisely because of that, we asked

very few critical questions before signing the Agreement. It forced us to change that: no longer just saying “this is our regular supplier, so it must be fine” but really asking where, for example, their critical raw materials actually come from.’ Those questions led to new insights around dependencies and critical raw materials. ‘Human rights risks often sit deeper in the supply chain, for example at mine level. There is still a lot of work to be done there.’ At the same time, geopolitics play a role. ‘We do not want to run the risk of becoming dependent on a single country. That makes it complex.’

This is where the strength of the Agreement became clear. ‘Within the Agreement, concrete actions are being developed around critical raw materials. That helps enormously, especially now that Europe is becoming increasingly active on this topic.’ The due diligence workshops also proved valuable in supporting conversations with suppliers. ►

Structure and commitment to action

Joining the Agreement led Sif to establish a cross-departmental team, bringing together procurement, sustainability, risk & compliance, and public affairs to take effective action. 'You receive a score, but you also have to submit an annual action plan. That means hard commitments and actually taking action' The Agreement also helped Sif to formalise the topics audits and reporting,

and to introduce new policies, including a dedicated environmental policy.

According to Frahm, this has a direct impact on relationships with suppliers: 'You have different conversations. Not just commercial ones, but discussions about the long term. Sometimes that means we are "that sceptical Sif" again, asking tough questions. But in the end, it leads to better relationships.'

Taking the next step

Once it became clear how much momentum the Agreement was generating, Sif decided to take the next step: joining the Steering Committee of the RBC Agreement for the Renewable Energy Sector. 'I simply knocked on the door,' Frahm says, 'with the idea that it might be valuable to have someone looking at things through a different lens, from a company that joined later and represents a different part of the value chain.' That perspective was welcomed. 'The Steering Committee holds discussions of very high quality,' she says, 'And we can play a role in better positioning the Agreement towards policymakers.' According to Frahm, the Agreement still needs greater visibility: 'More 'marketing' is needed to show how valuable this really is.'

Getting better all the time

Sif sees itself as a company in development. 'We do not consider ourselves good enough yet, but we are getting better all the time.' The biggest challenge lies in looking further down the supply chain and bringing suppliers along. At the same time, Frahm sees opportunities, particularly at the European level, where responsible business conduct and critical raw materials are rising on the agenda.

For Frahm, the direction is clear. 'This is the future. It has to happen. No way back.' The Agreement has played a lasting role in that journey. 'What started as a nudge has fundamentally changed how we look at our supply chain and how we take responsibility.'





Jacqueline Persson

Climate specialist



Eline Achterberg

Policy Lead Human Rights
and Businesses

As penholder for the civil society organisations, trade unions and knowledge institutions, Oxfam Novib joined the IRBC Agreement for the Renewable Energy Sector in September 2025. Jacqueline Persson, climate expert on Just Energy Transition, and Eline Achterberg, Policy Advisor on Business and Human Rights, are leading the work on behalf of Oxfam Novib, which operates in eighty countries and has two decades of experience with raw materials and extraction.

For Oxfam Novib, the energy transition is not only about climate goals, but also about justice. The transition to renewable energy requires enormous quantities of raw materials, and this is precisely where new risks arise for people and communities around the world. 'Not only climate change itself affects some groups more than others,' Persson explains, 'but the transition itself also has winners and losers. That is why we work towards a Just Energy Transition in which no one is left behind.' The focus on critical minerals made joining the Agreement a logical step.

'We are shifting power to the community'

From knowledge sharing to action

The Agreement offers Persson and Achterberg direct access to companies that genuinely want to move forward. 'Through the Agreement we can sit at the table with companies, face to face. The Agreement helps us to work together towards real impact. That's why we decided to become a critical member of the Agreement,' Persson says. 'We are very aware that we are stepping onto a moving train,' she continues. 'We are moving to phase two: impact.' Achterberg observes: 'You can see a turning point where both civil society organisations and companies say: "okay, now we really need action."' 'As one of the companies puts it,' Persson adds, "'By now we know the problems pretty well and spent enough time on webinars and trainings. Now it is time for action!'" ►

The arrival of European due diligence legislation (CSDDD) reinforces the urgency, according to Achterberg: ‘There are certainly companies who already have very extensive due diligence processes. But there’s also a large group that has been waiting for legislation. They can no longer stay behind.’ At the same time, mapping the entire supply chain remains difficult. ‘Fortunately, more and more companies say: “there’s no time to first get a full overview of our whole supply chain. We must act now “;” adds Achterberg. ‘We need companies that dare to act. Learning as you go.’

Putting communities’ voices at the centre

Oxfam Novib works to ensure that rights of people in the supply chain directly affected by mining and raw material extraction, are not neglected. ‘Engagement with rightsholders is both our greatest added value and our biggest concern,’ says Persson. Central to this is the principle of Free Prior and Informed Consent (FPIC): the right of communities to participate in decisions about projects that affect their lives directly. ‘The new European CSDDD law requires Dutch companies that source critical minerals from countries like Peru and the DRC to take full responsibility for human rights abuses in their entire supply chains. However, it is near impossible for affected local communities to discover which Dutch company is responsible for negative impacts they encounter,’ Achterberg explains, ‘That is an important role for us – to connect companies and affected local communities.’



Community-based impact assessment

When companies organise consultations themselves, the most vulnerable groups (informal workers and children) are often not reached. ‘Companies then come up with action plans that are disconnected from the real, daily needs of people in that supply chain. In the end that is very inefficient,’ says Achterberg. The solution Oxfam Novib proposes is a community-based impact assessment, a method it already applies in other sectors. ‘Instead of companies assessing their impact, the affected communities themselves assess the impact on their lives. This shifts power towards the community,’ says Achterberg, ‘while it normally depends heavily on the company’s top-down process.’

Together with CNV International and IUCN NL, Oxfam Novib is exploring the development of a new project around copper in Peru in which this methodology will be applied and further developed. ‘We will test it in different countries and with different communities,’ Persson explains.

Accelerating in the final phase

‘What positively surprised me within the Agreement is the enthusiasm of a number of companies and their constructive contributions,’ Persson concludes, ‘There are companies saying: “we want to raise the bar.” In the coming period we need to show together that this Agreement can truly make a difference for people in the supply chain. That is what it is ultimately about. Let’s seize this moment.’

Akshaya Prabakar

Sustainability Manager



TeneT may not be a solar or wind energy company, but as a European transmission system operator, it sits at the heart of the energy transition. The organisation links offshore wind farms to the mainland grid, making it closely tied to supply chains and social risks involved in the transition. For Akshaya Prabakar, Sustainability Manager at TeneT, it is clear: this is not something you do alone.

‘If we want to achieve something together, we can. Always.’

Building a foundation to join

TeneT joined the Agreement more than a year after it launched. It was a deliberate choice: ‘We were asked to participate from the start, but we weren’t ready. “We first had to develop our own human rights strategy and due diligence approach,” Akshaya says. She built the foundation step by step, and not from behind her desk: ‘In this case, the policy couldn’t be written from behind a laptop. So, I conducted fieldwork, visited various TeneT sites, and spoke with employees and vulnerable stakeholders to assess our impact.’ Once this groundwork was done, joining a multi-stakeholder initiative became

the logical next step, Akshaya explains: ‘Human rights and due diligence - you cannot solve that as a single company. Strength lies in collaboration.’

Knowledge that works immediately

‘The Agreement offers a great deal of knowledge,’ says Akshaya. ‘The webinar on state-sponsored forced labour was extremely valuable. It was a topic we knew little about. The same was true for sessions on biodiversity and circularity in the wind sector. As a transmission system operator, it is important to know what developers are working on and where we can join forces.’ she adds. The

tools are equally valuable: ‘Sustainability teams have limited resources and a great deal of work. By making templates available that you can use straight away, you immediately have a policy put together. That may sound simple, but it makes an enormous difference.’ TeneT also contributes, for example by sharing its experiences during an intervision session on Access to Remedy, with a concrete example from its own practice: a Worker Welfare Group in Singapore, in which companies operating on the same site jointly hold suppliers to account. ‘Collective leverage helps,’ according to Akshaya. ‘If you ask it alone, a supplier will say, “that’s not possible.” But if you do it together, it’s a very different story.’ ▶

From knowledge to action

At this stage, the Agreement has reached a turning point towards concrete action: ‘We started with getting to know each other and sharing knowledge. That was necessary and valuable. But now it is time for proof of concepts and pilots - actionable insights. Because the success of this Agreement is not about the amount of knowledge we have shared, but about what kind of impact we generate.’ On her agenda is developing shared, uniform processes around the EU Forced Labour Regulation, further collaboration on forced labour in Asia, and a more active role for government within the Agreement. ‘I hope the government will speak out more on what matters,’ she states, ‘What is the Netherlands’ clear plan for renewable energy?’

Copper as shared priority

In the new Fair Impact Programme Copper Peru & Chile, TenneT is working together with CNV International and other partners: ‘Copper is one of our most important raw materials for cables and transformers. It is one of our focus materials in circularity.’ The supply chain is complex and opaque and presents several challenges. For example, there is limited transparency of CO₂ emissions during extraction. Another challenge is a limited availability of secondary raw materials. ‘Where do the social and environmental risks lie,’ Akshaya says, ‘and what is our role in addressing them? As a single company, you are too far removed from that supply chain. But together, you can create transparency.’



Every step is a step forward

She is realistic about what sustainability demands, and yet optimistic about the future: ‘Making impact always takes time. I knew that when I started working on human rights at TenneT. But we cannot say, “it takes a long time, so we do nothing.” That is simply not an option.’ Akshaya has recalibrated her own definition of success: ‘Success does not mean, for instance, that paying living wages will

happen tomorrow. But if someone from procurement or projects recognises a forced labour indicator, that counts as success, because I have helped someone realise the importance of the issue. The Agreement gives us the space and the collaboration to move from knowledge to action.’ She laughs: ‘I continue to be an optimist: if we want to achieve something together, we can. Always.’

The Dutch Ministries of Foreign Affairs (MFA) and Economic Affairs and Climate Policy (MEACP) represent the Dutch government as members of the Agreement and support it both financially and substantively. The government attaches great importance to a fair, socially just and sustainable energy transition and appreciates the focus of this multi-stakeholder initiative on collaboration, knowledge sharing and joint learning, including through joint projects in the supply chain. In this way, the Agreement fosters interaction between the various parties to collectively develop solutions. The MFA actively participates in the General Assembly, the Steering Committee, various working groups, and in promoting the Agreement both at home and abroad.

Domestic activities

In 2025, the Ministry of Economic Affairs and Climate Policy (MEACP) included RBC criteria in the tenders for the offshore wind energy site Nederwiek 1A (1 GW). Due to limited market interest, the tenders for other sites were postponed. Unfortunately, there were no bids in the tender for Nederwiek 1A, meaning that no offshore wind farm sites were awarded in 2025. In the winter of 2025–2026, the MEACP drafted the documents for two tenders for the IJmuiden Ver Gamma A and B sites (2 × 1 GW). These tenders will close in December 2026, so the results are expected in early 2027.

Over the past year, significant attention has been devoted to outreach and recruitment efforts in order to expand participation in the IRBC Agreement. The MFA and MEACP have held discussions with various stakeholders in the hydrogen sector and have participated in SHIP > NL sessions. These conversations are part of an exploratory process to assess whether the hydrogen sector could join the Agreement.

In addition, the MFA has held individual meetings with companies operating in the renewable energy sector. At the same time, the MFA has been working on the implementation of several pieces of European legislation, such as the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the EU Forced Labour Regulation (FLR). Members are regularly updated on the latest legislative developments. Moreover, the Agreement continues to be highlighted during meetings and events, such as the FLR Day organised by the government. On specific topics, such as labour migration or workers' welfare, the Ministry of Social Affairs and Employment has also been involved in the discussions.

By keeping members informed about policy developments and new legislation, they are better prepared for upcoming changes and requirements.

International activities

The Dutch government continues to promote RBC beyond Dutch borders. As part of its role in reaching out to other countries, the MFA has participated in various events ►

abroad. For example, it once again took part in the OECD Forum on Responsible Mineral Supply Chains in May 2025 and held discussions with several stakeholders in the critical raw materials and renewable energy sectors. In November 2025, the MFA participated in a joint outreach event with the German Energy Sector Dialogue on worker welfare, where it also shared government perspectives and policy initiatives during a panel discussion. The Dutch Ministry of Social Affairs and Employment also joined this event. This session was part of our ongoing outreach to other governments to strengthen collaboration and knowledge exchange, and it has led to continued dialogue with the governments of Germany, Denmark and Sweden.

Moreover, the MFA has worked on improving the engagement of its embassies worldwide with the Agreement. The embassies have extensive knowledge of the local context, which is very useful when implementing collective projects or when following up on research results from specific countries. In addition, the MFA encourages and facilitates the exchange of information between the embassies and the members.

Looking back and forward

Looking back at the results of the third year, the second due diligence assessment has shown that companies in both the wind and solar energy sectors have made progress in applying the six steps of due diligence set out in the OECD Due Diligence Guidance for Responsible

Business Conduct. Companies from both sectors acknowledged that participation in the Agreement helped achieve this. The assessment also helped identify remaining gaps and define the direction for addressing these gaps in 2026.

The members are collaborating in collective actions, such as projects on artisanal mining in Peru, worker welfare, forced labour and working conditions in China, and supply chain traceability. However, company participation in collective actions has remained limited, and we are exploring ways to encourage companies to participate more actively in the coming years. The results for 2025 show that awareness of, and focus on, RBC in the renewable energy sector is growing, with more companies implementing due diligence. These developments continue to be encouraged at the European level, driven by legislation such as the Forced Labour Regulation and the Corporate Sustainability Due Diligence Directive.

Furthermore, the Dutch implementation of the Net Zero Industry Act (NZIA) is in development and requires a rapid scale-up of clean technologies in Europe. The RBC criteria within the NZIA help ensure that this transition is carried out responsibly by safeguarding human rights, environmental standards and fair practices across value chains for both solar (PV) and (offshore) wind. In order to facilitate this transition, the MCEAP decided that, for offshore wind, the draft tender documents for the Ijmuiden Ver Gamma A & B tenders would incorporate RBC criteria

based on the requirements of the NZIA. In the future, the development of both solar PV and (offshore) wind will be further stimulated through a procedure called Contracts for Difference, in line with European legislation.

It remains to be seen exactly how the RBC criteria will be incorporated into these procedures. It is already clear that the NZIA criteria are a mandatory element of the procedures and that RBC criteria will therefore play a larger role in the development of future solar PV and (offshore) wind projects. Looking ahead, European legislation will help prevent issues in the renewable energy supply chain, and the government will continue to encourage and support companies to prepare for this by actively participating in the RBC Agreement.



Kristina Ullrich

Senior Private Sector Engagement Officer

For Terre des Hommes Netherlands (TdH NL), one goal is central: to eradicate child labour. Within the IRBC Agreement for the Renewable Energy Sector, the organisation brings a perspective that may seem far removed from European energy projects but is closely connected to them. ‘We examine child labour in global supply chains,’ says Kristina Ullrich, Senior Private Sector Engagement Officer at TdH NL. ‘Many of our projects relate to minerals that are mined somewhere in the world and eventually end up in products.’

‘We want to prevent the energy transition from unintentionally increasing child labour.’

This also applies to minerals used in renewable energy, such as mica, copper, aluminium, and nickel. ‘The demand for these minerals is growing rapidly due to the energy transition,’ according to Ullrich. ‘Without attention to the risks, that demand can actually lead to an increase in child labour rather than a decrease.’

Learning from ten years of experience with mica

Mica is used in electronics, cosmetics and, according to TdH NL’s desk research, components of wind turbines and solar panels. TdH NL has worked for more than a decade to combat child labour in mica mining. ‘In India and Madagascar, many thousands of children work in mica mines,’ Ullrich explains. ‘These are often remote areas, so exact figures remain difficult to determine.’

TdH NL developed an approach that involves both companies and local communities: ‘We combine a supply chain approach with an area-based approach. So, we work with companies in the supply chain, but also with entire communities. The aim is not only for a product to become “clean” of child labour, but that children go to

school instead of working,’ Ullrich says. ‘Poverty is a major driver,’ she continues, ‘If children stop working, families need alternative income. That is why we support small loans for agricultural activities and ensure access to quality education.’

Research into risks in new minerals

The mica programme formed the basis for new research within the Agreement. In 2024, TdH NL presented desk research on child labour in critical and strategic minerals. In that research,’ Ullrich adds, ‘we looked at minerals and countries with a higher likelihood of child labour.’ Funding in 2025 enabled follow-up research on nickel mining in the Philippines and bauxite mining in India: ‘It confirmed our earlier analysis: child labour is present in the supply chain. However, in large-scale mining, children are usually not working in the mines,’ she explains, ‘but they are involved around them. For example, in transport, in canteens, or in adjacent informal mining. Also, minors are at risk of sexual exploitation around export ports. That shows how complex these supply chains are.’ ►

Knowledge fuels action

By organising knowledge sessions for Agreement participants, TdH NL aimed to raise awareness of risks in their supply chains: ‘During our presentation, we noticed that some companies were genuinely surprised - even shocked,’ Ullrich elaborates. This knowledge led to more action: ‘It is great when companies say: “let’s look together at what we can do.”’

Opportunities to develop and address

The opportunities within the Agreement arise from close collaboration with companies and sector organisations. As Ullrich puts it: ‘The Agreement provides a safe environment. Companies can explore together where risks lie and how to address them.’ This also supports the development of new and practical due diligence tools: ‘One of the questions companies struggle with is how to include the voices of the rights holders. How do you ensure that children and communities themselves are heard in that process?’ According to Ullrich, TdH NL can play an important role here.



Taking responsibility together

For the remaining duration of the Agreement, Ullrich’s ambition is quite clear: translate found knowledge into concrete action. ‘With renewable energy, we are trying to tackle climate change to give our children a future,’ Ullrich explains, ‘but at the same time we must not forget that other children elsewhere in the world are working

for that energy. We want to prevent the energy transition from unintentionally increasing child labour.’ Terre des Hommes Netherlands prioritises collaboration and actions that create a positive impact for these children. ‘No single organisation can solve this problem alone,’ Ullrich concludes, ‘We need companies, governments, and NGOs to realise real change together.’



Luuk Eeftink

CSR Manager

Sunbeam participated in the IRBC Agreement for the Renewable Energy Sector at an early stage. This was not a mere formality: ‘For us it really came from intrinsic motivation,’ says Luuk Eeftink, CSR Manager at Sunbeam. ‘Since 2020 we have been actively working on sustainability, mainly on climate and CO₂ reduction. The next step was to look at human rights and due diligence. The Agreement fitted perfectly with that.’

‘You do not have to be perfect to begin.’

Sunbeam produces mounting systems for solar panels. The company does not produce renewable energy products itself but plays an important role in the solar energy value chain. It also works with a wide range of materials, from aluminium and steel to plastics.

With around thirty employees, Sunbeam is a relatively small company. That is precisely why Eeftink sees value in collaboration through the Agreement. ‘You simply have less capacity,’ he explains. ‘Templates, policy tools, and contacts are extremely valuable. You do not have to figure everything out yourself.’

Important lessons and insights

For Eeftink personally joining the Agreement was also about learning. A due diligence training on the OECD Guidelines proved an important starting point: ‘That training was extremely useful. It gave insight into how due diligence works within a company and what the OECD Guidelines actually require.’

Another important insight was that companies do not have to be perfect before they begin. ‘Many companies think they need to have everything in order before joining. But the whole idea of due diligence is that you start, report honestly and improve step by step.’

Risks in a complex value chain

Sunbeam operates within an international value chain with most direct suppliers close. ‘We are a small company with a few loyal suppliers, mostly in Europe,’ says Eeftink. ‘Within that direct circle you can reasonably assume that regulations and standards are similar to ours.’ One of our suppliers switched to renewable energy of their own accord. Eeftink explains: ‘In that case you want to reward that by saying “this is exactly what we need right now” because it also helps us move forward.’

Further down the value chain are the EPC companies that apply Sunbeam’s systems. ‘They often work with migrant workers. Those are people we do not know or speak ►

to ourselves, but who are working with our products.’ Although Sunbeam does not directly manage those parties, the company tries to start conversations with their customers. ‘You can at least ask customers whether they are thinking about this and how they deal with working conditions. That is one way of taking responsibility.’

Materials and raw materials

At the other end of the value chain are the raw materials used to manufacture the products: plastic, aluminium and above all steel. For plastics, Sunbeam almost entirely uses recycled material. Aluminium largely comes from suppliers with high recycling rates. Steel, however, remains a challenge. ‘Steel is the largest part of our materials,’ says Eeftink. ‘And that immediately puts you in international value chains. You may work with a European producer, but the iron ore could literally come from anywhere in the world.’ This is where collective action through the Agreement becomes important. ‘As a small buyer you only purchase a fraction of total production. That means your leverage is limited. But if companies move forward together, you can eventually exert influence.’

Learning and improving together

Sunbeam is currently also active in the Steering Committee of the Agreement. Eeftink sees this as an opportunity to gain experience about collaboration within the Agreement. ‘It helps to understand what lies behind the Agreement and how we as a company can contribute to it.’

In the coming years he sees opportunities in new collective projects. ‘The most important thing is that

collective initiatives emerge for companies to join. They do not all have to be completed within the current duration of the Agreement, but they do need to start.’ As the Agreement enters its fourth year, Eeftink sees this as the logical next step. ‘The willingness to collaborate is there,’ he says. ‘Now it is time to translate that into concrete action.’ That collaboration is the biggest strength of the Agreement: ‘As a company on your own you can change very little. That is exactly why this Agreement exists.’



‘Complex does not mean impossible’

As Policy Advisor International Affairs at FNV, Vivian Vaessen has worked within IRBC Agreements for years to improve working conditions. Within the IRBC Agreement for the Renewable Energy Sector, she connects sectors including energy companies, construction, metal, offshore and international supply chains. ‘As a spider in the web,’ she says, ‘I help coordinate with colleagues from different sectors and internationally. That way, we ensure the right expertise is at the table.’

New energy transition projects such as solar parks and offshore wind are emerging quickly, requiring large numbers of workers. ‘These are often migrant and posted workers,’ she explains, ‘Sometimes you are dealing with as many as nine layers of subcontracting, which complicates determining who is responsible for what.’

Gaining insight into what would otherwise remain invisible

Within the Worker Welfare Project of the Agreement, tools have been developed to better map labour risks. During a stakeholder engagement session in Brussels, FNV advocated a kind of site ID card, allowing companies to see where workers have been employed and under what conditions. ‘In Belgium they have ConstruBadge, which helps combat identity fraud, social dumping and illegal employment. It strengthens workers’ positions and simplifies administration for companies,’ says Vaessen. A balance between transparency and privacy is essential: ‘But it becomes problematic when people have disappeared from a construction site after two weeks, and it is unknown where they worked or what they are entitled to.’



Vivian Vaessen

Policy Advisor International Affairs

From risk analysis to impact

Worker welfare goes beyond registration. ‘Sustained attention to occupational health and safety is a priority,’ Vaessen adds, ‘and trade union freedom, the right to collective bargaining and a living wage are fundamental.’ Child and forced labour still occur in certain mining supply chains. ‘Those are mega risks,’ according to Vaessen.

The Brussels session showed that companies are looking for both exchange and clarity. ‘It’s complicated, especially when risks sit six steps further down the supply chain,’ Vaessen explains, ‘but complex does not mean impossible.’ FNV’s contacts are essential in this regard: ‘You can talk ►

about workers, but you can also talk with them,' Vaessen emphasises, 'That is the strength of the trade union movement.'

Vaessen likes to focus on where influence is possible: 'Leverage can be extremely limited. Then you have to be honest about what one can achieve.' Within the Agreement, she sees opportunities to develop targeted collective actions with companies to make a difference together: 'If the largest players all say "this is our standard", you can develop a shared standard and enforce it. We need to explore how we can reach sector wide agreements and look for where we can genuinely achieve improvements.'

Building trust

FNV's role in the Steering Committee is critical but also constructive and focused on building trust between the parties. 'As a trade union, you are by nature not side by side with employers, but often opposite them,' says Vaessen, 'but within this Agreement we are truly working together. We give trust, but we also look at things critically. The proof of the pudding is in the eating.' Cooperation is always the starting point. Vaessen sees that exchange between the parties has grown and that they are finding each other more easily: 'The threshold for approaching a trade union or NGO has become lower. Building trust takes time,' she says. 'It does not happen automatically. You have to get to know each other.'



Willingness to improve

The energy transition is by definition international, as many companies operate across borders and raw materials come from the same regions. Vaessen underlines the importance of European cooperation: 'Each of us is simply too small on our own.' FNV works with international partners to connect policymakers, companies and workers. The Agreement provides a valuable instrument to make commitments concrete and to advance human rights due diligence. 'We may not have the same legislation

everywhere, but we do have the instrument to make agreements together and give them practical shape.'

With two years remaining, Vaessen sees room to deepen cooperation further: 'We need to create more impact. That also takes time, but we are all facing in the same direction.' She remains cautiously optimistic: 'It is not perfect. But I see such a willingness to learn, improve and take steps in this sector. And that makes all the difference.'

Colophon

This third progress report of the International RBC Agreement for the Renewable Energy Sector (REA) covers the period May 2025 to April 2026. This annual report was published in July 2026.

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